

Responsible Banking Ordinance

Bi-Annual Community Reinvestment Report for 2023

May 19th, 2023



Submitted by:
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May 19th, 2023

City of San Diego
1200 Third Avenue, Suite 200
San Diego, CA 92101

To Whom It May Concern:

On the following pages, you will find Bank of America's bi-annual submission of data related to the City of San Diego's Responsible Banking Ordinance Community Reinvestment Plan.

Please reach out if you have any questions.

Sincerely,



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Bank of America 2023 Community Reinvestment Plan for the City of San Diego

Bank of America does not create Community Investment plans. Generally, our clients rely on the federal CRA rating of Satisfactory and above as criteria for deciding in which institutions to invest.

Bank of America Corporation including its enterprise subsidiaries is committed to creating opportunities in the communities it serves by meeting customers' credit needs, including those of Low- and Moderate-Income ("LMI") individuals and neighborhoods. Bank of America has a clear purpose to make financial lives better for our clients and the communities we serve and is committed to helping consumers achieve their financial goals.

Through our community-centered approach, we work to meet our clients' and neighbors' needs by connecting them to tailored products and services, jobs, and capital to help increase financial resilience and our local communities thrive.

During the previous review period (2012-2016), the OCC rated the bank Outstanding, the highest rating issued by the OCC.

The bank is currently awaiting OCC results for 2017 – 2020.

Community Reinvestment Act Rating:

Overall CRA Rating: Outstanding

California CRA Rating: Outstanding

On the following pages, you will find the CRA Evaluation for Bank of America issued by the Office of the Comptroller of the Currency (OCC). Starting on page 190, you will find details regarding our California state ratings report.



PUBLIC DISCLOSURE

January 8, 2018
Revised Page 220 on September 3, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank of America, N.A
Charter Number 13044

100 North Tryon Street
Charlotte, North Carolina 28255

Office of the Comptroller of the Currency

Large Bank Supervision
Constitution Center
400 7th Street SW
Washington, District of Columbia 20219

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

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Overall CRA Rating

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

The following table indicates the performance level of Bank of America, N.A. with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- Excellent Lending Test performance in a majority of the rating areas, particularly in the most populous rating areas such as the New York Multistate Metropolitan Statistical Area (MSA), Washington DC Multistate MSA, and the states of California, Florida, and Texas. In general, the bank demonstrated good lending activity, good geographic distribution, good borrower income distribution, and an excellent level of CD lending;
- Excellent level of Community Development investments that are highly responsive to community credit needs. Bank of America demonstrated excellent Investment Test performance in a substantial majority of its rating areas; and
- Good Service Test performance. The bank’s service delivery systems are accessible to low- and moderate-income individuals and geographies in a significant majority of the bank’s rating areas, when also considering alternative delivery systems.

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 characteristics, 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) provided the bank has adequately addressed the community development needs of its 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: 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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate 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 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.

Tables of Performance Data Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. CD loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (h) - 6 and - 7 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/assessment area. The table separately presents investments made during a prior evaluation period that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank’s financial reporting system.
- A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank’s assessment area. See Interagency Q&As __.12 (h) -6 and - 7 for guidance on when a bank may receive positive CRA consideration for such investments.
- Table C. Branch and ATM Distribution Level by Geography Income Level** – Shows the percentage distribution of census tracts, population, branches, ATMs, and branches opened and closed in low-, moderate-, middle-, and upper-income geographies.
- Table D. Lending Inside and Outside of the Assessment Area** – Shows the distribution of mortgage, small business and small farm, and consumer lending inside the assessment areas compared to the lending outside the assessment areas.

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Description of Institution

Bank of America, N.A. (BANA or “bank”) is an interstate national bank headquartered in Charlotte, North Carolina. BANA is a wholly owned subsidiary of Bank of America Corporation (BAC), an international banking and financial services company with over 208,000 full-time employees. BAC stock (NYSE: BAC) is listed on the New York Stock Exchange. BAC operates in all 50 states, the District of Columbia, U.S. Virgin Islands, Puerto Rico, and in more than 35 countries. As of December 31, 2016, BAC reported \$2.2 trillion in assets. Based on total assets, BAC is the nation’s second largest banking company behind New York-based JPMorgan Chase & Co., which reported \$2.6 trillion in total assets. Bank of America, N.A. reported \$1.7 trillion in total assets, \$1.5 trillion in liabilities, and \$163.5 billion in equity capital. The bank’s assets increased approximately 15 percent during the evaluation period. The bank has \$1.3 trillion in deposits in domestic offices and \$801.8 billion in total loans and leases in domestic offices (\$890.2 billion in total loans and leases worldwide). The bank’s Net Tier 1 Capital totals \$149.8 billion, a 25 percent increase from \$120 billion reported at the beginning of the evaluation period. BANA’s Tier 1 Risk-Based Capital represents 12.7 percent of Risk Weighted Assets while its Tier 1 Leverage Capital equals 9.3 percent of average assets.

Through its banking subsidiary BANA, the company provides a broad range of financial services to its customers through the following four main core business segments: Consumer Banking, Global Wealth and Investment Management (GWIM), Global Banking, and Global Markets. The bank’s strategic focus is to help make financial lives better through a strategy of responsible growth. Responsible growth includes a focus on environmental, social, and governance leadership. The bank serves three groups of customers – people, companies, and institutional investors – through its eight lines of business. This business model simplifies the bank’s operations and reduces its risk profile. Every week, the bank interacts with customers more than 130 million times. BANA provides banking products and services to more than 46 million consumers and small businesses through its retail network that covers a geographic area encompassing 80 percent of the U.S. population. The bank operates a retail network of 4,600 financial centers (branches) in 33 states, 15,900 Automated Teller Machines (ATMs), and online and mobile banking platforms with approximately 34 million online banking accounts and 22 million mobile banking users. BAC’s Global Banking and Global Markets segments serve large corporations, governments, institutions, and individuals around the world. Global Banking works with virtually every company in the S&P 500. The Global Markets business serves many of the world’s largest institutional investors who manage savings and investments through pension and retirement funds. The GWIM segment provides comprehensive wealth management to affluent and high net worth clients and maintains a portfolio of approximately \$2.5 trillion in customer assets.

The bank’s primary loan products are commercial and home mortgage loans. Consumer credit lending includes a variety of residential mortgage and home equity products, credit cards, automobile loans, and other closed-end loans for personal, household, or family purposes. Commercial lending includes agricultural loans, real estate and construction loans, multifamily housing loans, and loans to purchase equipment or for short-term working capital needs. As of December 31, 2016, the distribution of the bank’s \$801.8 billion domestic loan portfolio by principal balances outstanding is as follows: residential mortgage loans (\$241 billion or 30 percent), commercial loans including non-farm non-residential real estate (\$256.8 billion or 32 percent), construction and land development (\$9.1 billion or 1 percent), multifamily real estate

(\$6 billion or 1 percent), consumer loans comprising primarily credit cards, automobile loans, and other closed-end loans for personal, household, or family purposes (\$170.9 billion or 21 percent), agricultural loans (\$670 million or less than 1 percent), loans to depository institutions (\$1.1 billion or less than 1 percent), obligations of states and local governments (\$19.3 billion or 2 percent), loans to nonbank financial institutions (\$73.1 billion or 9 percent), and leases (\$21 billion or 3 percent).

BANA offers a wide range of deposit products and services for consumers and businesses, as well as wealth management and investment services. Deposit products and services include a variety of consumer and commercial checking and savings accounts, wire transfer and cash management services, and various methods to access accounts through online banking, mobile banking, and phone banking.

BANA has no known legal or financial impediments that would have hindered its ability to meet the credit and community development needs of its assessment areas during this evaluation period.

The bank received an overall "Satisfactory" rating in its most recent PE, ending December 31, 2011.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation covers the bank's CRA-related activities from January 1, 2012, through December 31, 2016. The OCC considered the bank's home mortgage lending, small business lending (including business credit cards), small farm lending, CD lending, grants, donations, and other investments for CRA purposes. Examiners also considered any other loan data such as Letters of Credit used to support community development activities. Management did not request consideration for its consumer lending, which would include automobile loans and consumer credit cards.

BANA acquired FIA Card Services, N.A. (FIA) on October 1, 2014. FIA was a bank affiliate of BANA and a bank subsidiary of NB Holdings Corporation (NBH), a wholly owned subsidiary of BAC. FIA was subject to CRA and received a "Satisfactory" rating during its last performance evaluation (charter #22381), dated December 31, 2011. FIA was one of the largest issuers of consumer and small business credit cards in the U.S. At the time of the merger, FIA had \$127 billion in total assets, \$85 billion in total deposits, and \$19 billion in Tier 1 Capital. All of FIA's assets, deposits, and capital were absorbed into BANA. The two financial institutions had New Castle County, Delaware as the one overlapping assessment area. The merger did not add any new assessment areas for BANA. The current evaluation includes FIA's small loans to businesses, small loans to farms, and community development services for the years 2012 through 2014.

Selection of Areas for Full-Scope Review

Bank management has defined 248 assessment areas comprising primarily MSAs within 33 states and 14 multistate MSAs. The states and multistate MSAs comprise the 47 rating areas that examiners assigned ratings. For analysis purposes, the examiners combined any non-MSA assessment areas within each state. From each rating area, the examiners selected one or more assessment areas for full-scope reviews. In states with multiple large metropolitan areas such as California, Florida, and Texas, examiners selected more than one assessment area for a full-scope review. Across all rating areas, the examiners selected 73 full-scope assessment areas. Examiners based these selections on several criteria, including the bank's deposits and loans and the assessment area's geographic size and population relative to the rating area. Examiners also selected smaller assessment areas that examiners had not previously reviewed as full-scope assessment areas during prior evaluations.

Refer to the "Scope" section under each state and multistate MSA rating section for details regarding how examiners selected the areas.

Inside/Outside Ratio

Examiners performed an analysis of the bank's lending volumes inside and outside its assessment areas at the institution level. The bank originated or purchased a substantial majority of its home mortgage loans, small loans to businesses, and small loans to farms to borrowers within its assessment areas. During the evaluation period, the bank originated or

purchased more than 88 percent of its loans by number and nearly 92 percent by dollar volume to borrowers inside its assessment areas. See Table D for details of the bank's lending inside and outside of its assessment areas.

Table D - Lending Inside and Outside of the Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)	
	Inside		Outside			Inside		Outside			
	#	%	#	%		\$	%	\$	%		
Home Mortgage											
2012	320,138	87.3	46,432	12.7	366,570	78,190,623	90.9	7,870,328	9.1	86,060,951	
2013	409,771	86.1	66,403	13.9	476,174	96,717,175	89.8	10,933,538	10.2	107,650,713	
2014	165,612	84.4	30,540	15.6	196,152	42,734,592	90.1	4,685,282	9.9	47,419,874	
2015	157,137	88.0	21,458	12.0	178,595	52,395,769	92.8	4,086,715	7.2	56,482,484	
2016	160,118	90.0	17,720	10.0	177,838	59,554,402	94.3	3,610,247	5.7	63,164,649	
Subtotal	1,212,776	86.92	182,553	13.1	1,395,329	329,592,561	91.36	31,186,110	8.6	360,778,671	
Small Business											
2012	278,760	87.4	40,118	12.6	318,878	10,537,374	92.0	910,232	8.0	11,447,606	
2013	372,407	88.8	47,134	11.2	419,541	11,517,067	92.6	918,568	7.4	12,435,635	
2014	386,345	88.4	50,686	11.6	437,031	11,172,606	92.2	939,778	7.8	12,112,384	
2015	384,495	90.2	41,959	9.8	426,454	10,977,540	93.2	798,008	6.8	11,775,548	
2016	445,883	90.9	44,504	9.1	490,387	11,869,096	93.4	841,983	6.6	12,711,079	
Subtotal	1,867,890	89.3	224,401	10.7	2,092,291	56,073,683	92.7	4,408,569	7.3	60,482,252	
Small Farm											
2012	2,495	53.4	2,180	46.6	4,675	54,768	61.2	34,706	38.8	89,474	
2013	3,199	53.9	2,734	46.1	5,933	62,191	65.9	32,154	34.1	94,345	
2014	3,053	50.9	2,949	49.1	6,002	65,579	65.2	35,036	34.8	100,615	
2015	2,877	54.7	2,386	45.3	5,263	66,495	67.7	31,698	32.3	98,193	
2016	3,061	54.3	2,572	45.7	5,633	66,618	67.4	32,276	32.6	98,894	
Subtotal	14,685	53.4	12,821	46.6	27,506	315,651	65.6	165,870	34.4	481,521	
Total	3,095,351	88.1	419,775	11.9	3,515,126	385,981,895	91.5	35,760,549	8.5	421,742,444	

Source: Evaluation Period: 1/1/2012 - 12/31/2016 Bank Data

Due to rounding, totals may not equal 100.0

Flexible Lending Programs and Other Lending Information

The bank's use of flexible lending programs positively enhances the bank's lending performance. Since January 1, 2012, the bank provided 190,135 flexible mortgage and small loans to businesses totaling \$27.8 billion to low- and moderate-income borrowers, small businesses, or in low- and moderate-income geographies. The bank's flexible lending programs include government insured Federal Housing Administration (FHA), Veterans Administration (VA), and Making Homes Affordable (MHA) Home Affordable Refinance Program (HARP) loans. The bank also offers flexible lending programs through its participation with multiple third-party partners in providing 2,836 loans totaling \$398 million. These partnerships include Neighborhood Assistance Corporation of America (NACA) and Massachusetts Housing Partnership (MHP). During the evaluation period, the bank launched two new flexible lending programs including the Affordable Loan Solutions (ALS) and Business Advantage Credit Line. Loans originated or purchased under government insured or sponsored programs represent more than 97 percent of the total flexible lending volume.

In addition, Bank of America issued 160 Letters of Credit totaling nearly \$1.6 billion. These Letters of Credit helped many financing deals to come to fruition to create nearly 11,000 units of affordable housing.

Ratings

The bank's overall rating is a blend of the multistate MSA ratings and state ratings.

Under the Lending Test, the weighting of the loan products varied according to the proportion of lending by loan products within each rating area during the evaluation period. Examiners calculated the loan product weighting for each rating area and applied those weights to each assessment area within the rating area. Generally, examiners assigned the most weight to home mortgage loans and small loans to businesses.

In a substantial majority of rating areas, small loans to farms represented less than 1 percent of the loan volume within those rating areas and therefore carried the least amount of weight when determining the rating. In many assessment areas, the bank originated very few, if any, small loans to farms. In assessment areas with a minimum of 25 small loans to farms originated or purchased, examiners provided conclusions in the narrative for the applicable rating area. Otherwise, examiners did not analyze the small loans to farms nor provide conclusions.

Examiners compared the bank's lending performance against available demographic data and aggregate lender performance. Examiners also considered any relevant performance context information available. Expectations for lending in low-income geographies were the same for lending in moderate-income geographies. However, examiners weighted performance in moderate-income geographies more heavily if there were a limited number of owner-occupied housing units, businesses, or farms in low-income geographies. Examiners also lowered expectations for lending to low-income borrowers due to the increased difficulty lower-income individuals face in qualifying for affordable mortgages in many markets, particularly in high-cost markets. In general, examiners gave more weight to the bank's lending performance relative to demographics and less weight to performance relative to aggregate lenders. However, in some

cases, it was more appropriate for examiners to place more weight on performance relative to aggregate lenders such as when bank performance exceeded aggregate, but bank performance and aggregate are less than demographic. In those cases, performance relative to aggregate lenders can be more reflective of market conditions such as loan demand and opportunities for lending. To assess the bank's lending activity in each assessment area, examiners compared the bank's market share and rank of loans using peer loan data to its market share and rank in deposits using Federal Deposit Insurance Corporation (FDIC) deposit market share data as of June 30, 2016. Deposit market share data includes deposit data for FDIC-insured institutions such as banks and savings and loan associations (depository financial institutions). FDIC deposit market share data does not include credit unions.

Examiners determined the multistate MSA ratings and state ratings primarily from those areas that received full-scope reviews. Examiners considered performance in limited-scope assessment areas to determine if performance has a positive, negative, or neutral effect on the state rating. Refer to the "Scope" section under each state and multistate MSA rating section for details regarding how examiners weighted the areas in arriving at the respective ratings.

CD lending based on volume, complexity, and responsiveness provided a significantly positive, positive, neutral, or negative effect to the rating area's Lending Test rating, as applicable.

For Investment Test conclusions, examiners considered qualified investment, grant, and contribution activity in each assessment area and the responsiveness of those activities to the credit and community development needs identified in the community. Examiners also considered qualitative factors such as complexity and innovation, when present.

To put CD lending or investment activity in perspective, examiners compared the CD lending or investment volume in each assessment area to the Tier 1 Capital allocated to each assessment area according to the assessment area's proportion of the bank's total deposits.

For Service Test conclusions, examiners placed primary consideration on the distribution of the bank's financial centers and their accessibility to low- and moderate-income individuals and geographies.

Examiners considered the effect to the community from the opening and closing of financial centers. During the evaluation period, senior management continued to implement the bank's "Project New BAC" initiative to streamline the company's operations and reduce annual operating costs. The cost cutting efforts resulted in the sale of 356 financial centers and the closure of 903, many of which were performing poorly financially due to the steep declines in customer traffic as banking habits changed with improvements in technology. In a majority of the closures, accountholders continued to receive banking services at existing nearby financial centers. However, because of this business strategy, the bank exited 31 assessment areas during the evaluation period.

Examiners also considered alternative delivery systems to the extent they helped improve access to retail banking services where financial centers may be limited. The alternative delivery systems include the following six delivery channels: mobile banking, telephone banking, text banking, online banking, cash dispensing ATMs, and full-service ATMs. To

determine the effect alternative delivery systems had on the bank's service delivery systems, examiners compared the usage by customers residing in low- and moderate-income geographies for mobile banking, telephone banking, text banking, and online banking against the percentages of the population residing in low- and moderate-income geographies. For cash dispensing and full-service ATMs, examiners compared the geographic distribution of the ATMs against the percentages of the population in low- and moderate-income geographies.

In full-scope assessment areas, examiners considered the accessibility adjacent or nearby financial centers (in middle- and upper-income geographies) provide to low- and moderate-income geographies. Examiners used various census tract reports, financial center geocoding reports, and maps to identify adjacent financial centers that are located within ½-mile of a low- or moderate-income census tract that does not already have a financial center presence. Examiners excluded any adjacent financial centers that have geographic barriers such as a river, mountain, or major highway to prevent access to the low- or moderate-income geographies. In addition, if more than one financial center is adjacent to the same low- or moderate-income tract, examiners only considered the nearest adjacent financial center.

Examiners considered banking hours, products and services, and the level of community development services.

The U.S. Census Bureau (Census Bureau) collects and publishes population and demographic data that examiners use to help analyze lending performance. With the 2010 Census, the Census Bureau revised its approach to collecting most of the population and demographic data used in evaluations. The banking agencies now update decennial Census data every five years, beginning with the Census Bureau's 2015 American Community Survey (ACS), to provide more current and accurate demographic data. Census tract income level designations that became effective in 2012 were subject to revision, based on the ACS data.

The Office of Management and Budget (OMB) delineates metropolitan and micropolitan statistical areas based on Census Bureau data. During the evaluation period, OMB revised the geographic boundaries of several metropolitan areas, which became effective January 1, 2014. Because the boundaries of many assessment areas changed in 2014, examiners analyzed CRA activity that occurred during 2012-2013 separately from CRA activities that occurred during 2014-2016.

While the ratings, conclusions, and analyses are based on the bank's activities over a five-year evaluation period, the PE only includes narratives and supporting tables for the years 2014, 2015, and 2016, which is the period of activity of greatest significance to overall conclusions. Additional discussion is included in the narrative when OMB boundary changes significantly affected the bank's performance context or where performance in the 2012-2013 period differs significantly from performance in 2014-2016.

Discriminatory or Other Illegal Credit Practices Review

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

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

The OCC will consider any information that BANA engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank'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 Area Ratings

Allentown-Bethlehem-Easton, PA-NJ Multistate MSA

CRA rating for the Allentown-Bethlehem-Easton, PA-NJ Multistate MSA¹: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Good distribution of loans by geography and good distribution by borrower income or business revenue size;
- Low level of CD lending;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and low- and moderate-income individuals.

Description of Institution's Operations in Allentown-Bethlehem-Easton, PA-NJ MSA

The Allentown-Bethlehem-Easton, PA-NJ Multistate MSA is Bank of America's 36th largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$1.5 billion or 0.1 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 31 depository financial institutions operating in the Allentown-Bethlehem-Easton, PA-NJ Multistate MSA, Bank of America, with a deposit market share of 9.2 percent, is the fourth largest. Competitors with deposit market shares greater than 5 percent include Wells Fargo Bank (20.2 percent), Branch Banking and Trust Company (12.4 percent), PNC Bank (11.3 percent), and Lafayette Ambassador Bank (7.4 percent). As of December 31, 2016, the bank operated 14 full-service financial centers and 24 deposit-taking ATMs in the multistate MSA.

Refer to the community profile for the Allentown-Bethlehem-Easton, PA-NJ Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

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

Scope of Evaluation in Allentown-Bethlehem-Easton, PA-NJ Multistate MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners discussed area community development needs with one local nonprofit organization. The organization's primary mission is to serve homeless families through advocacy, case management, homelessness prevention services to keep families in their homes, and services to assist homeless families in obtaining emergency housing. According to the contact, the community needs additional monetary contributions to provide housing and other services for the homeless.

During the evaluation period, Bank of America originated or purchased 3,727 home mortgage loans totaling \$628.9 million, 3,731 small loans to businesses totaling \$81.8 million, 27 small loans to farms totaling \$176,000, and 2 CD loans totaling \$286,000. Based on loan volume by the number of loans originated and purchased, examiners weighted home mortgage lending and small business lending equally, each which carried more weight than small loans to farms in determining the Lending Test rating for the Allentown-Bethlehem-Easton, PA-NJ Multistate MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALLENTOWN-BETHLEHEM-EASTON PA-NJ MULTISTATE MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the Allentown-Bethlehem-Easton, PA-NJ Multistate MSA is rated High Satisfactory, based on excellent lending activity, good geographic distribution, and good borrower income distribution.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Allentown-Bethlehem-Easton, PA-NJ Multistate MSA is excellent.

Lending activity in the Allentown-Bethlehem-Easton, PA-NJ Multistate MSA is excellent. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 9.2 percent. The bank ranks fourth among 31 depository financial institutions in the multistate MSA, which places it in the top 13 percent of depository financial institutions. According to peer mortgage data for 2016, the bank has a market share of 1.5 percent based on the number of home mortgage loans originated or purchased. The bank ranks 17th among 502 home mortgage lenders in the multistate MSA, which places it in the top 4 percent of lenders. According to peer small business data for 2016, the bank has a market share of 5 percent based on the number of small loans to businesses originated or purchased. The bank ranks eighth among 120 small business lenders, which places it in the top 7 percent of lenders. According to peer farm data for 2016, the bank has a market share of 3.3 percent based on the number of small loans to farms originated or purchased. The bank ranks 10th among 15 farm lenders, which places it in

the bottom 33 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: MULTISTATE MSAs						Evaluation Period: January 1, 2012 to December 31, 2016				
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Allentown, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	286	7,487	711,211	100.00	
Augusta, GA/SC	100.00	2,346	313,412	2,678	75,905	52	411	0	5,076	389,728	100.00	
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	11,721,727	100.00	
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	5,683,004	100.00	
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	2,131,230	100.00	
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	656	50,566	100.00	
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	650,789	100.00	
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	30,791,895	100.00	
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	7,542,073	100.00	
Portland, OR/WA	100.00	14,488	3,520,012	27,928	689,599	317	4,134	43	93,133	4,306,878	100.00	
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	2,660,607	100.00	
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	305,490	100.00	
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	3,202,727	100.00	
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	15,536,634	100.00	
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	1,000,492	100.00	

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
(****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is excellent. The bank's home mortgage lending is excellent in low-income census tracts and excellent in moderate-income census tracts.

The distribution of the bank's home mortgage loans in low-income geographies at 5.7 percent is greater than the 3.5 percent of owner-occupied housing units in low-income geographies and it is higher than the 2.9 percent aggregate distribution.

The distribution of home mortgage loans in moderate-income geographies at 18.3 percent is higher than the 16.1 percentage of owner-occupied housing units in moderate-income geographies and aggregate performance of 14.5 percent.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Allentown-Bethlehem-Easton PA-NJ MSA	1,363	227,955	100.0	23,706	3.5	5.7	2.9	16.1	18.3	14.5	45.1	39.7	43.0	35.3	36.2	39.6	0.0	0.0	0.0
Total	1,363	227,955	100.0	23,706	3.5	5.7	2.9	16.1	18.3	14.5	45.1	39.7	43.0	35.3	36.2	39.6	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good overall. The distribution is good in low-income geographies and good in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 4.9 percent is lower than the 6.2 percent of businesses operating in low-income geographies, but higher than the 4.7 percent aggregate performance. The proportion of the bank’s small loans to businesses in moderate-income geographies at 15.7 percent is lower than the 18.6 percent of businesses operating in moderate-income geographies and lower than the 16.6 percent aggregate performance.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Allentown-Bethlehem-Easton PA-NJ MSA	2,255	45,258	100.0	15,590	6.2	4.9	4.7	18.6	15.7	16.6	40.2	37.9	39.3	35.0	41.5	39.4	0.0	0.0	0.0
Total	2,255	45,258	100.0	15,590	6.2	4.9	4.7	18.6	15.7	16.6	40.2	37.9	39.3	35.0	41.5	39.4	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is good. The distribution is poor in low-income geographies and excellent in moderate-income geographies. The bank did not originate or purchase any small loans to farms in low-income geographies. Approximately 1 percent of the farms are located in low-income tracts. Bank performance in low-income geographies is consistent with aggregate lenders. The geographic distribution in moderate-

income geographies at 33.3 percent is higher than the 7.6 percent of farms in moderate-income geographies and it is higher than the 3.3 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Allentown-Bethlehem-Easton PA-NJ MSA	12	79	100.0	90	1.0	0.0	0.0	7.6	33.3	3.3	46.1	58.3	54.4	45.3	33.3	42.2	0.0	0.0	0.0
Total	12	79	100.0	90	1.0	0.0	0.0	7.6	33.3	3.3	46.1	58.3	54.4	45.3	33.3	42.2	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The bank’s distribution of home mortgage loans by borrower income is excellent overall. The distribution is excellent to low- and moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income families at 13.1 percent is lower than the 19.8 percent of low-income families and significantly higher than the 6.4 percent aggregate distribution. The proportion of home mortgage loans to moderate-income families at 23 percent is higher than the proportion of moderate-income families at 18.2 percent and aggregate performance at 17 percent.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Allentown n-Bethlehem-Easton PA-NJ MSA	1,363	227,955	100.0	23,706	19.8	13.1	6.4	18.2	23.0	17.0	21.9	19.8	21.3	40.1	34.8	36.9	0.0	9.4	18.4
Total	1,363	227,955	100.0	23,706	19.8	13.1	6.4	18.2	23.0	17.0	21.9	19.8	21.3	40.1	34.8	36.9	0.0	9.4	18.4

*Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 35.4 percent of its small loans to businesses. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 53.4 percent is lower than the 77.9 percent of businesses with gross annual revenues of \$1 million or less. However, considering the bank’s distribution is higher than the 49.6 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Allentown n-Bethlehem-Easton PA-NJ MSA	2,255	45,258	100.0	15,590	77.9	53.4	49.6	5.0	11.2	17.1	35.4
Total	2,255	45,258	100.0	15,590	77.9	53.4	49.6	5.0	11.2	17.1	35.4

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The bank’s distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 58 percent of its small loans to farms. Based on farms with known revenues, the proportion of the bank’s small loans to businesses at 55.6 percent is lower than the 97.1 percent of farms with gross annual revenues of \$1 million or less. However, considering the bank’s distribution is higher than the 46.7 percent for aggregate lenders, overall performance is adequate.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Allentown n-Bethlehem-Easton PA-NJ MSA	12	79	100.0	90	97.1	55.6	46.7	1.6	0.0	1.3	58.3
Total	12	79	100.0	90	97.1	55.6	46.7	1.6	0.0	1.3	58.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect on the bank’s Lending Test performance in the Allentown-Bethlehem-Easton, PA-NJ Multistate MSA. The bank met the community’s credit needs primarily through retail lending. During the evaluation period, the bank originated two CD loans totaling \$286,000 that helped promote economic development within the assessment area.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 84 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank’s level of qualified investments.

Bank of America’s performance under the Investment Test in the Allentown-Bethlehem-Easton, PA-NJ Multistate MSA is rated Outstanding.

The bank made 62 community development investments during the evaluation period totaling \$21.6 million. Approximately \$21.2 million or 98 percent of the current period investment dollars support more than 260 units of affordable housing. In addition, the bank has 29 community development investments totaling \$2.2 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$23.8 million or 12.5 percent of the bank’s Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$15.1 million or 70 percent of the investment dollars.

Examples of significant community development investments the bank provided include:

- The bank invested \$6.1 million in two Low Income Housing Tax Credits (LIHTCs) that support affordable housing projects creating 150 housing units in the assessment area.
- The bank invested \$250,000 in the Community First Fund (CFF), a certified CDFI dedicated to creating sustainable prosperity for low wealth communities and individuals. CFF used the investment for its general loan pool for making Small Business Administration (SBA) 7(a) loans to persons interested in starting or expanding a small business.

QUALIFIED INVESTMENTS	Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Bank of America's performance under the Service Test in the Allentown-Bethlehem-Eason, PA-NJ Multistate MSA is rated Outstanding.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

BANA's service delivery systems in the Allentown-Bethlehem-Eason, PA-NJ Multistate MSA are readily accessible to geographies and individuals of different income levels, based on a comparison of the bank's 14 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has one financial center in a low-income geography representing 7.1 percent of its financial centers and two financial

centers in moderate-income geographies representing 14.3 percent of its financial centers. According to the 2010 U.S. Census data, 7.8 percent of the population lives in low-income geographies and 20.1 percent lives in moderate-income geographies.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a positive effect on the retail banking services conclusion.

The bank has three financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to moderate-income geographies. These adjacent financial centers further improve access of service delivery systems to low- and moderate-income geographies and individuals.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened no financial centers and closed five. Two of the closures were in moderate-income geographies and the remaining three closures were in upper-income geographies. Despite the closures in moderate-income geographies, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are consistent throughout the assessment area. Financial center lobby hours are primarily 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 5:00 pm on Friday, and 9:00 am to 12:00 pm on Saturday. One financial center in an upper-income geography is open until 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Allentown-Bethlehem-Easton PA-NJ MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	16	8.9	63,877	7.8	1	7.1	2	8.3	0	0.0	0	0.0
Moderate	38	21.2	165,396	20.1	2	14.3	2	8.3	0	0.0	2	40.0
Middle	76	42.5	332,055	40.4	7	50.0	12	50.0	0	0.0	0	0.0
Upper	49	27.4	259,845	31.6	4	28.6	8	33.3	0	0.0	3	60.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	179	100.0	821,173	100.0	14	100.0	24	100.0	0	100.0	5	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

The bank provides a relatively high level of community development services within the assessment area. During the evaluation period, the bank participated with community development organizations to provide 73 community development services targeted to low- and moderate-income individuals. Employees provided 34 financial education seminars to 785 students primarily from low- and moderate-income families. Employees participated in 21 webinars and workshops with non-profit organizations to help the organizations with capacity

building. In addition, 18 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Augusta-Richmond County, GA-SC Multistate MSA

CRA rating for the Augusta-Richmond County, GA-SC Multistate MSA²: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Needs to Improve

The major factors that support this rating:

- Excellent volume of loans originated /purchased within the assessment area;
- Good distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- No origination of CD loans that negatively affect the Lending Test rating;
- Excellent level and responsiveness of qualified investments; and
- Unreasonably inaccessible service delivery systems, particularly to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Augusta-Richmond County, GA-SC Multistate MSA

The Augusta-Richmond County, GA-SC Multistate MSA is Bank of America's 39th largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$860 million or 0.1 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 20 depository financial institutions operating in the Augusta-Richmond County, GA-SC Multistate MSA, Bank of America, with a deposit market share of 10.8 percent, is the third largest. Competitors with deposit market shares greater than 5 percent include Wells Fargo Bank (21.2 percent), Georgia Bank & Trust Company (19.9 percent), Security Federal Bank (7.5 percent), SunTrust Bank (7.5 percent), Regions Bank (6.8 percent), First Citizens Bank & Trust Company (6.3 percent), and State Bank and Trust Company (5.3 percent). As of December 31, 2016, the bank operated 8 financial centers and 25 ATMs in the multistate MSA.

Refer to the community profile for the Augusta-Richmond County, GA-SC Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

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

Scope of Evaluation in Augusta-Richmond County, GA-SC MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners contacted a local nonprofit organization dedicated to improving the economy and quality of life in rural America. The organization identified access to credit through community development, credit-related projects, or financing programs as the biggest need.

During the evaluation period, the bank originated or purchased 2,346 home mortgage loans totaling \$313.4 million, 2,678 small loans to businesses totaling \$75.9 million, and 52 small loans to farms totaling \$411,000. Based on loan volume, examiners weighted small loans to businesses slightly more than home mortgage loans in determining the Lending Test rating for the Augusta-Richmond County, GA-SC Multistate MSA. Small loans to farms accounted for only 1 percent of the loan volume and therefore, carried little weight in the Lending Test rating.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN AUGUSTA-RICHMOND COUNTY, GA-SC MULTISTATE MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the Augusta-Richmond County, GA-SC Multistate MSA is rated High Satisfactory, based on excellent lending activity, good geographic distribution, and good borrower income distribution. The lack of CD lending has a negative effect on the Lending Test rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Augusta-Richmond County, GA-SC Multistate MSA is excellent.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 10.8 percent. The bank ranks third in deposits among 20 depository financial institutions operating in the multistate MSA, which places it in the top 15 percent of depository financial institutions. According to peer mortgage data for 2016, the bank has a market share of 1.7 percent based on the number of home mortgage loans originated or purchased. The bank ranks 17th among 378 home mortgage lenders, which places it in the top 5 percent of lenders. According to peer small business data for 2016, the bank has a market share of 6.9 percent based on the number of small loans to businesses originated or purchased. The bank ranks fifth among 89 small business lenders, which places it in the top 6 percent of lenders. According to peer farm data for 2016, the bank has a market share of 4.2 percent based on the number of small loans to farms originated or purchased. The bank ranks seventh among 21 farm lenders, which places it in the top 34 percent of lenders. Lending activity for home mortgage and small loans to businesses is excellent while it is poor for small loans to farms.

Table 1. Total Lending Volume												2012-2016	
LENDING VOLUME			Geography: MULTISTATE MSAs					Evaluation Period: January 1, 2012 to December 31, 2016					
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***	
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)		
Allentown, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00	
Augusta, GA/SC	100.00	2,346	313,412	2,678	75,905	52	411	0	0	5,076	389,728	100.00	
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00	
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00	
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00	
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00	
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00	
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00	
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00	
Portland, OR/WA	100.00	14,488	3,520,012	27,928	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00	
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00	
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00	
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00	
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00	
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00	

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
(****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is good. Geographic distribution performance is good in low-income geographies and the performance is good in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 3 percent is lower than the 3.4 percent of owner-occupied housing units in low-income geographies, but higher than the 1.4 percent for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 16.2 percent is significantly lower than the 25.3 percent of owner-occupied housing units in moderate-income geographies, but slightly higher than the 15.3 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Augusta-Richmond County GA-SC MSA	1,139	147,293	100.0	19,960	3.4	3.0	1.4	25.3	16.2	15.3	37.4	36.4	36.2	34.0	44.4	47.1	0.0	0.0	0.0
Total	1,139	147,293	100.0	19,960	3.4	3.0	1.4	25.3	16.2	15.3	37.4	36.4	36.2	34.0	44.4	47.1	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good. The bank’s distribution of small loans to businesses is good in low-income geographies and good in moderate-income geographies. The distribution of small loans to businesses in low-income geographies at 4.9 percent is lower than the 6.3 percent of the businesses that are located in low-income geographies and it is lower than the 5.4 percent for aggregate lenders. The distribution of small loans to businesses in moderate-income geographies at 17.9 percent is lower than the 23.3 percent of the businesses that are located in moderate-income geographies and slightly lower than 18.2 percent for aggregate lenders. The bank’s lending in moderate-income geographies is much closer to aggregate lending performance than its lending in low-income geographies.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Augusta-Richmond County GA-SC MSA	1,748	40,626	100.0	8,868	6.3	4.9	5.4	23.3	17.9	18.2	35.5	36.7	34.4	34.8	40.5	41.9	0.0	0.0	0.0
Total	1,748	40,626	100.0	8,868	6.3	4.9	5.4	23.3	17.9	18.2	35.5	36.7	34.4	34.8	40.5	41.9	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is poor. The bank’s distribution of small loans to farms is poor in low-income geographies and very poor in moderate-income geographies. The distribution of small loans to farms in low-income geographies at 0 percent is lower than the 2.5 percent of the farms that are located in low-income geographies and lower than 0.5 percent for aggregate lenders. Considering very few farms are located in low-income

geographies, which indicates fewer opportunities to make small loans to farms, performance is poor. The distribution of small loans to farms in moderate-income geographies at 12.9 percent is lower than the 28 percent of the farms that are located in moderate-income geographies and significantly lower than the 44.7 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Augusta-Richmond County GA-SC MSA	31	234	100.0	215	2.5	0.0	0.5	28.0	12.9	44.7	41.9	58.1	41.9	27.6	29.0	13.0	0.1	0.0	0.0
Total	31	234	100.0	215	2.5	0.0	0.5	28.0	12.9	44.7	41.9	58.1	41.9	27.6	29.0	13.0	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The distribution of home mortgage loans by borrower income is good. The distribution is adequate to low-income borrowers and the distribution is excellent to moderate-income borrowers. The proportion of home mortgage loans to low-income borrowers at 10 percent is lower than the 23.8 percent of families designated as low-income, which indicates very poor performance. However, the bank’s distribution performance is higher than the 4.5 percent for aggregate lenders. Considering the higher performance relative to all lenders, the distribution is poor to low-income borrowers. The proportion of home mortgage loans to moderate-income borrowers at 19.3 percent is higher than the 16.2 percent of families designated as moderate-

income. The bank’s performance in lending to moderate-income borrowers is higher than the 12.9 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Augusta-Richmond County GA-SC MSA	1,139	147,293	100.0	19,960	23.8	10.0	4.5	16.2	19.3	12.9	18.7	19.2	19.3	41.3	36.7	34.8	0.0	14.8	28.5
Total	1,139	147,293	100.0	19,960	23.8	10.0	4.5	16.2	19.3	12.9	18.7	19.2	19.3	41.3	36.7	34.8	0.0	14.8	28.5

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 32.3 percent of its small loans to businesses. Based on small loans to businesses with known revenues, the proportion of the bank’s small loans to businesses at 56.3 percent is lower than the 77.2 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 48.3 percent for the aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Augusta-Richmond County GA-SC MSA	1,748	40,626	100.0	8,868	77.2	56.3	48.3	4.2	11.4	18.7	32.3
Total	1,748	40,626	100.0	8,868	77.2	56.3	48.3	4.2	11.4	18.7	32.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 38.7 percent of its small loans to farms. Approximately 61.3 percent of the small loans to farms with known revenues were to farms with gross annual revenues of \$1 million or

less. The bank’s proportion of lending is lower than the 97.7 percent of farms with gross annual revenues of \$1 million or less, but higher than the 42.3 percent performance for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Augusta-Richmond County GA-SC MSA	31	234	100.0	215	97.7	61.3	42.3	1.5	0.0	0.9	38.7
Total	31	234	100.0	215	97.7	61.3	42.3	1.5	0.0	0.9	38.7

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a negative effect on the bank’s Lending Test performance in the Augusta-Richmond County, GA-SC Multistate MSA. During the five-year evaluation period, the bank did not originate or purchase any CD loans in the assessment area.

Product Innovation and Flexibility

The bank offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. The programs include America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. During the evaluation period, the bank originated more than 400 loans within the assessment area totaling \$42 million under various flexible lending programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 55 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank’s level of qualified investments.

The bank’s performance under the Investment Test in the Augusta-Richmond County, GA-SC Multistate MSA is rated Outstanding.

The bank made 71 community development investments during the evaluation period totaling \$9.9 million. Of the current period investments, the bank used approximately \$9.8 million or 99 percent of the investment dollars to help provide more than 80 units of affordable housing through the purchase of mortgage-backed securities. In addition, the bank has 26 investments totaling \$1.6 million it made during a prior evaluation period that are still outstanding and

continue to provide benefit to the community. The outstanding prior period and current period investments total \$11.4 million or approximately 10.6 percent of the bank’s total Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$9.7 million or 99 percent of the investment dollars.

Examples of significant community development investments include:

- The bank provided \$30,000 in grants to Habitat for Humanity to support local market building of affordable housing. The grants were part of a \$6 million national commitment to support the Bank of America/Habitat for Humanity Partnership Project.
- The bank provided a \$10,000 grant to Turn Back the Block, a faith-based non-profit organization with a mission to help revitalize the Harrisburg neighborhood through the rehabilitation of existing housing stock, new construction, and promotion of homeownership. Approximately 84 percent of the candidates for purchasing the homes have incomes at or below 80 percent of the area median income.

QUALIFIED INVESTMENTS	Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016					
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)	
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0	
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0	
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802	
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990	
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442	
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0	
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425	
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573	
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660	
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585	
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0	
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614	
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251	
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269	

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank’s retail banking services.

The bank’s performance under the Service Test in the Augusta-Richmond County, GA-SC Multistate MSA is rated Needs to Improve.

BANA’s service delivery systems in the Augusta-Richmond County, GA-SC Multistate MSA are unreasonably inaccessible to portions of its assessment area, particularly to low- or moderate-income geographies or to low- or moderate-income individuals. Examiners based conclusions on a comparison of the bank’s eight financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has no financial centers in low-income census tracts where 5.5 percent of the population lives. The bank has one financial center in a moderate-income geography, which represents 12.5 percent of its financial centers and 27.6 percent of the population.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank’s products and services. Alternative delivery systems have no effect on the retail banking services conclusion.

The bank has two financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to low-income geographies. These adjacent financial centers improve access of service delivery systems to low -income geographies and to low- or moderate-income individuals. However, neither of the two adjacent branches is open for Saturday banking.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened no financial centers and closed two. Both financial center closures were in moderate-income geographies, further limiting retail banking accessibility to low- and moderate-income geographies and individuals.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low-and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours vary throughout the assessment area. Some financial center lobby hours are 9:00 am to 5:00 pm Monday through Friday. Other financial center hours are from 9:00 am to 4:00 pm Monday through Friday. Four of the financial centers are open on Saturday from 9:00 am to 1:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Augusta-Richmond County GA-SC MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	9	7.6	31,332	5.5	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	36	30.3	156,152	27.6	1	12.5	6	24.0	0	0.0	2	100.0
Middle	43	36.1	212,585	37.6	4	50.0	9	36.0	0	0.0	0	0.0
Upper	30	25.2	164,804	29.2	3	37.5	10	40.0	0	0.0	0	0.0
NA	1	0.8	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	119	100.0	564,873	100.0	8	100.0	25	100.0	0	100.0	2	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

The bank is a leader in providing community development services within the Augusta-Richmond County, GA-SC Multistate MSA. The bank provides a high level of community development services. During the evaluation period, the bank participated with community development organizations to provide 142 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 58 low- and moderate-income individuals and provided 58 financial education seminars to 1,163 individuals, which were primarily students from low- and moderate-income families. Employees participated in 10 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 16 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Boston-Cambridge-Newton, MA-NH Multistate MSA

CRA rating for the Boston-Cambridge-Newton, MA-NH Multistate MSA³: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Excellent distribution of loans by geography and good distribution by borrower income or business revenue size;
- Relatively high level of CD lending;
- Excellent level and responsiveness of qualified investments; and
- Reasonably accessible service delivery systems to low- and moderate-income geographies and low- and moderate-income individuals.

Description of Institution's Operations in Boston-Cambridge-Newton, MA-NH Multistate MSA

The Boston-Cambridge-Newton, MA-NH Multistate MSA is Bank of America's sixth largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$62.3 billion or 5.2 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 129 depository financial institutions operating in the Boston-Cambridge-Newton, MA-NH Multistate MSA, Bank of America, with a deposit market share of 20.2 percent, is the second largest. Competitors with deposit market shares greater than 5 percent include State Street Bank and Trust Company (30.3 percent), Citizens Bank (10 percent), and Santander Bank (5 percent). As of December 31, 2016, the bank operated 171 full-service financial centers and 770 deposit-taking ATMs in the multistate MSA.

Refer to the community profile for the Boston-Cambridge-Newton, MA-NH Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Boston-Cambridge-Newton, MA-NH Multistate MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners discussed area community development needs with one local housing agency. According to the contact, affordable

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

housing is a key need in the area. In the Cambridge community, more than 65 percent of individuals and families with a Housing Choice Voucher are unable to locate a rental property owner that will accept it. The wait list for Housing Choice Vouchers in the Cambridge community is over 8,000 applications.

During the evaluation period, Bank of America originated or purchased 26,379 home mortgage loans totaling \$9.1 billion in the MSA compared to 57,911 small loans to businesses totaling \$2.1 billion, 182 small loans to farms totaling \$2.5 million, and 65 CD loans totaling \$492.7 million. Therefore, examiners weighted small loans to businesses more than home mortgage and small loans to farms in determining the Lending Test rating for the Boston-Cambridge-Newton, MA-NH Multistate MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN BOSTON-CAMBRIDGE-NEWTON, MA-NH MULTISTATE MMSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the Boston-Cambridge-Newton, MA-NH Multistate MSA is rated Outstanding, based on excellent lending activity, excellent geographic distribution, good borrower income distribution, and a relatively high level of CD lending that has a positive effect on the Lending Test rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Boston-Cambridge-Newton, MA-NH Multistate MSA is excellent.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 20.2 percent. The bank ranks second among 129 depository financial institutions in the multistate MSA, which places it in the top 2 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.2 percent based the number of home mortgage loans originated or purchased. The bank ranks seventh among 696 home mortgage lenders in the multistate MSA, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has a market share of 11.4 percent based on the number of small loans to businesses originated or purchased. The bank ranks third among 189 small business lenders, which places it in the top 2 percent of lenders. According to peer farm data for 2016, the bank has a market share of 28.5 percent. The bank ranks first among 20 farm lenders in the multistate MSA, which places it in the top 5 percent of lenders.

LENDING VOLUME												Geography: MULTISTATE MSAs		Evaluation Period: January 1, 2012 to December 31, 2016	
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***			
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)				
Allentown n, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00			
Augusta, GA/SC	100.00	2,346	313,412	2,678	75,905	52	411	0	0	5,076	389,728	100.00			
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00			
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00			
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00			
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00			
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00			
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00			
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00			
Portland, OR/WA	100.00	14,488	3,520,012	27,928	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00			
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00			
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00			
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00			
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00			
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00			

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
(****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is good. The bank’s home mortgage lending is good in low-income census tracts and adequate in moderate-income census tracts. The bank has underperformed the industry in low- and moderate-income geographies.

The distribution of the bank’s home mortgage loans in low-income geographies at 3.1 percent is consistent with the 3.1 percent of owner-occupied housing units in low-income geographies and below the 3.7 percent aggregate distribution. The distribution of home mortgage loans in moderate-income geographies at 10.8 percent is below the 13.9 percentage of owner-occupied housing units in moderate-income geographies and aggregate performance of 13.6 percent.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Boston-Cambridge-Newton MA-NH MSA	10,664	4,300,040	100.0	185,035	3.1	3.1	3.7	13.9	10.8	13.6	48.1	39.8	47.3	35.0	46.3	35.4	0.0	0.0	0.0
Total	10,664	4,300,040	100.0	185,035	3.1	3.1	3.7	13.9	10.8	13.6	48.1	39.8	47.3	35.0	46.3	35.4	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent overall. The distribution is good in low-income geographies and excellent in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 5.2 percent is slightly weaker than the 6.0 percent of businesses operating in low-income geographies and slightly weaker than the 5.3 percent aggregate performance. However, the proportion of the bank’s small loans to businesses in moderate-income geographies at 13.6 percent exceeds both the proportion of businesses in moderate-income geographies at 13.4 percent and aggregate performance of 13.3 percent.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Boston-Cambridge-Newton MA-NH MSA	37,045	1,242,660	100.0	116,612	6.1	5.2	5.3	13.4	13.6	13.3	41.4	39.0	43.0	38.9	42.0	38.2	0.2	0.2	0.2
Total	37,045	1,242,660	100.0	116,612	6.1	5.2	5.3	13.4	13.6	13.3	41.4	39.0	43.0	38.9	42.0	38.2	0.2	0.2	0.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is adequate overall. The distribution is adequate in low-income geographies and adequate in moderate-income geographies. The proportion of the bank’s small loans to farms in low-income geographies at 2 percent exceeds the 1.8 percent of small farms in low-income geographies, but less than the 3.6 percent for aggregate lenders. The bank’s proportion of small loans to farms in moderate-income geographies at 6.1 percent is below the 9.6 percent of small farms in moderate-income geographies and below the 7.7 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Boston-Cambridge-New ton MA-NH MSA	115	1,380	100.0	169	1.8	0.9	3.6	9.7	6.1	7.7	49.9	41.7	43.8	38.6	51.3	45.0	0.0	0.0	0.0
Total	115	1,380	100.0	169	1.8	0.9	3.6	9.7	6.1	7.7	49.9	41.7	43.8	38.6	51.3	45.0	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The bank’s distribution of home mortgage loans by borrower income is adequate overall. The distribution of home mortgage loans to low-income borrowers is very poor. Considering the bank performed better in lending to low-income borrowers than the aggregate lenders did, performance is adequate. The proportion of the bank’s home mortgage loans to low-income families at 6 percent is significantly weaker than the proportion of low-income families at 22.1 percent, but stronger than the 4 percent aggregate distribution. Examiners applied more weight to the bank’s performance relative to aggregate lenders due to the high cost of housing. The distribution of home mortgage loans to moderate-income borrowers is adequate. The proportion of home mortgage loans to moderate-income families at 13.1 percent is slightly below the proportion of moderate-income families at 16.7 percent and aggregate performance at 14.7 percent.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Boston-Cambridge-Newton MA-NH MSA	10,664	4,300,040	100.0	185,035	22.1	6.0	4.0	16.7	13.1	14.7	20.7	19.1	23.0	40.6	56.2	44.6	0.0	5.6	13.7
Total	10,664	4,300,040	100.0	185,035	22.1	6.0	4.0	16.7	13.1	14.7	20.7	19.1	23.0	40.6	56.2	44.6	0.0	5.6	13.7

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 33.2 percent of its small loans to businesses. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 55.7 percent is lower than the 76.8 percent of businesses with gross annual revenues of \$1 million or less. The performance is adequate. However, considering the bank’s distribution is stronger than the 44.6 percent for the aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Boston-Cambridge-Newton MA-NH MSA	37,045	1,242,660	100.0	116,612	83.4	55.7	44.6	7.2	11.1	9.4	33.2
Total	37,045	1,242,660	100.0	116,612	83.4	55.7	44.6	7.2	11.1	9.4	33.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 33 percent of its small loans to farms. Approximately 60 percent of the bank’s small loans to farms with known revenues were to farms with gross annual revenues of \$1 million or less. The bank’s proportion was weaker than the 95.1 percent of farms with gross annual revenues of \$1 million or less. The bank’s proportion of loans was stronger than the aggregate performance of 46.2 percent.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Boston-Cambridge-New ton MA-NH MSA	115	1,380	100.0	169	94.5	60.0	46.2	3.0	7.0	2.5	33.0
Total	115	1,380	100.0	169	94.5	60.0	46.2	3.0	7.0	2.5	33.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a positive effect on the bank's Lending Test performance in the Boston-Cambridge-Newton Multistate MSA. During the evaluation period, the bank originated 65 CD loans totaling \$492.7 million or 6.3 percent of the allocated Tier 1 Capital. CD loans were effective in helping the bank address community credit needs. The bank used approximately \$364 million or 74 percent of the CD loan dollars to provide more than 1,700 units of affordable housing for low- and moderate-income families. Additionally, approximately \$115 million or 23 percent of the amount financed projects that revitalize and stabilize low- and moderate-income geographies.

Examples of CD loans include:

- The bank extended \$11.2 million in construction financing to build a 144-unit multifamily affordable housing project in the city of Wareham. Units are restricted to renters with incomes at or below 60 percent of the area median income.
- The bank provided \$12.5 million in funding through Multifamily Revenue Bonds to finance a portion of the acquisition and rehabilitation costs to develop the fourth phase of Madison Park Village in the city of Roxbury. Madison Park Village is a residential community that provides 546 units of affordable housing for predominantly very low-income families.
- The bank provided \$37.5 million in construction financing to build the Riverway mixed-use project in a low-income census tract in the Longwood Medical Area of Boston. The three-phased project will include an 11-story building with 145 residential units and a daycare center. The residential units will comprise 60 LIHTC rental units restricted to incomes at or below 60 percent of the area median income and 85 mixed-income rental units. The bank also provided a LIHTC equity investment in the project.

BANA issued one Standby Letter of Credit totaling \$16.9 million to support construction financing for a multifamily affordable housing project. While Letters of Credit are not reportable as CD loans, they do support community development and thus receive positive consideration in the bank's CD lending performance.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's

Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. During the evaluation period, the bank originated 330 mortgage loans totaling \$39 million to low- and moderate-income borrowers in the Boston area through the Massachusetts Housing Partnership (MHP). Within the multistate MSA, lending under the MHA and HARP programs accounted for 81 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the Boston-Cambridge-Newton, MA-NH Multistate MSA is rated Outstanding.

The bank made 727 community development investments during the evaluation period totaling \$620 million. Approximately \$553.8 million or 89 percent of the current period investment dollars supported nearly 3,500 units of affordable housing. In addition, the bank has 205 community development investments totaling \$150.4 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$770 million or 9.9 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are generally innovative or complex with LIHTCs, Historic Tax Credits, and New Markets Tax Credits representing approximately \$395.5 million or 64 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$34.6 million in two Section 42 LIHTCs that support four affordable housing projects with 134 housing units.
- The bank invested \$2 million in the Boston Community Loan Fund, a local certified CDFI with a mission to create and preserve healthy communities where low-income people live and work. The CDFI finances various community development projects, including affordable housing, childcare, public education, healthcare facilities, and commercial revitalization projects.
- The bank made more than \$763,000 in grants to the Boston Private Industry Council, which works to strengthen Boston's communities and its workforce by connecting youth and adults with education and employment opportunities. The bank provided the grants to prepare, place, and pay more than 250 public high school students to work in non-profit organizations.

QUALIFIED INVESTMENTS		Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

The bank's performance under the Service Test in the Boston-Cambridge-Newton, MA-NH Multistate MSA is rated Low Satisfactory.

BANA's service delivery systems in the Boston-Cambridge-Newton, MA-NH Multistate MSA are reasonably accessible to geographies and individuals of different income levels, based on a comparison of the bank's 171 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has nine financial centers in low-income geographies representing 5.3 percent of its financial centers and 21 financial centers in moderate-income geographies representing 12.3 percent of its financial centers. According to the 2010 U.S. Census data, 8.6 percent of the population lives in low-income geographies and 18.7 percent lives in moderate-income geographies.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank's products and services. Alternative delivery systems have a positive effect on the retail banking services conclusion.

The bank has 14 financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to low- and moderate-income geographies. These adjacent

financial centers further improve access of service delivery systems to low- and moderate-income geographies and individuals.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened six financial centers in upper-income geographies and closed thirty-one. Only seven of the 31 financial centers closures were in low- and moderate-income geographies. Despite the closures, financial centers remain reasonably accessible to individuals and geographies of different income levels.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are consistent throughout the assessment area. Financial center lobby hours are typically 9:00 am to 4:00 pm Monday through Friday and 9:00 am to 12:00 pm on Saturday. A few financial centers are open until 1:00 pm on Saturday. Three financial centers have extended operating hours, which operate 11:00 am to 6:00 pm Monday through Friday and 11:00 am to 5:00 pm on Saturday. Approximately 83 percent of the financial centers in low- and moderate-income geographies have Saturday hours.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Boston-Cambridge-Newton MA-NH MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	105	10.4	393,638	8.6	9	5.3	70	9.1	0	0.0	2	6.5
Moderate	191	19.0	849,936	18.7	21	12.3	109	14.2	0	0.0	5	16.1
Middle	403	40.1	1,953,779	42.9	66	38.6	286	37.1	0	0.0	6	19.4
Upper	290	28.8	1,351,357	29.7	75	43.9	304	39.5	6	100.0	18	58.1
NA	17	1.7	3,692	0.1	0	0.0	1	0.1	0	0.0	0	0.0
Totals	1,006	100.0	4,552,402	100.0	171	100.0	770	100.0	6	100.0	31	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

The bank provides a relatively high level of community development services within the assessment area. During the evaluation period, the bank participated with community development organizations to provide 363 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 210 low- and moderate-income individuals and provided 25 financial education and foreclosure prevention workshops to 357 individuals that are primarily low- and moderate-income. Employees participated in 62 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 63 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Charlotte-Concord-Gastonia, NC-SC Multistate MSA

CRA rating for the Charlotte-Concord-Gastonia, NC-SC Multistate MSA⁴: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating:

- Excellent volume of loans originated /purchased within the assessment area;
- Adequate distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Adequate level of CD lending;
- Significant level and good responsiveness of qualified investments; and
- Accessible service delivery systems, particularly to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Charlotte-Concord-Gastonia, NC-SC Multistate MSA

The Charlotte-Concord-Gastonia, NC-SC Multistate MSA is Bank of America's second largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$149.6 billion or 12.4 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 45 depository financial institutions operating in the Charlotte-Concord-Gastonia, NC-SC Multistate MSA, Bank of America, with a deposit market share of 74.2 percent, is the largest. Wells Fargo Bank, with \$30.6 billion in deposits and 15.2 percent market share, is the assessment area's second largest depository financial institution. Other major banking competitors include Branch Banking and Trust with 3 percent market share. As of December 31, 2016, the bank operated 61 full-service financial centers and 229 deposit-taking ATMs in the multistate MSA.

Bank of America Corporation, BANA's parent company, also maintained nearly \$58.2 billion in deposits in the main financial center in Charlotte, NC. BAC used these deposits for general corporate purposes throughout the enterprise and they did not originate from customers within the assessment area. While these deposits were not excluded entirely from deposits reported within the assessment area, examiners treated them as performance context in areas where assessment area deposit market shares and volumes were used as comparators.

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

Refer to the community profile for the Charlotte-Concord-Gastonia, NC-SC Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Charlotte-Concord-Gastonia, NC-SC Multistate MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners contacted a local nonprofit housing organization and local economic development association to identify community development needs within the assessment area. According to the housing organization, the biggest challenge has been upward mobility. As Charlotte has experienced strong economic growth and strong growth in the luxury housing market, jobs and affordable housing for LMI remain a challenge as lower rent housing gets torn down and replaced with higher rent luxury projects. According to the economic association, local businesses have found it difficult to find skilled, reliable labor as businesses have expanded. In addition, the area has attracted several manufacturing operations from China, Japan, and Germany.

During the evaluation period, the bank originated or purchased 23,169 home mortgage loans totaling \$5 billion, 21,090 small loans to businesses totaling \$610 million, 97 loans to small farms totaling \$1.5 million, and 24 CD loans totaling \$109 million. Based on loan volume, examiners weighted home mortgage lending slightly more than small loans to businesses in determining the Lending Test rating for the Charlotte-Concord-Gastonia, NC-SC Multistate MSA. Small loans to farms accounted for less than 1 percent of the loan volume and thus carried very little weight in the Lending Test rating.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Charlotte-Concord-Gastonia, NC-SC Multistate MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the Charlotte-Concord-Gastonia, NC-SC Multistate MSA is rated High Satisfactory, based on excellent lending activity, adequate geographic distribution, and good distribution by borrower income.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Charlotte-Concord-Gastonia, NC-SC Multistate MSA is excellent.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 74.2 percent based on \$149.6 billion in deposits. However, nearly \$59 billion of the deposits are for Bank of America's general corporate uses and some are from companies located outside of the assessment area. If considering only deposits that originated from individuals and businesses located in the assessment area, the adjusted deposit market share would be

approximately 61.9 percent. The bank ranks first in deposits among 45 depository financial institutions operating in the multistate MSA, which places it in the top 3 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 4.3 percent based on the number of home mortgage loans originated or purchased. The bank ranks fourth among 710 home mortgage lenders in the multistate MSA, which places it in the top 1 percent of lenders. According to peer small business data for 2016, the bank has a market share of 10.3 percent based on the number of small loans to businesses originated or purchased. The bank ranks third among 163 small business lenders in the multistate MSA, which places it in the top 2 percent of lenders. According to peer farm data for 2016, the bank has a market share of 6.8 percent based on the number small loans to farms originated or purchased. The bank ranks sixth among 29 farm lenders, which places it in the top 21 percent of lenders. Home mortgage lending activity is excellent when considering the strong competition from more than 700 mortgage lenders and no institution has more than 5 percent market share except Wells Fargo Bank.

LENDING VOLUME		Geography: MULTISTATE MSAs						Evaluation Period: January 1, 2012 to December 31, 2016				
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Allentown n, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00
Augusta, GA/SC	100.00	2,346	313,412	2,678	75,905	52	411	0	0	5,076	389,728	100.00
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00
Portland, OR/WA	100.00	14,488	3,520,012	27,928	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
(****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects adequate penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is adequate. Geographic distribution performance is adequate in low-income geographies and the performance is poor in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 2.3 percent is lower than the 3.5 percent of owner-occupied housing units in low-income geographies and lower than the 2.6 percent for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 11 percent is significantly lower than the 20.7 percent of owner-occupied housing units in moderate-income geographies and lower than the 13.9 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Charlotte-Concord-Gastonia NC-SC MSA	11,944	2,689,847	100.0	98,644	3.5	2.3	2.6	20.7	11.0	13.9	39.6	30.5	35.4	36.1	56.1	48.1	0.0	0.1	0.0
Total	11,944	2,689,847	100.0	98,644	3.5	2.3	2.6	20.7	11.0	13.9	39.6	30.5	35.4	36.1	56.1	48.1	0.0	0.1	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. The bank’s small business lending is adequate in low-income geographies and adequate in moderate-income geographies. The distribution of small loans to businesses in low-income geographies at 6.6 percent is lower than the 7.7 percent of the businesses that are located in low-income geographies. The distribution of small loans to businesses in moderate-income geographies at 13.1 percent is lower than the 18.7 percent of the businesses that are located in moderate-income geographies.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Charlotte-Concord-Gastonia NC-SC MSA	14,236	379,630	100.0	49,880	7.7	6.6	7.5	18.7	13.1	15.2	32.7	28.8	32.3	40.0	50.8	44.1	0.9	0.7	0.8
Total	14,236	379,630	100.0	49,880	7.7	6.6	7.5	18.7	13.1	15.2	32.7	28.8	32.3	40.0	50.8	44.1	0.9	0.7	0.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is adequate. The bank’s small farm lending is poor in low-income geographies and adequate in moderate-income geographies. The distribution of small loans to farms in low-income geographies at 0 percent is significantly lower than the 3.6 percent of the farms that are located in low-income geographies. Considering very few farms are located in low-income geographies, which indicate fewer opportunities to make small loans to farms, performance is poor. The distribution of small loans to farms in moderate-income geographies at 15.4 percent is lower than the 20.5 percent of the farms that are located in moderate-income geographies.

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS Charlotte-Concord-Gastonia NC-SC MSA	65	894	100.0	334	3.6	0.0	1.8	20.5	15.4	21.9	48.0	41.5	62.0	27.7	41.5	14.4	0.2	5.0	0.0
Total	65	894	100.0	334	3.6	0.0	1.8	20.5	15.4	21.9	48.0	41.5	62.0	27.7	41.5	14.4	0.2	5.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The distribution of home mortgage loans by borrower income is good. The distribution is adequate to low-income borrowers and the distribution is good to moderate-income borrowers. The proportion of home mortgage loans to low-income borrowers at 7.8 percent is significantly lower than the 21.6 percent of families designated as low-income. However, the bank's distribution performance is stronger than the 5.3 percent for aggregate lenders. Considering the stronger performance relative to all lenders, the distribution is adequate to low-income borrowers. The proportion of home mortgage loans to moderate-income borrowers at 15 percent is close to the 17.5 percent of families designated as moderate-income. The bank's performance in lending to moderate-income borrowers is similar to the 14.5 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Charlotte-Concord-Gastonia NC-SC MSA	11,944	2,689,847	100.0	98,644	21.6	7.8	5.3	17.5	15.0	14.5	20.4	15.4	17.9	40.6	37.9	44.0	0.0	23.9	18.2
Total	11,944	2,689,847	100.0	98,644	21.6	7.8	5.3	17.5	15.0	14.5	20.4	15.4	17.9	40.6	37.9	44.0	0.0	23.9	18.2

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank's originations/purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 31.3 percent of its small loans to businesses. Based on small loans to businesses with known revenues, the proportion of the bank's small loans to businesses at 56.5 percent is lower than the 77.8 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 49.5 percent for the aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Charlotte-Concord-Gastonia NC-SC MSA	14,236	379,630	100.0	49,880	77.8	56.5	49.5	4.9	12.2	17.3	31.3
Total	14,236	379,630	100.0	49,880	77.8	56.5	49.5	4.9	12.2	17.3	31.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 30.8 percent of its small loans to farms. Approximately 66.2 percent of the bank’s small loans to farms with known revenues is to farms with gross annual revenues of \$1 million or less. The bank’s proportion of lending is lower than the 96.4 percent of farms with gross annual revenues of \$1 million or less, but higher than the 48.5 percent performance for aggregate lenders.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Charlotte-Concord-Gastonia NC-SC MSA	65	894	100.0	334	96.4	66.2	48.5	2.3	4.8	1.3	30.8
Total	65	894	100.0	334	96.4	66.2	48.5	2.3	4.8	1.3	30.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect on the bank’s Lending Test performance in the Charlotte-Concord-Gastonia, NC-SC Multistate MSA. The bank met the community’s credit needs primarily through retail lending. During the evaluation period, the bank originated 24 CD loans in the assessment area totaling \$109 million or 0.6 percent of the allocated Tier 1 Capital. CD lending was effective in helping to address some of the community development needs. The bank used approximately \$94 million or 86 percent of the CD loan dollars to provide more than 1,100 units of affordable housing for low- and moderate-income families. The bank used approximately \$13.7 million or 13 percent of the dollar volume to provide financing to businesses or organizations that provide essential services targeted to low- and moderate-income individuals.

While the allocated Tier 1 Capital considers the \$58.2 billion in deposits derived from outside the assessment area, excluding those deposits would marginally increase the percentage from 0.6 percent to 1 percent.

Examples of CD loans include:

- The bank originated a \$10 million loan to construct the 130-unit Atando Apartments. Financing for this multifamily housing project also included an investment in a \$6.8 million LIHTC by the bank. The loan increased the affordable housing supply and was

responsive to community needs as the average occupancy rates for existing low-income housing projects in the market was 99 percent. Several projects also have waiting lists.

- The bank provided \$8 million in financing to construct the 112-unit Allentown Street Apartments. The project restricts 60 units for seniors 55 and older and 52 units for families. All units are restricted to renters with incomes at 60 percent or less of the area median income. The financing is responsive due to the high demand for affordable housing.
- The bank provided \$8.3 million in construction financing to build a multi-use 160,000 square foot facility for Goodwill Industries. The organization and facility provide employment, job placement assistance, and training services for persons with vocational barriers. The new facility served more than 10,000 low- and moderate-individuals during its first year of operation. The transaction is complex given the involvement of New Markets Tax Credits funded through multiple sub-community development entities and a direct loan from the bank.

The bank issued three Letters of Credit totaling \$4.2 million for community development purposes. While Letters of Credit are not reportable as CD loans, the commitments support community development and thus receive positive consideration.

Product Innovation and Flexibility

The bank offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. The programs include America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. During the evaluation period, the bank originated more than 3,500 loans totaling \$417.7 million within the assessment area under various flexible lending programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 75 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test in the Charlotte-Concord-Gastonia, NC-SC Multistate MSA is rated High Satisfactory.

During the evaluation period, the bank made 674 community development investments totaling \$576.6 million in the Charlotte-Concord-Gastonia, NC-SC Multistate MSA. Of the current period investments, the bank used approximately \$436 million or 76 percent of the investment dollars to help provide more than 4,000 units of affordable housing. In addition, the bank has 300 community development investments totaling \$90.4 million it made during a prior

evaluation period that are still outstanding and continue to provide benefit to the community. The outstanding prior period and current period investments total \$667 million or approximately 3.6 percent of the bank’s total Tier 1 Capital allocated to the assessment area. After considering the effect of excluding approximately \$58.2 billion in deposits that did not derive from the assessment area, community development investments represent 5.9 percent of the allocated Tier 1 Capital. The majority of current period investments are generally neither innovative nor complex with mortgage-backed securities representing approximately \$347.7 million or 60 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$6.8 million in a LIHTC to support the development of Atando Avenue Apartments, a 130-unit low-income multi-family housing complex.
- The bank invested \$6 million in a LIHTC to support the development of Catawba Apartments, a 62-unit affordable housing development for seniors.
- The bank made nine contributions totaling \$10.1 million to the Foundation for the Carolinas to support various community development services for students at some of the most challenging schools in Charlotte. Schools targeted have more than 76 percent of the student body that is eligible to receive free or reduced lunches.

QUALIFIED INVESTMENTS		Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)	
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0	
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0	
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802	
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990	
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442	
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0	
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425	
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573	
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660	
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585	
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0	
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614	
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251	
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269	

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

The bank's performance under the Service Test in the Charlotte-Concord-Gastonia, NC-SC Multistate MSA is rated High Satisfactory.

BANA's service delivery systems in the Charlotte-Concord-Gastonia, NC-SC Multistate MSA are accessible to geographies and individuals of different income levels in the assessment area. Examiners based conclusions on a comparison of the bank's 61 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has four financial centers in low-income census tracts representing 6.6 percent of its financial centers and 10 financial centers in moderate-income census tracts representing 16.4 percent of its financial centers. According to the 2010 U.S. Census data, 7 percent and 23.7 percent of the population lives in low-income and moderate-income census tracts, respectively.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank's products and services. Alternative delivery systems have no effect on the retail banking services conclusion.

The bank has 14 financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to low- and moderate-income geographies. These adjacent financial centers improve access of service delivery systems to low- and moderate-income geographies and individuals.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened two financial centers in upper-income geographies and closed fourteen. The assessment area had two closures in low-income geographies, one in a moderate-income geography, and the remaining eleven closures in middle- and upper-income geographies. Despite the closures, financial centers remain accessible to individuals and geographies of different income levels.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are consistent throughout the assessment area. Financial center lobby hours are typically 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Charlotte-Concord-Gastonia NC-SC MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	49	9.1	155,165	7.0	4	6.6	16	7.0	0	0.0	2	14.3
Moderate	135	25.0	525,344	23.7	10	16.4	37	16.2	0	0.0	1	7.1
Middle	189	35.1	824,913	37.2	16	26.2	64	27.9	0	0.0	7	50.0
Upper	161	29.9	709,420	32.0	31	50.8	106	46.3	2	100.0	4	28.6
NA	5	0.9	2,170	0.1	0	0.0	6	2.6	0	0.0	0	0.0
Totals	539	100.0	2,217,012	100.0	61	100.0	229	100.0	2	100.0	14	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

The bank is a leader in providing community development services within the Charlotte-Concord-Gastonia, NC-SC MSA. The bank provides a high level of community development services. During the evaluation period, the bank participated with community development organizations to provide 726 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 576 low- and moderate-income individuals and 65 financial education and foreclosure prevention workshops to 733 individuals that are primarily from low- and moderate-income families. More than 50 employees participated in 50 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 35 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Kansas City, MO-KS Multistate MSA

CRA rating for the Kansas City, MO-KS Multistate MSA⁵: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating:

- Good volume of loans originated /purchased within the assessment area;
- Excellent distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Adequate level of CD loans;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems, particularly to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Kansas City, MO-KS Multistate MSA

The Kansas City, MO-KS Multistate MSA is Bank of America's 25th largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$5.5 billion or 0.5 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 135 depository financial institutions operating in the Kansas City, MO-KS Multistate MSA, Bank of America, with a deposit market share of 8.4 percent, is the fourth largest. Competitors with deposit market shares greater than 5 percent include Synchrony Bank (19.2 percent), UMB Bank (15.9 percent), Commerce Bank (10.7 percent), and U.S. Bank (5 percent). As of December 31, 2016, the bank operated 39 full-service financial centers and 96 deposit-taking ATMs in the multistate MSA.

Refer to the community profile for the Kansas City, MO-KS Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

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

Scope of Evaluation in Kansas City, MO-KS Multistate MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners contacted two local nonprofit housing and economic development associations to identify community development needs within the assessment area. According to both organizations, the biggest need is affordable housing. The assessment area has an insufficient stock of affordable housing units. Approximately 7,000 individuals and families are on the Section 8 housing waiting list. Another 4,000 are on the public housing waiting list. Other issues the organizations raised are abandoned and vacant housing units and the lack of a banking presence in Jackson County.

During the evaluation period, the bank originated or purchased 12,085 home mortgage loans totaling \$1.8 billion, 12,439 small loans to businesses totaling \$302.5 million, 145 small loans to farms totaling \$2.3 million, and 11 CD loans totaling \$22 million. Based on loan volume, examiners weighted small loans to businesses more than home mortgage loans in determining the Lending Test rating for the Kansas City, MO-KS Multistate MSA. Small loans to farms accounted for less than 1 percent of the loan volume and thus carried little to no weight in the Lending Test rating.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS CITY, MO-KS MULTISTATE MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the Kansas City, MO-KS MSA is rated High Satisfactory, based on good lending activity, excellent geographic distribution, and good borrower income distribution.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Kansas City, MO-KS MSA is good.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 8.4 percent based on \$5.5 billion in deposits. The bank ranks fourth in deposits among 135 depository financial institutions operating in the multistate MSA, which places it in the top 3 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.9 percent based on the number of home mortgage loans originated or purchased. The bank ranks 10th among 643 home mortgage lenders in the multistate MSA, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has a market share of 6.6 percent based on the number of small loans to businesses originated or purchased. The bank ranks fifth among 148 small business lenders, which places it in the top 4 percent of lenders. According to peer farm data for 2016, the bank has a market share of 4

percent based on the number of small loans to farms originated or purchased. The bank ranks eighth among 42 farm lenders, which places it in the top 20 percent of lenders.

LENDING VOLUME		Geography: MULTISTATE MSAs						Evaluation Period: January 1, 2012 to December 31, 2016				
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Allentown, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00
Augusta, GA/SC	100.00	2,346	313,412	2,676	75,905	52	411	0	0	5,076	389,728	100.00
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00
Portland, OR/WA	100.00	14,488	3,520,012	27,928	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
(****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is good. The geographic distribution performance is adequate in low-income geographies and the performance is good in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 2.4 percent is lower than the 4.9 percent of owner-occupied housing units in low-income geographies, but higher than the 1.6 percent for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 17 percent is lower than the 19.9 percent of owner-occupied housing units in moderate-income geographies, but higher than the 13.2 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Kansas City MO-KS MSA	5,263	844,875	100.0	86,796	4.9	2.4	1.6	19.9	17.0	13.2	39.6	37.0	38.1	35.6	43.6	47.1	0.0	0.0	0.0
Total	5,263	844,875	100.0	86,796	4.9	2.4	1.6	19.9	17.0	13.2	39.6	37.0	38.1	35.6	43.6	47.1	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. The bank’s distribution of small loans to businesses is good in low-income geographies and excellent in moderate-income geographies. The distribution of small loans to businesses in low-income geographies at 4.9 percent is lower than the 6.6 percent of the businesses that are located in low-income geographies and lower than the 5.4 percent for aggregate lenders. The distribution of small loans to businesses in moderate-income geographies at 18.6 percent is lower than the 20 percent of the businesses that are located in moderate-income geographies, but higher than the 17.3 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Kansas City MO-KS MSA	7,589	172,323	100.0	40,606	6.6	4.9	5.4	20.0	18.6	17.3	33.6	30.4	30.9	38.3	45.2	44.7	1.6	0.9	1.7
Total	7,589	172,323	100.0	40,606	6.6	4.9	5.4	20.0	18.6	17.3	33.6	30.4	30.9	38.3	45.2	44.7	1.6	0.9	1.7

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is good. The bank’s distribution of small loans to farms is poor in low-income geographies and excellent in moderate-income geographies. The distribution of small loans to farms in low-income geographies at 0 percent is significantly lower than the 2.2 percent of the farms that are located in low-income geographies and lower than the 0.4 percent for aggregate lenders. Considering very few farms are located in low-income geographies, which indicate fewer opportunities to make small loans to farms, performance is poor. The distribution of small loans to farms in moderate-income geographies

at 20 percent is consistent with the 20.8 percent of the farms that are located in moderate-income geographies and it is higher than the 18.9 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Kansas City MO-KS MSA	80	855	100.0	694	2.2	0.0	0.4	20.8	20.0	18.9	47.0	50.0	60.2	29.8	30.0	20.5	0.2	0.0	0.0
Total	80	855	100.0	694	2.2	0.0	0.4	20.8	20.0	18.9	47.0	50.0	60.2	29.8	30.0	20.5	0.2	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The distribution of home mortgage loans by borrower income is excellent. The distribution is good to low-income borrowers and the distribution is excellent to moderate-income borrowers. The proportion of home mortgage loans to low-income borrowers at 14.5 percent is lower than the 20.3 percent of families designated as low-income. However, the bank’s distribution performance is significantly higher than the 6.6 percent for aggregate lenders. Considering the stronger performance relative to all lenders, the distribution is good to low-income borrowers. The proportion of home mortgage loans to moderate-income borrowers at 20.6 percent is higher than the 17.6 percent of families designated as moderate-income. The bank’s performance in lending to moderate-income borrowers is also higher than the 15.8 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Kansas City MO-KS MSA	5,263	844,875	100.0	86,796	20.3	14.5	6.6	17.6	20.6	15.8	21.5	22.2	20.7	40.6	35.3	37.4	0.0	7.4	19.5
Total	5,263	844,875	100.0	86,796	20.3	14.5	6.6	17.6	20.6	15.8	21.5	22.2	20.7	40.6	35.3	37.4	0.0	7.4	19.5

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 34.7 percent of its small loans to businesses. Based on small loans to businesses with known revenues, the proportion of the bank’s small loans to businesses at 56.2 percent is lower than the 76.5 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 39.9 percent for the aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Kansas City MO-KS MSA	7,589	172,323	100.0	40,606	76.5	56.2	39.9	5.9	9.1	17.6	34.7
Total	7,589	172,323	100.0	40,606	76.5	56.2	39.9	5.9	9.1	17.6	34.7

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 41.3 percent of its small loans to farms. Approximately 50 percent of the bank’s small loans to farms with known revenues were to farms with gross annual revenues of \$1 million or less. The bank’s proportion of lending is lower than the 96.8 percent of farms with gross annual revenues of \$1 million or less, but is higher than the 48.1 percent performance for aggregate lenders.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Kansas City MO-KS MSA	80	855	100.0	694	96.8	50.0	48.1	1.8	8.8	1.4	41.3
Total	80	855	100.0	694	96.8	50.0	48.1	1.8	8.8	1.4	41.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect on the bank’s Lending Test performance in the Kansas City, MO-KS Multistate MSA. The bank met the community’s credit needs primarily through retail lending. During the evaluation period, the bank originated 11 CD loans in the assessment area totaling \$22 million or 3.2 percent of the allocated Tier 1 Capital. CD lending was effective in helping to address some of the community development needs. Borrowers used \$18.4 million or 84 percent of the loan dollars to provide 223 units of affordable housing for low- and moderate-income families and approximately \$3 million or 13 percent of the dollar volume to help revitalize and stabilize low- or moderate-income areas.

Examples of CD loans include:

- The bank originated a \$4.7 million construction loan to finance the construction of Rose Hill Townhomes, a 33-unit affordable housing project serving homeless tenants in the assessment area.
- The bank originated a \$2.9 million construction loan to finance the construction of Briar Creek Villas, a 48-unit affordable housing development for seniors aged 55 or older. Financing for this project also include a \$5.5 million investment in a LIHTC by the bank. Units are restricted to tenants with incomes at or below 60 percent of the area median income.
- The bank originated two loans totaling \$3 million to Local Initiatives Support Corporation (LISC), a nonprofit certified CDFI. While LISC is national in scope, LISC targeted the financing to community development activities within the assessment area.

The bank issued one Letter of Credit totaling \$5 million for community development purposes. While Letters of Credit are not reportable as CD loans, the commitments support community development and thus receive positive consideration.

Product Innovation and Flexibility

The bank offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. The programs include America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. During the evaluation period, the bank originated more than 2,700 loans totaling

\$272.3 million in the assessment area under various flexible lending programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 80 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test in the Kansas City, MO-KS Multistate MSA is rated Outstanding.

The bank made 98 community development investments during the evaluation period totaling \$52.4 million. Of the current period investments, approximately \$42.4 million (81 percent) of the investment dollars supported nearly 1,200 units of affordable housing. In addition, the bank has 75 investments totaling \$17.2 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. The outstanding prior period and current period investments total \$69.6 million or approximately 10.1 percent of the bank's total Tier 1 Capital allocated to the assessment area. The majority of current period investments are mostly innovative or complex with LIHTCs representing approximately \$37.7 million or 72 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$5.5 million in a LIHTC for the construction of Briar Creek Villas, a 48-unit affordable housing development for seniors aged 55 and over.
- The bank invested \$8 million in the Central Bank of Kansas City (CBKC), a minority-owned FDIC-insured depository institution. CBKC is also a certified CDFI and Community Development Entity (CDE). The investment will allow CBKC to help increase economic opportunity and promote community development through its business lending programs.
- The bank invested \$6.2 million in a LIHTC for the construction of Harrisonville Villas, a 48-unit affordable housing development targeted to renters with incomes at or below 60 percent of the area median income.

QUALIFIED INVESTMENTS		Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

The bank's performance under the Service Test in the Kansas City, MO-KS Multistate MSA is rated Outstanding.

BANA's service delivery systems in the Kansas City, MO-KS Multistate MSA are readily accessible to geographies and individuals of different income levels in the assessment area. Examiners based conclusions on a comparison of the bank's 39 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has five financial centers in low-income census tracts representing 12.8 percent of its financial centers and seven financial centers in moderate-income census tracts representing 17.9 percent of its financial centers. According to the 2010 U.S. Census data, 7.8 percent and 22.9 percent of the population lives in low-income and moderate-income census tracts, respectively.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank's products and services. Alternative delivery systems have a positive effect on the retail banking services conclusion.

The bank has 12 financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to low- and moderate-income geographies. These adjacent

financial centers improve access of service delivery systems to low- and moderate-income geographies and individuals.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center in a middle-income geography and closed 12 across the assessment area. The assessment area had six closures in moderate-income geographies. Despite the closures, service delivery systems remain reasonably accessible in moderate-income geographies and to moderate-income individuals.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low-and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are consistent throughout the assessment area. All financial centers are open 9:00 am to 4:00 pm Monday through Thursday, and 9:00 am to 5:00 pm on Friday. All financial centers, except one in a low-income geography, are open 9:00 am to 12:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Kansas City MO-KS MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	66	12.5	155,875	7.8	5	12.8	9	9.4	0	0.0	0	0.0
Moderate	129	24.3	459,387	22.9	7	17.9	21	21.9	0	0.0	6	50.0
Middle	175	33.0	754,553	37.6	15	38.5	40	41.7	1	100.0	4	33.3
Upper	144	27.2	639,285	31.8	12	30.8	26	27.1	0	0.0	2	16.7
NA	16	3.0	242	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	530	100.0	2,009,342	100.0	39	100.0	96	100.0	1	100.0	12	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

The bank provides a relatively high level of community development services in the Kansas City, MO-KS Multistate MSA. During the evaluation period, the bank participated with community development organizations to provide 268 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 182 low- and moderate-income individuals and provided 51 financial education and foreclosure prevention workshops to 670 individuals that are primarily low- to moderate-income. Employees participated in 27 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, eight employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA

**CRA rating for the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA⁶:
Satisfactory**

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Good distribution of loans by geography and adequate distribution by borrower income or business revenue size;
- Relatively high level of CD lending;
- Excellent level and responsiveness of qualified investments; and
- Reasonably accessible service delivery systems to low- and moderate-income geographies and low- and moderate-income individuals.

Description of Institution’s Operations in Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA

The Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA is Bank of America’s 42nd largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$601 million or 0.1 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 25 depository financial institutions operating in the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA, Bank of America, with a deposit market share of 7.9 percent, is the fourth largest. Competitors with deposit market shares greater than 5 percent include Branch Banking and Trust Company (24.1 percent), The Conway National Bank (10.7 percent), Wells Fargo Bank (9.3 percent), Crescom Bank (5.5 percent), and TD Bank (5.1 percent). As of December 31, 2016, the bank operated 9 full-service financial centers and 24 deposit-taking ATMs in the multistate MSA.

Refer to the community profile for the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

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

Scope of Evaluation in Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners discussed area community development needs with various local nonprofit organizations. The greatest need in the community are small business lending and job creation.

During the evaluation period, Bank of America originated or purchased 1,706 home mortgage loans totaling \$288.4 million, 1,636 small loans to businesses totaling \$31.7 million, and 8 small loans to farms totaling \$50,000. Home mortgage loans and small loans to businesses each represented nearly 50 percent of the loan volume and thus were weighted equally in arriving at the overall conclusion for the Lending Test. Due to the low volume of small loans to farms, any analyses would not be meaningful and thus not performed. In addition, small loans to farms represented less than 1 percent of the loan volume and thus carried very little weight in the overall Lending Test performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MYRTLE BEACH-CONWAY-NORTH MYRTLE BEACH, SC-NC MULTISTATE MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA is rated High Satisfactory, based on excellent lending activity, good geographic distribution, adequate borrower income distribution, and a relatively high level of CD lending that has a positive effect on the Lending Test rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA is excellent.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 7.9 percent. The bank ranks fourth in deposits among all depository financial institutions in the multistate MSA, which places it in the top 16 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.5 percent based on the number of home mortgage loans originated or purchased. The bank ranks sixth among 537 home mortgage lenders in the multistate MSA, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has a market share of 5.3 percent based on the number of small loans to businesses originated or purchased. The bank ranks seventh among 79 small business lenders in the multistate MSA, which places it in the top 9 percent of lenders. According to peer farm data for 2016, the bank has a market share of 2.5 percent based on the number of small loans to farms originated or purchased. The bank ranks

eighth among 16 farm lenders in the multistate MSA, which places it in the 50th percentile of farm lenders. Home mortgage lending activity is excellent after considering the strong competition from more than mortgage lenders. Similarly, small loans to businesses is excellent after considering the presence of lenders that specialize in making numerous small dollar business credit card loans. Lending activity for small loans to farms is poor.

LENDING VOLUME		Geography: MULTISTATE MSAs						Evaluation Period: January 1, 2012 to December 31, 2016				
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area**
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Allentown, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00
Augusta, GA/SC	100.00	2,346	313,412	2,676	75,905	52	411	0	0	5,076	389,728	100.00
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00
Portland, OR/WA	100.00	14,488	3,520,012	27,926	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
 (****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is adequate. The bank’s home mortgage lending is excellent in low-income census tracts and poor in moderate-income census tracts. Moderate-income distribution performance carried more weight considering the relatively few owner-occupied housing units in low-income geographies.

The distribution of the bank’s home mortgage loans in low-income geographies at 2.2 percent is higher than the 0.5 percent of owner-occupied housing units in low-income geographies and the 0.5 percent for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 5.7 percent is lower than the 15 percent of owner-occupied housing units in moderate-income geographies and 9.1 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	1,887	313,456	100.0	21,476	0.5	2.2	0.5	15.0	5.7	9.1	60.9	60.4	61.0	23.6	31.7	29.2	0.0	0.0	0.1
Total	1,887	313,456	100.0	21,476	0.5	2.2	0.5	15.0	5.7	9.1	60.9	60.4	61.0	23.6	31.7	29.2	0.0	0.0	0.1

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent overall. The distribution is excellent in low-income geographies and good in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 5.5 percent is higher than the 4.3 percent of businesses operating in low-income geographies and higher than the 4.3 percent for aggregate lenders. The proportion of the bank’s small loans to businesses in moderate-income geographies at 10.4 percent is lower than the 14.5 percent of businesses operating in moderate-income geographies and slightly lower than the 11.4 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	1,636	31,733	100.0	10,837	4.3	5.5	4.3	14.5	10.4	11.4	56.0	55.0	57.4	24.8	28.5	26.6	0.4	0.6	0.2
Total	1,636	31,733	100.0	10,837	4.3	5.5	4.3	14.5	10.4	11.4	56.0	55.0	57.4	24.8	28.5	26.6	0.4	0.6	0.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

Due to the low volume of small loans to farms, an analysis was not completed.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	8	50	100.0	118	0.6	0.0	0.0	17.4	62.5	15.3	65.5	60.0	79.7	16.4	0.0	5.1	0.1	0.0	0.0
Total	8	50	100.0	118	0.6	0.0	0.0	17.4	62.5	15.3	65.5	60.0	79.7	16.4	0.0	5.1	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is adequate. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The bank’s distribution of home mortgage loans by borrower income is adequate overall. The distribution is adequate to low-income borrowers and adequate to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income families at 5.4 percent is significantly lower than the 20.4 percent of low-income families and higher than the 3.5 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income families at 12.3 percent is lower than the proportion of moderate-income families at 17.6 percent, but near the aggregate lender performance at 12.4 percent.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	1,887	313,456	100.0	21,476	20.4	5.4	3.5	17.6	12.3	12.4	21.5	16.9	18.5	40.5	55.9	52.2	0.0	9.6	13.4
Total	1,887	313,456	100.0	21,476	20.4	5.4	3.5	17.6	12.3	12.4	21.5	16.9	18.5	40.5	55.9	52.2	0.0	9.6	13.4

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 33.9 percent of its small loans to businesses. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 57.9 percent is lower than the 78.4 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 49.6 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	1,636	31,733	100.0	10,837	78.4	57.9	49.6	4.1	8.2	17.5	33.9
Total	1,636	31,733	100.0	10,837	78.4	57.9	49.6	4.1	8.2	17.5	33.9

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

Due to the low volume of small loans to farms, an analysis was not completed.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA	8	50	100.0	118	97.7	62.5	71.2	1.4	0.0	0.9	37.5
Total	8	50	100.0	118	97.7	62.5	71.2	1.4	0.0	0.9	37.5

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Community Development Lending

CD lending has a positive effect on the bank’s Lending Test performance in the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA. During the evaluation period, the bank originated two CD loans totaling \$5.6 million or 7.5 percent of allocated Tier 1 Capital to help fund the construction of affordable housing.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 87 percent of the dollar volume of all loans in the assessment area under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank’s level of qualified investments.

Bank of America’s performance under the Investment Test in the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA is rated Outstanding.

The bank made 56 community development investments during the evaluation period totaling \$6.7 million. Approximately \$6.6 million or 99 percent of the current period investment dollars supported more than 330 units of affordable housing. In addition, the bank has 12 community development investments totaling \$892,000 it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$7.6 million or 10 percent of the bank’s Tier 1 Capital allocated to the assessment area. The majority of current period investments are generally neither

innovative nor complex with mortgage-backed securities representing approximately \$5.1 million or 77 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$455,000 in a fund that has direct and indirect investments in partnerships that own 471 affordable rental housing projects across the U.S., financed with federal LIHTCs. The investment amount is the portion that is specific to the Monticello Park housing project located within the assessment area.
- The bank invested nearly \$283,000 to the South Carolina Community Loan Fund, which is a certified CDFI that provides loans to finance construction and rehabilitation costs to support housing for low- and moderate-income individuals.
- The bank provided more than \$22,000 in grants to the Community Kitchen Inc. of Myrtle Beach, with a primary mission to feed the hungry. The Community Kitchen serves approximately 600 homeless and needy individuals daily and used the grants to purchase food and preparation equipment.

QUALIFIED INVESTMENTS	Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

The bank’s performance under the Service Test in the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA is rated Low Satisfactory.

BANA’s service delivery systems in the Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA are reasonably accessible to geographies and individuals of different income levels, based on a comparison of the bank’s nine financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has no financial centers in low-income geographies and one financial center in a moderate-income geography representing 11.1 percent of its financial centers. According to the 2010 U.S. Census data, 1.9 percent of the population lives in low-income geographies and 16.4 percent lives in moderate-income geographies.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank’s products and services. Alternative delivery systems have no effect on the retail banking services conclusion.

The bank has three financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to low- and moderate-income geographies. Of the three financial centers, one is adjacent to a low-income geography and two are adjacent to moderate-income geographies. These adjacent financial centers improve access of service delivery systems to low- and moderate-income geographies and individuals.

The bank did not open nor close any financial centers in the assessment area during the evaluation period.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial center lobby hours are 9:00 am to 5:00 pm Monday through Thursday, and 9:00 am to 6:00 pm on Friday. Five financial centers are open 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Myrtle Beach-Conway-N Myrtle Beach SC-NC MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	2	1.9	6,377	1.7	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	16	15.2	61,757	16.4	1	11.1	5	20.8	0	0.0	0	0.0
Middle	60	57.1	229,023	60.8	6	66.7	14	58.3	0	0.0	0	0.0
Upper	24	22.9	79,503	21.1	2	22.2	5	20.8	0	0.0	0	0.0
NA	3	2.9	62	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	105	100.0	376,722	100.0	9	100.0	24	100.0	0	100.0	0	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

The bank provides a relatively high level of community development services within the assessment area. During the evaluation period, the bank participated with community development organizations to provide 72 community development services targeted to low- and moderate-income individuals. Employees provided 63 financial education workshops to

843 homeless individuals and students that are primarily from low- and moderate-income families. Employees participated in one webinar with a non-profit organization to help the organization with capacity building. In addition, five employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

New York-Newark-Jersey City, NY-NJ Multistate MSA

CRA rating for the New York-Newark-Jersey City, NY-NJ Multistate MSA⁷: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Excellent distribution of loans by geography and good distribution by borrower income or business revenue size;
- Relatively high level of CD lending;
- Excellent level and responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and low- and moderate-income individuals.

Description of Institution's Operations in New York-Newark-Jersey City, NY-NJ Multistate MSA

The New York-Newark-Jersey City, NY-NJ Multistate MSA is Bank of America's third largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$121.9 billion or 10.1 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 199 depository financial institutions operating in the New York-Newark-Jersey City, NY-NJ Multistate MSA, Bank of America, with a deposit market share of 7.5 percent, is the second largest. The New York-Newark-Jersey City, NY-NJ Multistate MSA is home to some of the nation's largest financial institutions and competition is strong among 199 depository financial institutions. Banks in the multistate MSA with deposit market shares greater than 5 percent include JPMorgan Chase Bank (33.8 percent), Bank of New York (7.4 percent), HSBC Bank (7.2 percent), and Citibank (5.6 percent). As of December 31, 2016, the bank operated 437 full-service financial centers and 1,337 ATMs in the multistate MSA.

Examiners use a bank's deposit volume as an indicator of the bank's capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the New York-Newark-Jersey City, NY-NJ Multistate MSA, Bank of America reported an additional \$16 billion in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the multistate MSA by excluding these external deposits from the local deposit base gives a more accurate

⁷ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

indicator of the bank's capacity in the assessment area. Excluding those deposits in the multistate MSA would lower the bank's market share to approximately 6.4 percent.

Refer to the community profile for the New York-Newark-Jersey City, NY-NJ Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New York-Newark-Jersey City, NY-NJ Multistate MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners discussed area community development needs with various local nonprofit organizations. The organizations identified affordable housing as the primary need in the assessment area.

During the evaluation period, Bank of America originated or purchased 56,030 home mortgage loans totaling \$23.2 billion, 169,069 small loans to businesses totaling \$6.6 billion, 458 small loans to farms totaling \$4.7 million, and 205 CD loans totaling more than \$1 billion. Small loans to businesses represented nearly 75 percent of the loan volume and thus examiners weighted them more than home mortgage loans. Small loans to farms represented less than 1 percent of the loan volume and thus examiners weighted them very little in the overall Lending Test performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK-NEWARK-JERSEY CITY, NY-NJ MULTISTATE MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the New York-Newark-Jersey City, NY-NJ Multistate MSA is rated Outstanding, based on excellent lending activity, excellent geographic distribution, good borrower income distribution, and a relatively high level of CD lending that has a positive effect on the Lending Test rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the New York-Newark-Jersey City, NY-NJ Multistate MSA is good.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 7.5 percent. The bank ranks second in deposits among 199 depository financial institutions in the multistate MSA, which places it in the top 2 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.5 percent based on the number of home mortgage loans originated or purchased. The bank ranks seventh among 908 home

mortgage lenders in the multistate MSA, which places it in the top 1 percent of lenders. According to peer small business data for 2016, the bank has a market share of 6.2 percent based on the number of small loans to businesses originated or purchased. The bank ranks fifth among 307 small business lenders, which places it in the top 2 percent of lenders. According to peer farm data for 2016, the bank has a market share of 14.8 percent based on the number of small loans to farms originated or purchased. The bank ranks second among 32 farm lenders, which places it in the top 7 percent of lenders.

LENDING VOLUME		Geography: MULTISTATE MSAs						Evaluation Period: January 1, 2012 to December 31, 2016				
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Allentown, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00
Augusta, GA/SC	100.00	2,346	313,412	2,678	75,905	52	411	0	0	5,076	389,728	100.00
Boston, MA/NH/MSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00
New York, NY/NJ/MSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00
Philadelphia, PA/NJ/DE/MSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00
Portland, OR/WA	100.00	14,488	3,520,012	27,928	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00
Washington, DC/VA/MD/MSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
(****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is good. The bank’s home mortgage lending is good in low-income census tracts and adequate in moderate-income census tracts.

The distribution of the bank’s home mortgage loans in low-income geographies at 2.2 percent is slightly less than the 2.3 percent of owner-occupied housing units in low-income geographies and it is lower than the 2.7 percent aggregate distribution. The distribution of home mortgage loans in moderate-income geographies at 10.1 percent is lower than the 13.1

percent of owner-occupied housing units in moderate-income geographies and aggregate performance of 12.3 percent.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS New York-New ark-Jersey City MSA NY-NJ	26,201	12,188,256	100.0	359,882	2.3	2.2	2.7	13.1	10.1	12.3	35.9	27.1	32.7	48.7	60.6	52.2	0.0	0.0	0.0
Total	26,201	12,188,256	100.0	359,882	2.3	2.2	2.7	13.1	10.1	12.3	35.9	27.1	32.7	48.7	60.6	52.2	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent overall. The distribution is good in low-income geographies and excellent in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 6.1 percent is slightly lower than the 6.6 percent of businesses operating in low-income geographies and slightly lower than the 6.7 percent aggregate performance. The proportion of the bank’s small loans to businesses in moderate-income geographies at 16.6 percent is slightly lower than the 16.7 percent of businesses operating in moderate-income geographies and slightly higher than the 16.5 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS New York-New ark-Jersey City MSA NY-NJ	109,709	4,029,629	100.0	632,731	6.6	6.1	6.7	16.7	16.6	16.5	29.6	29.0	28.8	45.8	47.0	46.9	1.2	1.3	1.1
Total	109,709	4,029,629	100.0	632,731	6.6	6.1	6.7	16.7	16.6	16.5	29.6	29.0	28.8	45.8	47.0	46.9	1.2	1.3	1.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is good overall. The distribution is good in low-income geographies and good in moderate-income geographies. The proportion of the bank’s small loans to farms in low-income geographies at 2.3 percent is higher than the 2 percent of farms in low-income geographies, but lower than the 3 percent for aggregate lenders. Considering very few farms are located in low-income geographies, which indicate

fewer opportunities to make small loans to farms, performance is good. The bank’s proportion of small loans to farms in moderate-income geographies at 10.5 percent is slightly lower than the 11 percent of farms in moderate-income geographies and 11.3 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS New York-New ark-Jersey City MSA NY-NJ	304	3,551	100.0	604	2.0	2.3	3.0	11.0	10.5	11.3	35.6	23.4	32.5	51.3	63.8	52.8	0.1	0.0	0.5
Total	304	3,551	100.0	604	2.0	2.3	3.0	11.0	10.5	11.3	35.6	23.4	32.5	51.3	63.8	52.8	0.1	0.0	0.5

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The bank’s distribution of home mortgage loans by borrower income is adequate overall. The distribution is adequate to low-income borrowers and adequate to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income families at 3.1 percent is significantly lower than the 23.6 percent of low-income families and higher than the 2.5 percent for aggregate lenders. Examiners applied more weight to the bank’s performance relative to aggregate lenders due to the high cost of housing. Considering the affordability barriers to low-income borrowers in this high-cost assessment area, the bank’s distribution to low-income borrowers is adequate. The proportion of home mortgage loans to moderate-income families at 8.4 percent is lower than the proportion of moderate-income families at 16.1 percent, but near the aggregate lender performance at 10.5 percent.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS New York-New ark-Jersey City MSA NY-NJ	24,853	11,832,989	100.0	359,882	23.6	3.1	2.5	16.1	8.4	10.5	18.2	16.2	19.2	42.0	61.7	51.8	0.0	10.6	16.0
Total	24,853	11,832,989	100.0	359,882	23.6	3.1	2.5	16.1	8.4	10.5	18.2	16.2	19.2	42.0	61.7	51.8	0.0	10.6	16.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 33.6 percent of its small loans to businesses. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 53.8 percent is lower than the 78.7 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 42.4 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS New York-New ark-Jersey City MSA NY-NJ	109,709	4,029,629	100.0	632,731	78.7	53.8	42.4	6.3	12.6	15.1	33.6
Total	109,709	4,029,629	100.0	632,731	78.7	53.8	42.4	6.3	12.6	15.1	33.6

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 37.5 percent of its small loans to farms. Approximately 55.9 percent of the bank’s small loans to farms with known revenues were to farms with gross annual revenues of \$1 million or less. The bank’s proportion is lower than the 96.1 percent of farms with gross annual revenues of \$1 million or less. Considering the bank’s proportion of loans is higher than the aggregate performance of 32.3 percent, overall performance is adequate.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS New York-New ark-Jersey City MSA NY-NJ	304	3,551	100.0	604	96.1	55.9	32.3	2.6	6.6	1.3	37.5
Total	304	3,551	100.0	604	96.1	55.9	32.3	2.6	6.6	1.3	37.5

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a positive effect on the bank’s Lending Test performance in the New York-Newark-Jersey City, NY-NJ Multistate MSA. During the evaluation period, the bank originated 205 CD loans totaling more than \$1 billion or 6.6 percent of the allocated Tier 1 Capital. The loans were effective in helping the bank address community development needs. Approximately \$635.8 million or 62 percent of the loan dollars supported nearly 2,800 units of affordable housing for low- and moderate-income families. Additionally, \$187 million helped to promote economic development within the assessment area, while \$175 million helped fund organizations that provide community services targeted to low- and moderate-income individuals.

Examples of CD loans:

- The bank provided \$11.4 million in construction financing to develop Concern Amityville, a 60-unit affordable housing complex in Amityville, NY. All units are restricted to renters with incomes at or below 50 percent of the area median income. The bank also provided a LIHTC equity investment in the project.
- The bank provided \$23.5 million in financing for a “Tax Anticipation Note for 2016-2017 Taxes” for the Hempstead Union Free School District. The school district used the funds to finance its operating expenses in advance of receipt of real estate taxes levied for school purposes. For the 2015-2016 school year, approximately 75 percent of the students in the school district were eligible for free or reduced-price lunches.
- The bank provided \$13.6 million in construction financing for the new construction of Jericho Walton Apartments, a 90-unit apartment building in Bronx, NY. All units, except one reserved for the onsite building manager, are restricted to renters with incomes at or below 60 percent of the area median income.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 81 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the New York-Newark-Jersey City, NY-NJ Multistate MSA is rated Outstanding.

The bank made 908 community development investments during the evaluation period totaling \$1.3 billion. Approximately \$1.2 billion or 96 percent of the current period investment dollars supported nearly 12,600 units of affordable housing. In addition, the bank has 360 community development investments totaling \$290.7 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$1.6 billion or 10.3 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are generally innovative or complex with LIHTCs and New Markets Tax Credits representing approximately \$869 million or 67 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$18.5 million in a LIHTC to finance the construction of 162nd Street Apartments in a low-income geography in Bronx, NY. The project comprises 86 units that are restricted to renters with incomes at or below 60 percent of the area median income.
- The bank invested \$14.2 million in a LIHTC to finance the construction of Concern Amityville, a 60-unit supportive housing development on the site of the former North Amityville Armed Forces Reserve Center in Amityville, NY. All units are restricted to incomes at or below 50 percent of the area median income.
- The bank invested \$11.3 million in a LIHTC to finance the construction of ACMH, a 60-unit affordable housing project in a low-income geography in Bronx, NY. The units are restricted to renters with incomes at or below 60 percent of the area median income.

QUALIFIED INVESTMENTS		Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

The bank's performance under the Service Test in the New York-Newark-Jersey City, NY-NJ Multistate MSA is rated High Satisfactory.

BANA's service delivery systems in the New York-Newark-Jersey City, NY-NJ Multistate MSA are accessible to geographies and individuals of different income levels, based on a comparison of the bank's 437 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has 29 financial centers in low-income geographies representing 6.6 percent of its financial centers and 72 financial centers in moderate-income geographies representing 16.5 percent of its financial centers. According to the 2010 U.S. Census data, 11.1 percent of the population lives in low-income geographies and 23 percent lives in moderate-income geographies.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank's products and services. Alternative delivery systems positively affected the retail banking services conclusion.

The bank has 41 financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to low- and moderate-income geographies. Of the 41 financial centers, four are adjacent to low-income geographies and 37 are adjacent to moderate-income

geographies. These adjacent financial centers further improve access of service delivery systems to low- and moderate-income geographies and individuals.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened 26 financial centers and closed 84. The bank closed four financial centers in low-income geographies and nine financial centers in moderate-income geographies. Approximately 84 percent of the closures were in middle- and upper-income geographies. Despite the closures, financial centers remain accessible to individuals and geographies of different income levels.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial center lobby hours are primarily 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 5:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday. Financial centers in Manhattan have the most flexible hours. The financial centers are open 8:30 am to 6:00 pm Monday through Friday and 10:00 am to 2:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS New York-Newark-Jersey City MSA NY-NJ

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	504	10.8	2,170,327	11.1	29	6.6	122	9.1	1	3.8	4	4.8
Moderate	1,039	22.2	4,478,101	23.0	72	16.5	220	16.5	4	15.4	9	10.7
Middle	1,510	32.3	5,990,051	30.7	128	29.3	358	26.8	8	30.8	32	38.1
Upper	1,540	32.9	6,835,933	35.0	205	46.9	625	46.7	12	46.2	39	46.4
NA	88	1.9	35,629	0.2	3	0.7	12	0.9	1	3.8	0	0.0
Totals	4,681	100.0	19,510,041	100.0	437	100.0	1,337	100.0	26	100.0	84	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

The bank provides a relatively high level of community development services within the assessment area. During the evaluation period, the bank participated with community development organizations to provide 395 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 27 low- to moderate-income individuals and provided 137 financial education and foreclosure prevention workshops to 3,390 individuals that are primarily students from low- and moderate-income families. Employees participated in 117 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 113 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA

**CRA rating for the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA⁸:
Outstanding**

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Excellent distribution of loans by geography and good distribution by borrower income or business revenue size;
- Excellent level of CD lending;
- Excellent level and responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and low- and moderate-income individuals.

Description of Institution’s Operations in Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA

The Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA is Bank of America’s 17th largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$13.1 billion or 1.1 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 114 depository financial institutions operating in the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA, Bank of America, with a deposit market share of 2.9 percent, is the ninth largest. Financial institutions in the assessment area with deposit market shares greater than 5 percent include Capital One (22.2 percent), TD Bank (21.9 percent), Chase Bank USA (13.7 percent), and Wells Fargo Bank (7 percent). As of December 31, 2016, the bank operated 82 full-service financial centers and 167 deposit-taking ATMs in the MSA.

Refer to the community profile for the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

⁸ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Scope of Evaluation in Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners discussed area community development needs with various local nonprofit organizations. The organizations identified affordable housing as the primary need in the assessment area.

During the evaluation period, Bank of America originated or purchased 25,259 home mortgage loans totaling \$5.6 billion, 30,708 small loans to businesses totaling \$916.9 million, 167 small loans to farms totaling \$1.5 million, and 26 CD loans totaling more than \$1 billion. Small loans to businesses accounted for approximately 55 percent of loan volume by number of loans while home mortgage loans accounted for approximately 45 percent. Therefore, examiners weighted small loans to businesses more than home mortgage loans and small loans to farms. Small loans to farms represented 0.3 percent of the loan volume and thus examiners weighted them very little in the overall Lending Test performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA is rated Outstanding, based on excellent lending activity, excellent geographic distribution, good borrower income distribution, and a relatively high level of CD lending that has a significantly positive effect on the Lending Test rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA is excellent.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 2.9 percent. The bank ranks ninth in deposits among 114 depository financial institutions in the multistate MSA, which places it in the top 8 percent of depository financial institutions. According to peer mortgage data for 2016, the bank has a market share of 1.8 percent based on the number of home mortgage loans originated or purchased. The bank ranks eighth among 843 home mortgage lenders in the multistate MSA, which places it in the top 1 percent of lenders. According to peer small business data for 2016, the bank has a market share of 5.2 percent based on the number of small loans to businesses originated or purchased. The bank ranks seventh among 226 small business lenders, which places it in the top 4 percent of lenders. According to peer farm data for 2016, the bank has a market share of 7.1 percent

based on the number of small loans to farms originated or purchased. The bank ranks sixth among 32 farm lenders, which places it in the top 19 percent of lenders.

LENDING VOLUME		Geography: MULTISTATE MSAs						Evaluation Period: January 1, 2012 to December 31, 2016				
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Allentown, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00
Augusta, GA/SC	100.00	2,346	313,412	2,676	75,905	52	411	0	0	5,076	389,728	100.00
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00
Portland, OR/WA	100.00	14,488	3,520,012	27,926	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
(****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is good. The bank’s home mortgage lending is good in low-income census tracts and good in moderate-income census tracts.

The distribution of the bank’s home mortgage loans in low-income geographies at 2.3 percent is slightly lower than the 3.5 percent of owner-occupied housing units in low-income geographies, but higher than the 1.9 percent for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 16.2 percent is slightly lower than the 18.7 percent of owner-occupied housing units in moderate-income geographies, but is higher than the 15.9 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA	9,748	2,346,649	100.0	177,656	3.5	2.3	1.9	18.7	16.2	15.9	42.3	40.6	42.7	35.5	40.9	39.4	0.0	0.0	0.0
Total	9,748	2,346,649	100.0	177,656	3.5	2.3	1.9	18.7	16.2	15.9	42.3	40.6	42.7	35.5	40.9	39.4	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent overall. The distribution is good in low-income geographies and excellent in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 2.8 percent is lower than the 3.9 percent of businesses operating in low-income geographies and it is slightly lower than the 3 percent for aggregate lenders. The proportion of the bank’s small loans to businesses in moderate-income geographies at 16.5 percent is slightly less than the 17.2 percent of businesses operating in moderate-income geographies, but is higher than the 15.7 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA	19,042	539,638	100.0	127,813	3.9	2.8	3.0	17.2	16.5	15.7	38.0	38.6	38.5	40.4	41.8	42.4	0.5	0.2	0.4
Total	19,042	539,638	100.0	127,813	3.9	2.8	3.0	17.2	16.5	15.7	38.0	38.6	38.5	40.4	41.8	42.4	0.5	0.2	0.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is poor overall. The distribution is poor in low-income geographies and very poor in moderate-income geographies. The proportion of the bank’s small loans to farms in low-income geographies at 0 percent is lower than the 1 percent of farms in low-income geographies and it is consistent with the 0 percent for aggregate lenders. Considering that very few farms are located in low-income geographies, which indicate fewer opportunities to make small loans to farms, examiners weighted performance in moderate-income geographies more. The bank’s proportion of small loans to farms in

moderate-income geographies at 5.7 percent is significantly lower than the 13.5 percent of farms in moderate-income geographies and it is significantly lower than the 15.9 percent for aggregate lenders. Although farm lending is not a primary business focus for the bank, it actually performed better in lending to farms in upper-income geographies than the proportion of farms in upper-income geographies and aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA	106	1,015	100.0	515	1.0	0.0	0.0	13.5	5.7	15.9	46.4	38.7	51.3	39.0	55.7	32.8	0.1	0.0	0.0
Total	106	1,015	100.0	515	1.0	0.0	0.0	13.5	5.7	15.9	46.4	38.7	51.3	39.0	55.7	32.8	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the "Inside/Outside Ratio" section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The bank's distribution of home mortgage loans by borrower income is good overall. The distribution is adequate to low-income borrowers and excellent to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income families at 9.9 percent is significantly lower than the 21.1 percent of low-income families and higher than the 6.4 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income families at 17.4 percent is slightly lower than the proportion of moderate-income families at 17.5 percent and higher than the 15.9 percent for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA	9,748	2,346,649	100.0	177,656	21.1	9.9	6.4	17.5	17.4	15.9	21.0	20.0	20.2	40.5	38.6	37.5	0.0	14.1	20.0
Total	9,748	2,346,649	100.0	177,656	21.1	9.9	6.4	17.5	17.4	15.9	21.0	20.0	20.2	40.5	38.6	37.5	0.0	14.1	20.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 34.8 percent of its small loans to businesses. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 52.2 percent is lower than the 84.8 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 45 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA	19,042	539,638	100.0	127,813	84.8	52.2	45.0	6.2	13.0	9.0	34.8
Total	19,042	539,638	100.0	127,813	84.8	52.2	45.0	6.2	13.0	9.0	34.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 34.9 percent of its small loans to farms. Approximately 48.1 percent of the bank’s small loans to farms with known revenues were to farms with gross annual revenues of \$1 million or less. The bank’s proportion is significantly lower than the 94.3 percent of farms with gross annual revenues of \$1 million or less and it is lower than the 55.5 percent for aggregate lenders.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA	106	1,015	100.0	515	94.3	48.1	55.5	3.7	17.0	2.0	34.9
Total	106	1,015	100.0	515	94.3	48.1	55.5	3.7	17.0	2.0	34.9

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a significantly positive effect on the bank’s Lending Test performance in the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA. During the evaluation period, the bank originated 26 CD loans totaling \$1 billion or 62.2 percent of the allocated Tier 1 Capital. Approximately 93 percent of the loan dollars supported community development services and approximately 5 percent of the dollar volume helped to create nearly 600 units of affordable housing.

Examples of CD loans include:

- The bulk of CD lending is the result of the bank providing \$950 million in one-year tax exempt Tax and Revenue Anticipation Notes (TRAN) for the Philadelphia City School District. The notes provided financing for current operating expenses in advance of receipt of District taxes and current revenues expected during the operating year. The School District enrolls nearly 130,000 students and approximately 100 percent of the students are from economically disadvantaged families and are eligible to receive free meals.
- The bank provided \$8 million in construction financing to rehabilitate the Breslyn House Apartments, a 60-unit affordable housing project in the city of Philadelphia. All units are restricted to renters with incomes at or below 60 percent of the area median income.
- The bank provided \$10.2 million in construction financing for the Park Tower Apartments in the city of Philadelphia through the purchase of a tax-exempt bond. The housing project consists of 156 units of affordable housing that are restricted to the elderly (62 years and older) and disabled individuals. All units are restricted to renters with incomes at or below 60 percent of the area median income.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 84 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA is rated Outstanding.

The bank made 640 community development investments during the evaluation period totaling \$236.4 million. Approximately \$196 million or 83 percent of current period investment dollars supported more than 1,900 units of affordable housing. In addition, the bank has 293 community development investments totaling \$65.4 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$301.8 million or 18.4 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are generally neither innovative nor complex with mortgage-backed securities representing approximately \$126.5 million or 54 percent of the investment dollars.

Examples of community development investments include:

- The bank provided \$232,500 in grants to the Cathedral Soup Kitchen, which provides nutritious meals and donated food to individuals that are homeless, temporarily living with family or friends, or living below the federal poverty level. The grants are responsive to the identified need of feeding the hungry.
- The bank invested \$7 million in a LIHTC to finance the rehabilitation of Hollybush Gardens Apartments, a 252-unit housing project in Glassboro, NJ. The housing project has 227 units of affordable housing that are restricted to renters with incomes at or below 60 percent of the area median income.
- The bank invested nearly \$580,000 in The Reinvestment Fund, a CDFI and CDE that offers a number of products and programs related to affordable housing, charter school, childcare facilities, small business lending, and private equity investing. The funds were part of a \$4.8 million investment for a broader neighborhood revitalization effort in Baltimore, MD.

Table 14. Qualified Investments								2012-2016	
QUALIFIED INVESTMENTS		Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

The bank's performance under the Service Test in the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA is rated High Satisfactory.

BANA's service delivery systems in the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA are accessible to geographies and individuals of different income levels, based on a comparison of the bank's 82 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has 4 or 4.9 percent of its financial centers in low-income geographies and 16 or 19.5 percent of its financial centers in moderate-income geographies. According to the 2010 U.S. Census data, 6.6 percent of the population lives in low-income geographies and 22.1 percent lives in moderate-income geographies.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank's products and services. Alternative delivery systems have no effect on the retail banking services conclusion.

The bank has seven financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to low- and moderate-income geographies. Of the seven financial centers, three are adjacent to low-income geographies and four are adjacent to

moderate-income geographies. These adjacent financial centers help improve access of service delivery systems to low- and moderate-income geographies and individuals.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened five financial centers and closed 20. The bank closed one financial center in a low-income geography and three in moderate-income geographies. The bulk of the closures were in middle- and upper-income geographies. Middle-income geographies had 10 closures while upper-income geographies had six closures.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial center lobby hours are 9:00 am to 4:00 pm Monday through Thursday, and 9:00 am to 6:00 pm on Friday. Financial centers are generally open Saturday 9:00 am to 1:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	104	7.3	389,960	6.7	4	4.9	6	3.6	0	0.0	1	5.0
Moderate	331	23.1	1,287,621	22.2	16	19.5	25	15.0	1	20.0	3	15.0
Middle	546	38.1	2,252,676	38.9	33	40.2	62	37.1	1	20.0	10	50.0
Upper	433	30.2	1,848,423	31.9	28	34.1	66	39.5	3	60.0	6	30.0
NA	19	1.3	19,472	0.3	1	1.2	8	4.8	0	0.0	0	0.0
Totals	1,433	100.0	5,798,152	100.0	82	100.0	167	100.0	5	100.0	20	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

The bank provides a relatively high level of community development services within the assessment area. During the evaluation period, the bank participated with community development organizations to provide 399 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 56 low- and moderate-income individuals and provided 151 financial education and foreclosure prevention workshops for 3,576 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 89 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 70 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Portland-Vancouver-Hillsboro, OR-WA Multistate MSA

CRA rating for the Portland-Vancouver-Hillsboro, OR-WA Multistate MSA⁹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Excellent distribution of loans by geography and good distribution by borrower income or business revenue size;
- Excellent level of CD lending;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and low- and moderate-income individuals.

Description of Institution's Operations in Portland-Vancouver-Hillsboro, OR-WA Multistate MSA

The Portland-Vancouver-Hillsboro, OR-WA Multistate MSA is Bank of America's 23rd largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$9.2 billion or 0.8 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 35 depository financial institutions operating in the Portland-Vancouver-Hillsboro, OR-WA Multistate MSA, Bank of America, with a deposit market share of 19.9 percent, is the second largest. Financial institutions in the assessment area with deposit market shares greater than 5 percent include U.S. Bank (22 percent), Wells Fargo Bank (18.6 percent), JPMorgan Chase Bank (10.2 percent), KeyBank (6.9 percent), and Umpqua Bank (5.6 percent). As of December 31, 2016, the bank operated 50 full-service financial centers and 109 deposit-taking ATMs in the multistate MSA.

Refer to the community profile for the Portland-Vancouver-Hillsboro, OR-WA Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

⁹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Scope of Evaluation in Portland-Vancouver-Hillsboro, OR-WA Multistate MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners discussed area community development needs with various local nonprofit organizations. The contacts identified affordable housing as the primary need in the assessment area.

During the evaluation period, Bank of America originated or purchased 14,488 home mortgage loans totaling \$3.5 billion, 27,928 small loans to businesses totaling \$689.6 million, 317 small loans to farms totaling \$4.1 million, and 43 CD loans totaling \$93.1 million. Small loans to businesses accounted for approximately 65 percent of loan volume by number of loans while home mortgage loans accounted for approximately 34 percent. Therefore, examiners weighted small loans to businesses more than home mortgage loans and small loans to farms. Small loans to farms represented less than 1 percent of the loan volume and thus examiners weighted them very little in the overall Lending Test performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PORTLAND-VANCOUVER-HILLSBORO, OR-WA MULTISTATE MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the Portland-Vancouver-Hillsboro, OR-WA Multistate MSA is rated Outstanding, based on excellent lending activity, excellent geographic distribution, good borrower income distribution, and a relatively high level of CD lending that has a positive effect on the Lending Test rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Portland-Vancouver-Hillsboro, OR-WA Multistate MSA is excellent.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 19.9 percent. The bank ranks second in deposits among 35 depository financial institutions in the multistate MSA, which places it in the top 6 percent of depository financial institutions. According to peer mortgage data for 2016, the bank has a market share of 2 percent based on the number of home mortgage loans originated or purchased. The bank ranks 12th among 574 home mortgage lenders in the multistate MSA, which places it in the top 3 percent of lenders. According to peer small business data for 2016, the bank has a market share of 8.3 percent based on the number of small loans to businesses originated or purchased. The bank ranks fourth among 142 small business lenders, which places it in the top 3 percent of lenders. According to peer farm data for 2016, the bank has a market share of 12 percent based on the

number of small loans to farms originated or purchased. The bank ranks third among 17 farm lenders, which places it in the top 18 percent of lenders.

LENDING VOLUME		Geography: MULTISTATE MSAs						Evaluation Period: January 1, 2012 to December 31, 2016				
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Allentown, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00
Augusta, GA/SC	100.00	2,346	313,412	2,676	75,905	52	411	0	0	5,076	389,728	100.00
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00
Portland, OR/WA	100.00	14,488	3,520,012	27,928	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
 (****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is good. The bank’s home mortgage lending is excellent in low-income census tracts and adequate in moderate-income census tracts.

The distribution of the bank’s home mortgage loans in low-income geographies at 1.4 percent is slightly higher than the 1.3 percent of owner-occupied housing units in low-income geographies, but consistent with the 1.4 percent for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 15.9 percent is slightly lower than the 18.4 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 18.4 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Portland-Vancouver-Hillsboro OR-WA MSA	6,421	1,790,144	100.0	115,934	1.3	1.4	1.4	18.4	15.9	18.4	50.4	46.0	50.9	29.9	36.8	29.3	0.0	0.0	0.0
Total	6,421	1,790,144	100.0	115,934	1.3	1.4	1.4	18.4	15.9	18.4	50.4	46.0	50.9	29.9	36.8	29.3	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent overall. The distribution is excellent in low-income geographies and excellent in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 4.2 percent is near the 4.3 percent of businesses operating in low-income geographies and it is higher than the 3 percent for aggregate lenders. The proportion of the bank’s small loans to businesses in moderate-income geographies at 22.9 percent is slightly higher than the 22.6 percent of businesses operating in moderate-income geographies and it is higher than the 20.1 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Portland-Vancouver-Hillsboro OR-WA MSA	17,972	431,097	100.0	74,170	4.3	4.2	3.0	22.6	22.9	20.1	44.0	42.0	44.9	29.0	30.8	32.0	0.1	0.1	0.1
Total	17,972	431,097	100.0	74,170	4.3	4.2	3.0	22.6	22.9	20.1	44.0	42.0	44.9	29.0	30.8	32.0	0.1	0.1	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is adequate overall. The distribution is poor in low-income geographies and good in moderate-income geographies. The proportion of the bank’s small loans to farms in low-income geographies at 0 percent is lower than the 1.7 percent of farms in low-income geographies and it is lower than the 1.1 percent for aggregate lenders. Considering that very few farms are located in low-income geographies, which indicate fewer opportunities to make small loans to farms, examiners weighted performance in moderate-income geographies more. The bank’s proportion of small loans to farms in moderate-income geographies at 10 percent is lower than the 14.6 percent of farms in

moderate-income geographies and it is slightly higher than the 9.9 percent for aggregate lenders. Although farm lending is not a primary business focus for the bank, it actually performed better in lending to farms in middle-income geographies than the proportion of farms in middle-income geographies and aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms			Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Portland-Vancouver-Hillsboro OR-WA MSA	201	2,573	100.0	616	1.7	0.0	1.1	14.6	10.0	9.9	54.5	63.2	60.7	29.1	26.9	28.2	0.1	0.0	0.0
Total	201	2,573	100.0	616	1.7	0.0	1.1	14.6	10.0	9.9	54.5	63.2	60.7	29.1	26.9	28.2	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The bank’s distribution of home mortgage loans by borrower income is good overall. The distribution is adequate to low-income borrowers and good to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income families at 6.9 percent is significantly lower than the 20.5 percent of low-income families and higher than the 2.9 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income families at 14.2 percent is lower than the proportion of moderate-income families at 17.8 percent and it is slightly higher than the 14 percent for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Portland-Vancouver-Hillsboro OR-WA MSA	6,421	1,790,144	100.0	115,934	20.5	6.9	2.9	17.8	14.2	14.0	21.4	20.7	23.5	40.3	51.7	44.0	0.0	6.5	15.5
Total	6,421	1,790,144	100.0	115,934	20.5	6.9	2.9	17.8	14.2	14.0	21.4	20.7	23.5	40.3	51.7	44.0	0.0	6.5	15.5

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 33.5 percent of its small loans to businesses. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 52.8 percent is lower than the 79.2 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 40.5 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Portland-Vancouver-Hillsboro OR-WA MSA	17,972	431,097	100.0	74,170	79.2	52.8	40.5	4.3	13.7	16.5	33.5
Total	17,972	431,097	100.0	74,170	79.2	52.8	40.5	4.3	13.7	16.5	33.5

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 35.8 percent of its small loans to farms. Approximately 55.7 percent of the bank’s small loans to farms with known revenues were to farms with revenues of \$1 million or less. The bank’s proportion is significantly lower than the 95.5 percent of farms with revenues of \$1 million or less, but higher than the 51.9 percent for aggregate lenders

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Portland-Vancouver-Hillsboro OR-WA MSA	201	2,573	100.0	616	95.5	55.7	51.9	3.0	8.5	1.5	35.8
Total	201	2,573	100.0	616	95.5	55.7	51.9	3.0	8.5	1.5	35.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a positive effect on the bank’s Lending Test performance in the Portland-Vancouver-Hillsboro, OR-WA Multistate MSA. During the evaluation period, the bank originated 43 CD loans totaling \$93.1 million or 8 percent of the allocated Tier 1 Capital. Approximately 82 percent of the loan dollars helped provide nearly 600 units of affordable housing.

Examples of CD loans include:

- The bank provided \$7.1 million in construction financing for Phase 1 of the Glisan Commons housing project. Financing for this project also included the bank’s investment in an \$8.7 million LIHTC. The first phase development will provide 67 units of affordable housing with incomes restricted to 50 percent of the area median income. This financing is responsive as affordable housing projects in the Glisan Commons area had occupancy rates up to 98 percent and more than 600 households were on the waiting list for affordable housing at the time of the construction.
- The bank provided \$1.1 million in SBA 504 financing to a local coffee distributor. The loan helps to promote economic development through the financing of small businesses.
- The bank provided 17 loans totaling \$3.3 million to the Network for Oregon Affordable Housing (NOAH), a consortium of lenders for funding affordable housing development. Through the bank’s participation, it has helped create 117 units of affordable housing. The bank also provided \$1.1 million in financing for a community of 30 manufactured homes for very low-income individuals.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 87 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the Portland-Vancouver-Hillsboro, OR-WA Multistate MSA is rated Outstanding.

The bank made 145 community development investments during the evaluation period totaling \$102.5 million. Approximately \$97.7 million or 95 percent of the current period investment dollars supported nearly 650 units of affordable housing. In addition, the bank has 40 community development investments totaling \$21.7 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$124.2 million or 10.7 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are generally innovative or complex with LIHTCs representing \$68 million or 66 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$2.6 million in Craft3, a certified nonprofit CDFI and CDE that assists entrepreneurs and organizations in building viable business and market ventures that improve the social and environmental conditions of underserved communities in the Pacific Northwest. The CDFI used the funds from this investment to provide affordable energy efficiency (E2) retrofit loans in low- and moderate-income communities in Portland, OR and Seattle, WA.
- The bank invested \$10.2 million in a LIHTC to finance the construction of Freedoms Path, a 50-unit affordable housing development for veterans located on the Vancouver Medical Center Campus in Vancouver, WA. All units are restricted to veterans with incomes at or below 60 percent of the area median income.
- The bank invested \$8.7 million in LIHTCs to fund the construction of phase one of Glisan Commons, a 67-unit affordable housing project located in Portland, OR. All units are restricted to renters with incomes at or below 50 percent of the area median income.

Table 14. Qualified Investments								2012-2016	
QUALIFIED INVESTMENTS		Geography: MULTISTATE MSAs			Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

The bank's performance under the Service Test in the Portland-Vancouver-Hillsboro, OR-WA Multistate MSA is rated Outstanding.

BANA's service delivery systems in the Portland-Vancouver-Hillsboro, OR-WA Multistate MSA are readily accessible to geographies and individuals of different income levels, based on a comparison of the bank's 50 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has four financial centers (8 percent) in low-income geographies and 16 financial centers (32 percent) in moderate-income geographies. According to the 2010 U.S. Census data, 2.7 percent of the population lives in low-income geographies and 23.7 percent lives in moderate-income geographies.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank's products and services. Alternative delivery systems have a positive effect on the retail banking services conclusion.

The bank has 10 financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to low- and moderate-income geographies. Of the 10 financial centers, one is adjacent to a low-income geography and nine are adjacent to moderate-income

geographies. These adjacent financial centers help improve access of service delivery systems to low- and moderate-income geographies and individuals.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center and closed eleven. The bank closed two financial centers in low-income geographies and five in moderate-income geographies. Despite these closures, service delivery systems remain readily accessible to low- and moderate-income geographies and individuals.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial center lobby hours are 9:30 am to 5:30 pm Monday through Thursday, and 9:30 am to 6:00 pm on Friday. Financial centers are generally open Saturday 10:00 am to 1:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Portland-Vancouver-Hillsboro OR-WA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	14	2.9	59,875	2.7	4	8.0	9	8.3	0	0.0	2	18.2
Moderate	117	23.8	527,534	23.7	16	32.0	37	33.9	1	100.0	5	45.5
Middle	232	47.3	1,073,460	48.2	19	38.0	39	35.8	0	0.0	4	36.4
Upper	126	25.7	564,835	25.4	11	22.0	24	22.0	0	0.0	0	0.0
NA	2	0.4	305	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	491	100.0	2,226,009	100.0	50	100.0	109	100.0	1	100.0	11	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

The bank provides a relatively high level of community development services within the assessment area. During the evaluation period, the bank participated with community development organizations 117 community development services targeted to low- and moderate-income individuals. Employees provided 63 financial education and foreclosure prevention workshops to 857 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 31 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 22 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Providence-Warwick, RI-MA Multistate MSA

CRA rating for the Providence-Warwick, RI-MA Multistate MSA¹⁰: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Excellent distribution of loans by geography and good distribution by borrower income or business revenue size;
- Excellent level of CD lending;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and low- and moderate-income individuals.

Description of Institution's Operations in Providence-Warwick, RI-MA Multistate MSA

The Providence-Warwick, RI-MA Multistate MSA is Bank of America's 22nd largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$9.4 billion or 0.8 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 28 depository financial institutions operating in the Providence-Warwick, RI-MA Multistate MSA, Bank of America, with a deposit market share of 24.3 percent, is the second largest. Financial institutions in the assessment area with deposit market shares greater than 5 percent include Citizens Bank (28.7 percent), Santander Bank (9.3 percent), and The Washington Trust Company (7.1 percent). As of December 31, 2016, the bank operated 52 full-service financial centers and 172 deposit-taking ATMs in the multistate MSA.

Refer to the community profile for the Providence-Warwick, RI-MA Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

¹⁰This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Scope of Evaluation in Providence-Warwick, RI-MA Multistate MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners discussed area community development needs with various local nonprofit organizations. Contacts identified affordable housing as the primary need in the assessment area.

During the evaluation period, Bank of America originated or purchased 6,815 home mortgage loans totaling \$1.7 billion, 15,151 small loans to businesses totaling \$901.3 million, 114 small loans to farms totaling \$2.1 million, and 19 CD loans totaling \$102.5 million. Small loans to businesses accounted for approximately 68.6 percent of loan volume by number of loans while home mortgage loans accounted for approximately 30.9 percent. Therefore, examiners weighted small loans to businesses more than home mortgage loans and small loans to farms. Small loans to farms represented less than 1 percent of the loan volume and thus examiners weighted them very little in the overall Lending Test performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Providence-Warwick, RI-MA Multistate MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the Providence-Warwick, RI-MA MSA is rated Outstanding, based on excellent lending activity, excellent geographic distribution, good borrower income distribution, and a relatively high level of CD lending that has a positive effect on the Lending Test rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Providence-Warwick, RI-MA MSA is excellent.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 20.7 percent. The bank ranks second in deposits among 28 depository financial institutions in the multistate MSA, which places it in the top 8 percent of depository financial institutions. According to peer mortgage data for 2016, the bank has a market share of 1.5 percent based on the number of home mortgage loans originated or purchased. The bank ranks 20th among 472 home mortgage lenders in the multistate MSA, which places it in the top 5 percent of lenders. According to peer small business data for 2016, the bank has a market share of 10.3 percent based on the number of small loans to businesses originated or purchased. The bank ranks second among 119 small business lenders, which places it in the top 2 percent of lenders. According to peer farm data for 2016, the bank has a market share of 21.2 percent based on the number of small loans to farms originated or purchased. The bank ranks second among 14 farm lenders, which places it in the top 15 percent of lenders.

LENDING VOLUME												Geography: MULTISTATE MSAs		Evaluation Period: January 1, 2012 to December 31, 2016	
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***			
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)				
Allentown, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00			
Augusta, GA/SC	100.00	2,346	313,412	2,678	75,905	52	411	0	0	5,076	389,728	100.00			
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00			
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00			
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00			
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00			
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00			
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00			
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00			
Portland, OR/WA	100.00	14,488	3,520,012	27,928	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00			
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00			
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00			
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00			
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00			
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00			

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
(****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is good. The bank’s home mortgage lending is adequate in low-income census tracts and good in moderate-income census tracts.

The distribution of the bank’s home mortgage loans in low-income geographies at 3.5 percent is slightly lower than the 4 percent of owner-occupied housing units in low-income geographies and 4 percent for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 12.3 percent is slightly lower than the 12.9 percent of owner-occupied housing units in moderate-income geographies and it is slightly higher than the 12 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Providence-Warwick RH-MA MSA	2,631	692,859	100.0	52,267	4.0	3.5	4.0	12.9	12.3	12.0	44.7	39.8	43.7	38.3	44.3	40.3	0.0	0.0	0.0
Total	2,631	692,859	100.0	52,267	4.0	3.5	4.0	12.9	12.3	12.0	44.7	39.8	43.7	38.3	44.3	40.3	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent overall. The distribution is excellent in low-income geographies and excellent in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 8.5 percent is near the 8.9 percent of businesses operating in low-income geographies and it is consistent with the 8.5 percent for aggregate lenders. The proportion of the bank’s small loans to businesses in moderate-income geographies at 15.7 percent is near the 16.2 percent of businesses operating in moderate-income geographies and it is slightly higher than the 15.3 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Providence-Warwick RH-MA MSA	9,447	536,801	100.0	31,522	8.9	8.5	8.5	16.2	15.7	15.3	39.7	39.9	39.6	35.0	35.8	36.6	0.1	0.1	0.1
Total	9,447	536,801	100.0	31,522	8.9	8.5	8.5	16.2	15.7	15.3	39.7	39.9	39.6	35.0	35.8	36.6	0.1	0.1	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is adequate overall. The distribution is adequate in low-income geographies and adequate in moderate-income geographies. The proportion of the bank’s small loans to farms in low-income geographies at 3.8 percent is higher than the 3.4 percent of farms in low-income geographies and it is lower than the 7.7 percent for aggregate lenders. The bank’s proportion of small loans to farms in moderate-income geographies at 3.9 percent is lower than the 8.6 percent of farms in moderate-income geographies and it is lower than the 4.3 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Providence-Warwick RI-MA MSA	74	1,673	100.0	117	3.4	3.8	7.7	8.6	3.9	4.3	38.3	35.1	29.9	49.7	60.8	58.1	0.0	0.0	0.0
Total	74	1,673	100.0	117	3.4	3.8	7.7	8.6	3.9	4.3	38.3	35.1	29.9	49.7	60.8	58.1	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The bank’s distribution of home mortgage loans by borrower income is good overall. The distribution is adequate to low-income borrowers and excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income families at 7.8 percent is significantly lower than the 22.6 percent of low-income families, but is higher than the 4.2 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income families at 15.8 percent is lower than the proportion of moderate-income families at 16.9 percent and it is consistent with the 15.8 percent for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Providence-Warwick RI-MA MSA	2,631	692,859	100.0	52,267	22.6	7.8	4.2	16.9	15.8	15.8	20.1	20.6	22.5	40.5	44.3	39.9	0.0	11.6	17.5
Total	2,631	692,859	100.0	52,267	22.6	7.8	4.2	16.9	15.8	15.8	20.1	20.6	22.5	40.5	44.3	39.9	0.0	11.6	17.5

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The bank’s distribution of small loans to businesses with revenues of \$1 million or less is good. The revenue size of the business was not available for approximately 35.8 percent of the bank’s small loans to businesses. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 47.4 percent is lower than the 77.3 percent of businesses with revenues of \$1 million or less. Considering the bank’s distribution is higher than the 43.6 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Providence-Warwick RI-MA MSA	9,447	536,801	100.0	31,522	77.3	47.4	43.6	6.0	16.8	16.7	35.8
Total	9,447	536,801	100.0	31,522	77.3	47.4	43.6	6.0	16.8	16.7	35.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with revenues of \$1 million or less is poor. The bank did not collect or consider the farm gross revenues in the underwriting of approximately 48.6 percent of its small loans to farms. Approximately 44.6 percent of the bank’s small loans to farms with known revenues were to farms with revenues of \$1 million or less. The bank’s proportion is significantly lower than the 96.5 percent of farms with revenues of \$1 million or less and lower than the 56.4 percent for aggregate lenders

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Providence-Warwick RI-MA MSA	74	1,673	100.0	117	96.5	44.6	56.4	2.3	6.8	1.2	48.6
Total	74	1,673	100.0	117	96.5	44.6	56.4	2.3	6.8	1.2	48.6

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a positive effect on the bank’s Lending Test performance in the Providence-Warwick, RI-MA MSA. During the evaluation period, the bank originated 19 CD loans totaling \$102.4 million or 8.7 percent of the allocated Tier 1 Capital. Approximately 94 percent of the loan dollars supported the creation of more than 400 units of affordable housing.

Examples of CD loans include:

- The bank provided \$5.8 million in construction and bridge financing for the development of Ames Shovel Works, a 113-unit mixed-income rental apartment project in North Easton, MA. The project includes 30 units that are restricted to renters with incomes at or below 60 percent of the area median income with the remaining units rented at market rates.
- The bank provided \$14 million in construction financing for the Curtain Lofts, a 97-unit mixed income rental housing project for seniors (55 years and older). Rents for 63 of the units are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$9.8 million in construction financing for the development of Greenridge Apartments in the Village of Pascoag, RI. The 96-unit housing development is restricted to renters with incomes at or below 60 percent of the area median income.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 81 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the Providence-Warwick, RI-MA Multistate MSA is rated Outstanding.

The bank made 200 community development investments during the evaluation period totaling \$124.7 million. Approximately \$78.1 million or 63 percent of the current period investment dollars supported more than 1,000 units of affordable housing and \$41.7 million or 33 percent supported revitalization and stabilization efforts. In addition, the bank has 47 community development investments totaling \$22.3 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$147 million or 12.5 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are generally innovative or complex with LIHTCs, Historic Tax Credits, and New Markets Tax Credits representing \$80.5 million or 65 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$9.4 million in LIHTCs and Historic Tax Credits for the rehabilitation of the former Ames Shovel campus in North Easton, MA into a mixed-income residential community. The project will have 113 apartment units with 60 units restricted to renters with incomes at or below 60 percent of the area median income. The bank also provided construction financing and letter of credit.
- The bank purchased \$2.7 million in New Markets Tax Credit equity investments for the construction of a new headquarters building for Amos House. The organization provides food, housing, and social services to the homeless population of Providence. The new building will allow Amos House to consolidate all of its activities into one building. The bank also provided \$105,000 in grants to Amos House, which are responsive to identified needs for education, transitional housing, hunger relief, and workforce development.
- The bank purchased \$5 million in LIHTC equity investments for the rehabilitation of Constitution Hill in Woonsocket, RI. The project comprises 63 units of affordable housing with rents restricted to incomes at or below 60 percent of the area median income.

Table 14. Qualified Investments								2012-2016	
QUALIFIED INVESTMENTS		Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

The bank's performance under the Service Test in the Providence-Warwick, RI-MA Multistate MSA is rated Outstanding.

BANA's service delivery systems in the Providence-Warwick, RI-MA Multistate MSA are readily accessible to geographies and individuals of different income levels, based on a comparison of the bank's 52 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has eight or 15.4 percent of its financial centers in low-income geographies and nine or 17.3 percent of its financial centers in moderate-income geographies. According to the 2010 U.S. Census data, 10.4 percent of the population lives in low-income geographies and 19.2 percent lives in moderate-income geographies.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank's products and services. Alternative delivery systems have a positive effect on the retail banking services conclusion.

The bank has eight financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to moderate-income geographies. These adjacent

financial centers help improve access of service delivery systems to low- and moderate-income geographies and individuals.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened 2 financial centers and it closed 12. The bank closed seven financial centers in moderate-income geographies. Despite these closures, financial centers remain readily accessible to low- and moderate-income geographies and individuals.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial center lobby hours are generally 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 5:00 pm on Friday, and 9:00 am to 12:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Providence-Warwick RI-MA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	47	12.8	166,545	10.4	8	15.4	23	13.4	0	0.0	0	0.0
Moderate	77	20.9	307,975	19.2	9	17.3	27	15.7	2	100.0	7	58.3
Middle	137	37.2	621,070	38.8	21	40.4	83	48.3	0	0.0	4	33.3
Upper	104	28.3	505,259	31.6	14	26.9	38	22.1	0	0.0	1	8.3
NA	3	0.8	3	0.0	0	0.0	1	0.6	0	0.0	0	0.0
Totals	368	100.0	1,600,852	100.0	52	100.0	172	100.0	2	100.0	12	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

The bank provides a relatively high level of community development services within the assessment area. During the evaluation period, the bank participated with community development organizations to provide 107 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 5 low- and moderate-income individuals and provided 43 financial education and foreclosure prevention workshops for 886 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 15 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 43 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Salisbury, MD-DE Multistate MSA

CRA rating for the Salisbury, MD-DE Multistate MSA¹¹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Good distribution of loans by geography and good distribution by borrower income or business revenue size;
- No CD lending;
- Excellent level and responsiveness of qualified investments; and
- Reasonably accessible service delivery systems to low- and moderate-income geographies and low- and moderate-income individuals.

Description of Institution's Operations in Salisbury, MD-DE Multistate MSA

The Salisbury, MD-DE Multistate MSA is Bank of America's 43rd largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$282.6 million or less than 0.1 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 24 depository financial institutions operating in the Salisbury, MD-DE Multistate MSA, Bank of America, with a deposit market share of 0.5 percent, is the ninth largest. The largest depository financial institution in the assessment area is Discover Bank with \$50.5 billion in deposits and 88 percent market share. It operates one branch in the market. No other depository financial institution has more than 2.5 percent market share. Other large depository financial institutions operating in the assessment area with more than \$1 billion in deposits include second ranked PNC Bank with \$1.4 billion in deposits and third ranked Manufacturers and Traders Trust Company with \$1.1 billion in deposits. As of December 31, 2016, the bank operated 3 full-service financial centers and 11 deposit-taking ATMs in the multistate MSA.

Refer to the community profile for the Salisbury, MD-DE Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

¹¹This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Scope of Evaluation in Salisbury, MD-DE MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners discussed area community development needs with various local nonprofit organizations. The contacts identified affordable housing as the primary need in the assessment area.

During the evaluation period, Bank of America originated or purchased 897 home mortgage loans totaling \$236.3 million, 1,200 small loans to businesses totaling \$24.8 million, and 70 small loans to farms totaling \$1.6 million. Small loans to businesses accounted for approximately 55 percent of loan volume by number of loans while home mortgage loans accounted for approximately 41 percent. Therefore, examiners weighted small loans to businesses more than home mortgage loans and small loans to farms. Small loans to farms represented 3.2 percent of the loan volume and thus examiners weighted them very little in the overall Lending Test performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SALISBURY, MD-DE MULTISTATE MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the Salisbury, MD-DE MSA is rated High Satisfactory, based on excellent lending activity, good geographic distribution, and good borrower income distribution.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Salisbury, MD-DE MSA is excellent.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 0.5 percent. The bank ranks ninth in deposits among 24 depository financial institutions in the multistate MSA, which places it in the top 38 percent of depository financial institutions. According to peer mortgage data for 2016, the bank has a market share of 1.8 percent based on the number of home mortgage loans originated or purchased. The bank ranks 15th among 451 home mortgage lenders in the multistate MSA, which places it in the top 4 percent of lenders. According to peer small business data for 2016, the bank has a market share of 4.8 percent based on the number of small loans to businesses originated or purchased. The bank ranks eighth among 85 small business lenders, which places it in the top 10 percent of lenders. According to peer farm data for 2016, the bank has a market share of 9.1 percent based on the number of small loans to farms originated or purchased. The bank ranks fifth among 16 farm lenders, which places it in the top 32 percent of lenders.

LENDING VOLUME		Geography: MULTISTATE MSAs						Evaluation Period: January 1, 2012 to December 31, 2016				
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Allentown, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00
Augusta, GA/SC	100.00	2,346	313,412	2,678	75,905	52	411	0	0	5,076	389,728	100.00
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00
Portland, OR/WA	100.00	14,488	3,520,012	27,928	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
(****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is good overall. The bank did not originate or purchase home mortgage loans in low-income geographies. Considering the one low-income census tract has no owner-occupied housing units, examiners placed all weight on performance in moderate-income geographies.

The distribution of home mortgage loans in moderate-income geographies at 9.1 percent is lower than the 12.2 percent of owner-occupied housing units in moderate-income geographies, but is higher than the 8.2 percent for aggregate lenders. Performance is good.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Salisbury MD-DE MSA	911	238,225	100.0	16,943	0.0	0.0	0.0	12.2	9.1	8.2	70.1	65.0	69.4	17.6	25.9	22.4	0.0	0.0	0.0
Total	911	238,225	100.0	16,943	0.0	0.0	0.0	12.2	9.1	8.2	70.1	65.0	69.4	17.6	25.9	22.4	0.0	0.0	0.0

*Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good overall. The distribution is excellent in the low-income geography and adequate in moderate-income geographies. The proportion of the bank’s small loans to businesses in the low-income geography at 0.3 percent is consistent with the 0.3 percent of businesses operating in the low-income geography and it is slightly higher than the 0.2 percent for aggregate lenders. Due to the low opportunities for lending in the one low-income geography, examiners placed more weight on performance in moderate-income geographies. The proportion of the bank’s small loans to businesses in moderate-income geographies at 11.1 percent is lower the 14.5 percent of businesses operating in moderate-income geographies and it is lower than the 13.3 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Salisbury MD-DE MSA	1,200	24,773	100.0	8,198	0.3	0.3	0.2	14.5	11.1	13.3	65.7	60.9	63.6	19.5	27.7	22.8	0.1	0.0	0.0
Total	1,200	24,773	100.0	8,198	0.3	0.3	0.2	14.5	11.1	13.3	65.7	60.9	63.6	19.5	27.7	22.8	0.1	0.0	0.0

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is good overall. The distribution is adequate in the low-income geography and excellent in moderate-income geographies. The proportion of the bank’s small loans to farms in low-income geographies at 0 percent is lower than the 0.1 percent of farms in the low-income geography, but is consistent with the 0 percent for aggregate lenders. Considering that very few farms are located in the one low-income geography, which indicates fewer opportunities to make small loans to farms, examiners weighted performance in moderate-income geographies more. The bank’s proportion of small loans to farms in moderate-income geographies at 12.9 percent is slightly higher than the 12.1

percent of farms in moderate-income geographies and it is slightly lower than the 13.9 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Salisbury MD-DE MSA	70	1,619	100.0	252	0.1	0.0	0.0	12.1	12.9	13.9	76.7	82.9	79.4	10.8	13.0	5.6	0.3	0.0	1.2
Total	70	1,619	100.0	252	0.1	0.0	0.0	12.1	12.9	13.9	76.7	82.9	79.4	10.8	13.0	5.6	0.3	0.0	1.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The bank’s distribution of home mortgage loans by borrower income is good overall. The distribution is adequate to low-income borrowers and good to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income families at 6.7 percent is significantly lower than the 20 percent of low-income families and higher than the 3.7 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income families at 12.5 percent is lower than the proportion of moderate-income families at 18.7 percent, but is higher than the 10.6 percent for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Salisbury MD-DE MSA	911	238,225	100.0	16,943	20.0	6.7	3.7	18.7	12.5	10.6	21.8	15.5	16.1	39.5	56.3	52.7	0.0	9.0	16.9
Total	911	238,225	100.0	16,943	20.0	6.7	3.7	18.7	12.5	10.6	21.8	15.5	16.1	39.5	56.3	52.7	0.0	9.0	16.9

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 36.8 percent of its small loans to businesses. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 53.5 percent is lower than the 77.8 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 48.5 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Salisbury MD-DE MSA	1,200	24,773	100.0	8,198	77.8	53.5	48.5	4.2	9.8	18.0	36.8
Total	1,200	24,773	100.0	8,198	77.8	53.5	48.5	4.2	9.8	18.0	36.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 37.1 percent of its small loans to farms. Approximately 57.1 percent of the bank’s small loans to farms with known revenues were to farms with gross annual revenues of \$1 million or less. The bank’s proportion is significantly lower than the 96.8 percent of farms with gross annual revenues of \$1 million or less, but is higher than the 46 percent for aggregate lenders.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms w ith Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Salisbury MD-DE MSA	70	1,619	100.0	252	96.8	57.1	46.0	1.6	8.0	1.6	37.1
Total	70	1,619	100.0	252	96.8	57.1	46.0	1.6	8.0	1.6	37.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect on the bank’s Lending Test performance in the Salisbury, MD-DE MSA. The bank met the community’s credit needs primarily through retail lending. During the evaluation period, the bank did not purchase or originate any CD loans.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 92 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank’s level of qualified investments.

Bank of America’s performance under the Investment Test in the Salisbury, MD-DE Multistate MSA is rated Outstanding.

The bank made 101 community development investments during the evaluation period totaling \$18.8 million. Approximately \$18.3 million or 98 percent of the current period investment dollars supported more than 200 units of affordable housing. In addition, the bank has 76 community development investments totaling \$4.9 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$23.6 million or 66.6 percent of the bank’s Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$17.8 million or 95 percent of the investment dollars.

Examples of community development investments include:

- The bank made a \$25,000 contribution to the Delaware Community Reinvestment Action Council, with a mission to ensure equitable treatment and equal access to credit and capital through advocacy, education, legislation, and outreach in Delaware. The organization used the grant funds to help address foreclosure and pre-purchase counseling needs. More than 80 percent of the clients have incomes below 80 percent of the area median income.
- The bank made a \$25,000 contribution to First State Community Action Agency, with a mission to work towards the elimination of poverty and to make less severe the effects of poverty. The organization used the grant funds toward providing housing counseling and financial literacy training to low-income residents in rural Coverdale Crossroads.
- The bank made a \$12,500 contribution to Goodwill Industries of Delaware and Delaware County. The mission of Goodwill is to improve the quality of life for people with barriers to self-sufficiency through the "Power of Work". The organization used the grant funds to deploy the human and technological resources to build capacity to track job placement and retention.

QUALIFIED INVESTMENTS	Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

The bank’s performance under the Service Test in the Salisbury, MD-DE Multistate MSA is rated Low Satisfactory.

BANA’s service delivery systems in the Salisbury, MD-DE Multistate MSA are reasonably accessible to geographies and individuals of different income levels, based on a comparison of the bank’s three financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has no financial centers in low- or moderate-income geographies where 0.4 percent and 16.9 percent of the population lives, respectively.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank’s products and services. Alternative delivery systems have no effect on the retail banking services conclusion.

The bank has one financial center in an upper-income geography that is adjacent to or in very close proximity to a moderate-income geography that helps improve access to service delivery systems in the moderate-income geography and to low- and moderate-income individuals.

The bank did not open nor close any financial centers in the assessment area during the evaluation period.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial center lobby hours are 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 12:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Salisbury MD-DE MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	1	1.0	1,323	0.4	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	15	15.6	63,041	16.9	0	0.0	0	0.0	0	0.0	0	0.0
Middle	60	62.5	251,682	67.3	2	66.7	7	63.6	0	0.0	0	0.0
Upper	17	17.7	54,322	14.5	1	33.3	4	36.4	0	0.0	0	0.0
NA	3	3.1	3,434	0.9	0	0.0	0	0.0	0	0.0	0	0.0
Totals	96	100.0	373,802	100.0	3	100.0	11	100.0	0	100.0	0	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

The bank provides a relatively high level of community development services within the assessment area. During the evaluation period, the bank participated with community development organizations to provide 75 community development services targeted to low- and moderate-income individuals. Employees provided 42 financial education workshops for 1,089 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 12 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 12

employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

St. Louis, MO-IL Multistate MSA

CRA rating for the St. Louis, MO-IL Multistate MSA¹²: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Good distribution of loans by geography and good distribution by borrower income or business revenue size;
- Low level of CD lending;
- Excellent level and responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and low- and moderate-income individuals.

Description of Institution's Operations in St. Louis, MO-IL Multistate MSA

The St. Louis, MO-IL Multistate MSA is Bank of America's 18th largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$11.3 billion or 0.9 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 129 depository financial institutions operating in the St. Louis, MO-IL Multistate MSA, Bank of America, with a deposit market share of 11.9 percent, is the third largest. The largest depository financial institutions in the assessment area with more than 5 percent market shares include Scottrade Bank (15.5 percent), U.S. Bank, N.A. (14.2 percent), Stifel Bank and Trust (8.3 percent), and Commerce Bank (6.8 percent). As of December 31, 2016, the bank operated 52 full-service financial centers and 131 deposit-taking ATMs in the multistate MSA.

Refer to the community profile for the St. Louis, MO-IL Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in St. Louis, MO-IL Multistate MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners discussed area community

¹²This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

development needs with various local nonprofit organizations. The contacts identified affordable housing as the primary need in the assessment area.

During the evaluation period, Bank of America originated or purchased 16,573 home mortgage loans totaling \$2.7 billion, 18,521 small loans to businesses totaling \$489.2 million, 221 small loans to farms totaling \$3.4 million, and 10 CD loans totaling \$37.6 million. Small loans to businesses accounted for approximately 52 percent of loan volume by number of loans while home mortgage loans accounted for approximately 47 percent. Therefore, examiners weighted small loans to businesses slightly more than home mortgage. Small loans to farms represented less than 1 percent of the loan volume and thus examiners weighted them very little in the overall Lending Test performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN St. Louis, MO-IL Multistate MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the St. Louis, MO-IL Multistate MSA is rated High Satisfactory, based on excellent lending activity, good geographic distribution, and good borrower income distribution.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the St. Louis, MO-IL Multistate MSA is excellent.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 11.9 percent. The bank ranks third in deposits among 129 depository financial institutions in the multistate MSA, which places it in the top 3 percent of depository financial institutions. According to peer mortgage data for 2016, the bank has a market share of 1.8 percent based on the number of home mortgage loans originated or purchased. The bank ranks 12th among 647 home mortgage lenders in the multistate MSA, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has a market share of 7.2 percent based on the number of small loans to businesses originated or purchased. The bank ranks fourth among 155 small business lenders, which places it in the top 3 percent of lenders. According to peer farm data for 2016, the bank has a market share of 3.4 percent based on the number of small loans to farms originated or purchased. The bank ranks 10th among 34 farm lenders, which places it in the top 30 percent of lenders. Loan volumes for home mortgage lending is adequate after considering the strong competition from non-depository financial institutions. Small business lending is excellent after considering the bank's market share ranking among the competition. In addition, the average small business loan size for first ranked Citibank and third ranked American Express is \$12,000 compared to \$24,000 for Bank of America. The smaller loan amount indicates credit card lending, which tends to lead to higher loan volume and market share.

LENDING VOLUME		Geography: MULTISTATE MSAs						Evaluation Period: January 1, 2012 to December 31, 2016				
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Allentown, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00
Augusta, GA/SC	100.00	2,346	313,412	2,678	75,905	52	411	0	0	5,076	389,728	100.00
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00
Portland, OR/WA	100.00	14,488	3,520,012	27,928	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
(****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is good. The bank’s home mortgage lending is adequate in low-income census tracts and good in moderate-income census tracts.

The distribution of the bank’s home mortgage loans in low-income geographies at 2.5 percent is lower than the 4.3 percent of owner-occupied housing units in low-income geographies, but higher than the 1.3 percent for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 12.3 percent is lower than the 15.8 percent of owner-occupied housing units in moderate-income geographies, but higher than the 9.5 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS St Louis MO-IL MSA	6,823	1,195,920	100.0	123,633	4.3	2.5	1.3	15.8	12.3	9.5	46.8	43.6	45.5	33.1	41.6	43.6	0.0	0.0	0.0
Total	6,823	1,195,920	100.0	123,633	4.3	2.5	1.3	15.8	12.3	9.5	46.8	43.6	45.5	33.1	41.6	43.6	0.0	0.0	0.0

*Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good overall. The distribution is adequate in low-income geographies and good in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 3.3 percent is lower than the 5.5 percent of businesses operating in low-income geographies and it is lower than the 4.6 percent for aggregate lenders. The proportion of the bank’s small loans to businesses in moderate-income geographies at 13 percent is lower than the 15.6 percent of businesses operating in moderate-income geographies and it is lower than the 14.3 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS St Louis MO-IL MSA	11,518	284,849	100.0	56,997	5.5	3.3	4.6	15.6	13.0	14.3	40.8	35.8	37.7	38.1	47.8	43.3	0.1	0.1	0.1
Total	11,518	284,849	100.0	56,997	5.5	3.3	4.6	15.6	13.0	14.3	40.8	35.8	37.7	38.1	47.8	43.3	0.1	0.1	0.1

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is excellent overall. The distribution is excellent in low-income geographies and excellent in moderate-income geographies. The proportion of the bank’s small loans to farms in low-income geographies at 2.2 percent is higher than the 1.3 percent of farms in low-income geographies and it is higher than the 0.4 percent for aggregate lenders. Considering that very few farms are located in low-income geographies, which indicates fewer opportunities to make small loans to farms, examiners weighted performance in moderate-income geographies more. The bank’s proportion of small loans to farms in moderate-income geographies at 10.1 percent is lower than the 11 percent of farms in moderate-income geographies and it is higher than the 5.9 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS St Louis MO-IL MSA	135	2,649	100.0	1,233	1.3	2.2	0.4	11.0	10.1	5.9	57.3	57.8	73.1	30.3	34.1	20.6	0.0	0.0	0.0
Total	135	2,649	100.0	1,233	1.3	2.2	0.4	11.0	10.1	5.9	57.3	57.8	73.1	30.3	34.1	20.6	0.0	0.0	0.0

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The bank’s distribution of home mortgage loans by borrower income is excellent overall. The distribution is good to low-income borrowers and excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income families at 13.1 percent is lower than the 20.9 percent of low-income families and higher than the 6.1 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income families at 19.5 percent is higher than the proportion of moderate-income families at 17.1 percent and it is higher than the 15.8 percent for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate
FS St Louis MO-IL MSA	6,823	1,195,920	100.0	123,633	20.9	13.1	6.1	17.1	19.5	15.8	21.2	20.7	18.7	40.7	36.0	36.6	0.0	10.6	22.7
Total	6,823	1,195,920	100.0	123,633	20.9	13.1	6.1	17.1	19.5	15.8	21.2	20.7	18.7	40.7	36.0	36.6	0.0	10.6	22.7

*Source: 2010 U.S Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 34.6 percent of its small loans to businesses. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 54.7 percent is lower than the 75.8 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 42.7 percent for aggregate lenders, overall performance is good.

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
FS St Louis MO-IL MSA	11,518	284,849	100.0	56,997	75.8	54.7	42.7	6.3	10.7	17.9	34.6
Total	11,518	284,849	100.0	56,997	75.8	54.7	42.7	6.3	10.7	17.9	34.6

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 39.3 percent of its small loans to farms. Approximately 59.3 percent of the bank’s small loans to farms with known revenues were to farms with gross annual revenues of \$1 million or less. The bank’s proportion is lower than the 97.2 percent of farms with gross annual revenues of \$1 million or less and lower than the 64.1 percent for aggregate lenders

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS St Louis MO-IL MSA	135	2,649	100.0	1,233	97.2	59.3	64.1	1.7	4.3	1.1	39.3
Total	135	2,649	100.0	1,233	97.2	59.3	64.1	1.7	4.3	1.1	39.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect on the bank’s Lending Test performance in the St. Louis, MO-IL Multistate MSA. The bank met the community’s credit needs primarily through retail lending. During the evaluation period, the bank originated 10 CD loans totaling \$37.6 million or 2.7

percent of the allocated Tier 1 Capital. Approximately 88 percent of the loan dollars supported the creation of nearly 300 units of affordable housing.

Examples of CD loans include:

- The bank provided \$5.5 million in financing to construct Green Gables II Senior Living Phase 2, a 48-unit affordable housing project. Units are for seniors (55 years and older) and are restricted to incomes at or below 60 percent of the area median income. The financing is responsive to identified needs for affordable housing. Phase 1, also with 48-units, is fully leased with a waiting list of at least 40 individuals. Vacancy rates for low-income seniors at other area housing projects are low at less than 1 percent.
- The bank provided \$5.4 million in financing for the acquisition and renovation of the Landings at Belle Meadows, an existing 60-unit affordable housing project in Alton, IL. The financing created no new affordable housing, but rather funding allowed preservation of the existing property to continue serving low-income households in the area. The units are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$280,000 in financing to a non-profit corporation created to promote housing savings and economic development for low- and moderate-income families. The borrower used the funds to finance loans under the SBA Community Advantage 7(a) program and it expects it will place 80 percent of its Community Advantage loans with low- and moderate-income individuals with a projection of 3-5 full-time jobs created per loan. The funding is responsive as access to small business capital is a need identified in the community.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 82 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the St. Louis, MO-IL Multistate MSA is rated Outstanding.

The bank made 164 community development investments during the evaluation period totaling \$108.3 million. Approximately \$105.3 million or 97 percent of the current period investment dollars supported nearly 1,900 units of affordable housing. In addition, the bank has 136 community development investments totaling \$35.3 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$143.6 million or 10.2 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are generally innovative or complex with LIHTCs representing approximately \$64 million or 59 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$4.9 million in a Section 42 LIHTC Fund, which invested in a LIHTC to finance the Oak View Village II affordable housing project in Union, MO. The project consists of 49 two-bedroom units restricted to renters with incomes at or below 60 percent of the area median income.
- The bank invested \$5.9 million in a LIHTC to finance the development of Bluff View Apartments, a 40-unit senior housing project. All units are restricted to renters with incomes at or below 60 percent of the area median income.
- The bank invested \$5.7 million in a LIHTC to fund the construction of Green Gables Phase II, a 48-unit affordable housing development in Wentzville, MO for seniors aged 55 and older. All units are restricted to renters with incomes at or below 60 percent of the area median income.

QUALIFIED INVESTMENTS		Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)	
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0	
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0	
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802	
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990	
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442	
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0	
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425	
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573	
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660	
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585	
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0	
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614	
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251	
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269	

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

The bank's performance under the Service Test in the St. Louis, MO-IL Multistate MSA is rated High Satisfactory.

BANA's service delivery systems in the St. Louis, MO-IL Multistate MSA are accessible to geographies and individuals of different income levels, based on a comparison of the bank's 52 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has two or 3.8 percent of its financial centers in low-income geographies compared to 7.6 percent of the population in those geographies. The bank has nine or 17.3 percent of its financial centers in moderate-income geographies compared to 17.6 percent of population in those geographies.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank's products and services. Alternative delivery systems have a positive effect on the retail banking services conclusion.

The bank has seven financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to low- and moderate-income geographies. Of the seven financial centers, two are adjacent to low-income geographies and five are adjacent to moderate-income geographies. These adjacent financial centers help improve access of service delivery systems to low- and moderate-income geographies and individuals.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank did not open any financial centers and it closed eight. The bank closed five financial centers in moderate-income geographies. Despite these closures, service delivery systems remain accessible to low- and moderate-income geographies and individuals.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are consistent throughout the assessment area. Financial center lobby hours are 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 5:00 pm on Friday, and 9:00 am to 12:00 pm on Saturday. All financial centers have the same operating hours except one financial center located in an upper-income geography, where the hours are 11:00 am to 4:00 pm Monday through Friday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS St Louis MO-IL MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	75	12.2	211,336	7.6	2	3.8	7	5.3	0	0.0	0	0.0
Moderate	116	18.9	490,536	17.6	9	17.3	23	17.6	0	0.0	5	62.5
Middle	256	41.6	1,235,480	44.3	15	28.8	36	27.5	0	0.0	0	0.0
Upper	166	27.0	849,189	30.5	26	50.0	65	49.6	0	0.0	3	37.5
NA	2	0.3	1,160	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	615	100.0	2,787,701	100.0	52	100.0	131	100.0	0	100.0	8	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

The bank provides a relatively high level of community development services within the assessment area. During the evaluation period, the bank participated with community development organizations to provide 99 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 6 low- and moderate-income individuals and provided 59 financial education and foreclosure prevention workshops for 1,331 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 31 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, three employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA

**CRA rating for the Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA¹³:
Outstanding**

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Excellent distribution of loans by geography and good distribution by borrower income or business revenue size;
- Excellent level of CD lending;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and low- and moderate-income individuals.

Description of Institution's Operations in Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA

The Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA is Bank of America's ninth largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$30.3 billion or 2.5 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 76 depository financial institutions operating in the Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA, Bank of America, with a deposit market share of 13.7 percent, is the third largest. Financial institutions in the assessment area with deposit market shares greater than 5 percent include E*Trade Bank (15 percent), Wells Fargo Bank (14.4 percent), Capital One (11.6 percent), SunTrust Bank (8.4 percent), Branch Banking and Trust Company (6 percent), and PNC Bank (5.7 percent). As of December 31, 2016, the bank operated 155 full-service financial centers and 455 deposit-taking ATMs in the multistate MSA.

Refer to the community profile for the Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

¹³This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Scope of Evaluation in Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners discussed area community development needs with various local nonprofit organizations. The contacts identified affordable housing as the primary need in the assessment area.

During the evaluation period, Bank of America originated or purchased 41,176 home mortgage loans totaling \$13.1 billion, 59,722 small loans to businesses totaling \$1.7 billion, 195 small loans to farms totaling \$4 million, and 74 CD loans totaling \$741.8 million. Small loans to businesses accounted for approximately 59 percent of loan volume by number of loans while home mortgage loans accounted for approximately 41 percent. Therefore, examiners weighted small loans to businesses more than home mortgage loans and small loans to farms. Small loans to farms represented less than 1 percent of the loan volume and thus examiners weighted them very little in the overall Lending Test performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD MULTISTATE MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA is rated Outstanding, based on excellent lending activity, excellent geographic distribution, good borrower income distribution, and a relatively high level of CD lending that has a significantly positive effect on the Lending Test rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA is excellent.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 13.7 percent. The bank ranks third among 76 depository financial institutions in the multistate MSA, which places it in the top 4 percent of institutions. According to mortgage peer data for 2016, the bank has a market share of 1.8 percent based on the number of home mortgage loans originated or purchased. The bank ranks 12th among 820 home mortgage lenders in the multistate MSA, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has a market share of 9.5 percent based on the number of small loans to businesses originated or purchased. The bank ranks fourth out 219 small business lenders, which places it in the top 2 percent of lenders. According to peer farm data for 2016, the bank has a market share of 11.7 percent based on the number of small loans to farms originated or purchased. The bank ranks third among 33 farm lenders, which places it in

the top 10 percent of lenders. Lending activity is excellent considering the bank's higher ranking in home mortgage and small business lending relative to its deposit ranking.

LENDING VOLUME		Geography: MULTISTATE MSAs						Evaluation Period: January 1, 2012 to December 31, 2016				
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Allentown, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00
Augusta, GA/SC	100.00	2,346	313,412	2,676	75,905	52	411	0	0	5,076	389,728	100.00
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00
Portland, OR/WA	100.00	14,488	3,520,012	27,928	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
(****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is excellent. The bank's home mortgage lending is excellent in low-income census tracts and excellent in moderate-income census tracts.

The distribution of the bank's home mortgage loans in low-income geographies at 4.4 percent is higher than the 3.6 percent of owner-occupied housing units in low-income geographies and higher than the 3.8 percent for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 19.7 percent is slightly lower than the 19.9 percent of owner-occupied housing units in moderate-income geographies and it is higher than the 19 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Washington-Arlington-Alexandria DC-VA-MD MSA	14,818	5,161,445	100.0	273,171	3.6	4.4	3.8	19.9	19.1	19.0	40.3	36.1	38.5	36.3	40.4	38.7	0.0	0.0	0.0
Total	14,818	5,161,445	100.0	273,171	3.6	4.4	3.8	19.9	19.1	19.0	40.3	36.1	38.5	36.3	40.4	38.7	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent overall. The distribution is excellent in low-income geographies and excellent in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 4.5 percent is higher than the 4.3 percent of businesses operating in low-income geographies and it is higher than the 3.9 percent for aggregate lenders. The proportion of the bank’s small loans to businesses in moderate-income geographies at 20.4 percent is slightly higher than the 20.1 percent of businesses operating in moderate-income geographies and it is higher than the 19.5 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Washington-Arlington-Alexandria DC-VA-MD MSA	40,230	1,058,673	100.0	154,255	4.3	4.5	3.9	20.1	20.4	19.5	35.4	35.7	35.2	39.8	39.3	41.4	0.5	0.1	0.1
Total	40,230	1,058,673	100.0	154,255	4.3	4.5	3.9	20.1	20.4	19.5	35.4	35.7	35.2	39.8	39.3	41.4	0.5	0.1	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is adequate overall. The distribution is very poor in low-income geographies but considering very few farms are located in low-income geographies, which indicate fewer opportunities to lend, performance is poor. Due to the limited opportunities in low-income geographies, examiners placed more weight on performance in moderate-income geographies. The proportion of the bank’s small loans to farms in low-income geographies at 0 percent is lower than the 2.5 percent of farms in low-income geographies and it is lower than the 0.3 percent for aggregate lenders. The bank’s

proportion of small loans to farms in moderate-income geographies at 16.9 percent is lower than the 21.7 percent of farms in moderate-income geographies and it is lower than the 24.5 percent for aggregate lenders. Farm lending is not a primary loan product for the bank.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Washington-Arlington-Alexandria DC-VA-MD MSA	124	1,879	100.0	388	2.5	0.0	0.3	21.7	16.9	24.5	43.1	41.1	45.1	32.6	41.9	30.2	0.0	0.0	0.0
Total	124	1,879	100.0	388	2.5	0.0	0.3	21.7	16.9	24.5	43.1	41.1	45.1	32.6	41.9	30.2	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The bank’s distribution of home mortgage loans by borrower income is excellent overall. The distribution is good to low-income borrowers and excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income families at 12.1 percent is lower than the 21.1 percent of low-income families and higher than the 6.9 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income families at 20.1 percent is lower than the proportion of moderate-income families at 17.5 percent and it is higher than the 16 percent for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Washington-Arlington-Alexandria DC-VA-MD MSA	14,818	5,161,445	100.0	273,171	21.1	11.6	6.9	17.5	18.7	16.0	21.3	21.4	20.3	40.1	40.1	33.6	0.0	8.2	23.3
Total	14,818	5,161,445	100.0	273,171	21.1	11.6	6.9	17.5	18.7	16.0	21.3	21.4	20.3	40.1	40.1	33.6	0.0	8.2	23.3

*Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 28.9 percent of its small loans to businesses. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 60.8 percent is lower than the 78.2 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 49.5 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Washington-Arlington-Alexandria DC-VA-MD MSA	40,230	1,058,673	100.0	154,255	84.4	60.8	49.5	6.2	10.3	9.5	28.9
Total	40,230	1,058,673	100.0	154,255	84.4	60.8	49.5	6.2	10.3	9.5	28.9

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 35.5 percent of its small loans to farms. Approximately 58.9 percent of the bank’s small loans to farms with known revenues were to farms with revenues of \$1 million or less. The bank’s proportion is significantly lower than the 95 percent of farms with revenues of \$1 million or less, but is higher than the 33.2 percent for aggregate lenders

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Washington-Arlington-Alexandria DC-VA-MD MSA	124	1,879	100.0	388	94.4	58.9	33.2	3.3	9.0	2.2	35.5
Total	124	1,879	100.0	388	94.4	58.9	33.2	3.3	9.0	2.2	35.5

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a significantly positive effect on the bank's Lending Test performance in the Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA. During the evaluation period, the bank originated 74 CD loans totaling \$741.8 million or 19.5 percent of the allocated Tier 1 Capital. Approximately \$403 million (54 percent) supported the creation of nearly 3,000 units of affordable housing. The bank used approximately \$223 million (30 percent) to fund organizations providing community services targeted to low- and moderate-income individuals.

Examples of CD loans include:

- The bank provided \$12.2 million in financing to construct and renovate 520 North Market Street, an affordable housing project in Frederick, MD. The developer converted the former school building into 14 apartment units and constructed 45 new apartment units. The project has 53 units restricted to incomes at or below 50 percent of the area median income. The remaining six units are unrestricted market rate rentals. The bank also invested in LIHTCs supporting this housing project.
- The bank provided \$12 million in financing to acquire and renovate Taney Village Apartments in Frederick, MD, a 130-unit affordable housing project. The project has 117 units set aside for the elderly and 13 units for adults with disabilities. All units receive Section 8 assistance.
- The bank provided \$15.5 million in financing to construct a mixed-use building with 116 residential rental units with 5,200 square feet of retail space. All units are restricted to incomes at or below 60 percent of the area median income.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 80 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA is rated Outstanding.

The bank made 376 community development investments during the evaluation period totaling \$327.2 million. Approximately \$232.4 million or 71 percent of the current period investment dollars supported nearly 2,800 units of affordable housing. In addition, the bank has 106 community development investments totaling \$79.1 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$406.3 million or 10.7 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are generally innovative or complex with LIHTCs and New Markets Tax Credits representing approximately \$218.6 million or 66 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$15.4 million in a LIHTC to finance the construction of 520 North Market Street, an affordable housing project in Frederick, MD. The developer converted a former school building into 14 apartment units and constructed 45 new apartment units. The project includes 53 units restricted to incomes at or below 50 percent of the area median income. The remaining six units are unrestricted market rate rentals. The bank also provided the construction financing for this development.
- The bank purchased \$20.8 million in Multifamily Housing Tax Exempt Development Bonds to support the Housing Opportunities Commission's mission to provide affordable housing. The organization used the bond proceeds to finance mortgage loans in connection with the acquisition and rehabilitation of 1) Arcola Towers, a 141-unit multifamily public housing development in Silver Springs, MD and 2) Waverly House, a 158-unit multifamily public housing development in Bethesda, MD. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$12.6 million in three New Markets Tax Credit equity investments to fund the construction and renovation of the Achievement Preparatory Academy (APA) Wahler Campus in Washington DC. According to the DC Public Charter School Board 2016 Quality Report, which reports student demographics for the 2015-2016 school year, more than 60 percent of its 273 elementary school students were economically disadvantaged. More than 85 percent of its 383 middle school students were economically disadvantaged.

QUALIFIED INVESTMENTS		Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

The bank's performance under the Service Test in the Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA is rated Outstanding.

BANA's service delivery systems in the Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA are readily accessible to geographies and individuals of different income levels, based on a comparison of the bank's 155 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has 14 or 9 percent of its financial centers in low-income geographies and 41 or 26.5 percent of its financial centers in moderate-income geographies. According to the 2010 U.S. Census data, 8.1 percent of the population lives in low-income geographies and 24.3 percent lives in moderate-income geographies.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank's products and services. Alternative delivery systems have a positive effect on the retail banking services conclusion.

The bank has 19 financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to low- and moderate-income geographies. Of the 19 financial centers, two are adjacent to low-income geographies and 17 are adjacent to moderate-income

geographies. These adjacent financial centers help improve access of service delivery systems to low- and moderate-income geographies and individuals.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened seven financial center and closed twenty-six. The bank closed three financial centers in low-income geographies and twelve in moderate-income geographies. Despite these closures, service delivery systems remain readily accessible to low- and moderate-income geographies and individuals.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial center lobby hours are 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 12:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Washington-Arlington-Alexandria DC-VA-MD MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	121	9.0	454,454	8.1	14	9.0	50	11.0	1	14.3	3	11.5
Moderate	332	24.7	1,354,861	24.3	41	26.5	146	32.1	3	42.9	12	46.2
Middle	474	35.3	2,041,022	36.6	50	32.3	140	30.8	2	28.6	6	23.1
Upper	404	30.1	1,722,109	30.8	48	31.0	114	25.1	1	14.3	5	19.2
NA	12	0.9	10,288	0.2	2	1.3	5	1.1	0	0.0	0	0.0
Totals	1,343	100.0	5,582,734	100.0	155	100.0	455	100.0	7	100.0	26	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

The bank provides a relatively high level of community development services within the assessment area. During the evaluation period, the bank participated with community development organizations to provide 231 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 2 low- and moderate-income individuals and provided 131 financial education and foreclosure prevention workshops for 2,637 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 56 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 40 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Worcester, MA-CT Multistate MSA

CRA rating for the Worcester, MA-CT Multistate MSA¹⁴: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Good distribution of loans by geography and good distribution by borrower income or business revenue size;
- Excellent level of CD lending;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and low- and moderate-income individuals.

Description of Institution's Operations in Worcester, MA-CT MSA

The Worcester, MA-CT Multistate MSA is Bank of America's 33rd largest rating area based on its total deposits in the MSA. As of June 30, 2016, the bank maintained approximately \$2.4 billion or 0.2 percent of its total domestic deposits in financial centers in the multistate MSA. Of the 42 depository financial institutions operating in the Worcester, MA-CT Multistate MSA, Bank of America, with a deposit market share of 13.9 percent, is the largest. Financial institutions in the assessment area with market shares greater than 5 percent include Commerce Bank & Trust Company (9.8 percent), Unibank for Savings (8.8 percent), TD Bank (8.4 percent), and Santander Bank (7.5 percent). As of December 31, 2016, the bank operated 24 full-service financial centers and 86 deposit-taking ATMs in the multistate MSA.

Refer to the community profile for the Worcester, MA-CT Multistate MSA in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Worcester, MA-CT Multistate MSA

Examiners selected the entire multistate MSA for a full-scope review and based conclusions and ratings on activity within this multistate MSA. Examiners discussed area community

¹⁴This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

development needs with various local nonprofit organizations. The contacts identified affordable housing as the primary need in the assessment area.

During the evaluation period, Bank of America originated or purchased 1,345 home mortgage loans totaling \$291 million, 4,609 small loans to businesses totaling \$129.8 million, 45 small loans to farms totaling \$806,000, and 3 CD loans totaling \$52.2 million. Small loans to businesses accounted for approximately 77 percent of loan volume by number of loans while home mortgage loans accounted for approximately 22 percent. Therefore, examiners weighted small loans to businesses more than home mortgage loans and small loans to farms. Small loans to farms represented less than 1 percent of the loan volume and thus examiners weighted them very little in the overall Lending Test performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WORCESTER, MA-CT MULTISTATE MSA

LENDING TEST

Conclusions in Multistate MSA

Bank of America's performance under the Lending Test in the Worcester, MA-CT Multistate MSA is rated Outstanding, based on excellent lending activity, good geographic distribution, good borrower income distribution, and a relatively high level of CD lending that has a significantly positive effect on the Lending Test rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Worcester, MA-CT Multistate MSA is excellent.

According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 13.9 percent. The bank ranks first in deposits among 42 depository financial institutions in the multistate MSA, which places it in the top 3 percent of depository financial institutions. According to peer mortgage data for 2016, the bank has a market share of 1.5 percent based on the number of home mortgage loans originated or purchased. The bank ranks 12th among 496 home mortgage lenders in the multistate MSA, which places it in the top 3 percent of lenders. According to peer small business data for 2016, the bank has a market share of 10.4 percent based on the number of small loans to businesses originated or purchased. The bank ranks third among 119 small business lenders, which places it in the top 3 percent of lenders. According to peer farm data for 2016, the bank has a market share of 27.5 percent based on the number of small loans to farms originated or purchased. The bank ranks first among 11 farm lenders within the multistate MSA, which places it in the top 10 percent of lenders.

LENDING VOLUME		Geography: MULTISTATE MSAs						Evaluation Period: January 1, 2012 to December 31, 2016				
Rated Area	% of Total Loans (#) in Rated Area*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Total Deposits in Rated Area***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Allentown, PA/NJ	100.00	3,727	628,948	3,731	81,801	27	176	2	286	7,487	711,211	100.00
Augusta, GA/SC	100.00	2,346	313,412	2,678	75,905	52	411	0	0	5,076	389,728	100.00
Boston, MA/NH MMSA	100.00	26,379	9,106,001	57,911	2,120,563	182	2,486	65	492,677	84,537	11,721,727	100.00
Charlotte, NC/SC	100.00	23,169	4,962,369	21,090	610,053	97	1,526	24	109,056	44,380	5,683,004	100.00
Kansas City, MO/KS	100.00	12,085	1,804,370	12,439	302,499	145	2,300	11	22,061	24,680	2,131,230	100.00
Kingsport, TN/VA****	100.00	362	46,037	290	4,509	4	20	0	0	656	50,566	100.00
Myrtle Beach, SC/NC	100.00	3,522	593,955	2,310	51,124	11	83	2	5,627	5,845	650,789	100.00
New York, NY/NJ MMSA	100.00	56,030	23,192,160	169,069	6,563,633	458	4,712	205	1,031,390	225,762	30,791,895	100.00
Philadelphia, PA/NJ/DE MMSA	100.00	25,259	5,600,721	30,708	916,936	167	1,463	26	1,022,953	56,160	7,542,073	100.00
Portland, OR/WA	100.00	14,488	3,520,012	27,928	689,599	317	4,134	43	93,133	42,776	4,306,878	100.00
Providence, RI/MA	100.00	6,815	1,654,746	15,151	901,310	114	2,106	19	102,445	22,099	2,660,607	100.00
Salisbury, MD/DE	100.00	1,140	272,930	1,435	30,846	85	1,714	0	0	2,660	305,490	100.00
St. Louis, MO/IL	100.00	16,573	2,672,516	18,521	489,176	221	3,403	10	37,632	35,325	3,202,727	100.00
Washington, DC/VA/MD MMSA	100.00	41,176	13,064,389	59,722	1,726,381	195	4,022	74	741,842	101,167	15,536,634	100.00
Worcester, MA/CT	100.00	3,434	717,960	7,272	229,460	59	859	3	52,213	10,768	1,000,492	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.
(****) Bank of America sold/divested all financial centers in the Kingsport Multistate MSA during October 2014.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The geographic distribution of home mortgage loans is excellent. The bank’s home mortgage lending is excellent in low-income census tracts and good in moderate-income census tracts.

The distribution of the bank’s home mortgage loans in low-income geographies at 2 percent is higher than the 1.9 percent of owner-occupied housing units in low-income geographies and higher than the 1.7 percent for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 12.1 percent is lower than the 14.2 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 12.6 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Worcester MA-CT MSA	1,485	317,940	100.0	31,845	1.9	2.0	1.7	14.2	12.1	12.6	50.9	45.1	48.0	32.9	40.8	37.7	0.0	0.0	0.0
Total	1,485	317,940	100.0	31,845	1.9	2.0	1.7	14.2	12.1	12.6	50.9	45.1	48.0	32.9	40.8	37.7	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The geographic distribution of small loans to businesses is good overall. The distribution is good in low-income geographies and good in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 7.1 percent is lower than the 8 percent of businesses operating in low-income geographies and it is higher than the 6.8 percent for aggregate lenders. The proportion of the bank’s small loans to businesses in moderate-income geographies at 17.2 percent is lower than the 18.3 percent of businesses operating in moderate-income geographies and it is lower than the 17.7 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Worcester MA-CT MSA	4,609	129,805	100.0	15,396	8.0	7.1	6.8	18.3	17.2	17.7	42.1	37.9	41.5	31.6	37.8	34.0	0.0	0.1	0.0
Total	4,609	129,805	100.0	15,396	8.0	7.1	6.8	18.3	17.2	17.7	42.1	37.9	41.5	31.6	37.8	34.0	0.0	0.1	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is good overall. The distribution is poor in low-income geographies and excellent in moderate-income geographies. Considering very few farms are located in low-income geographies, which indicate fewer opportunities to lend, examiners placed more weight on performance in moderate-income geographies. The proportion of the bank’s small loans to farms in low-income geographies at 0 percent is lower than the 1.4 percent of farms in low-income geographies, but is consistent with the 0 percent for aggregate lenders. The bank’s proportion of small loans to farms in moderate-income geographies at 17.8 percent is higher than the 8.5 percent of farms in moderate-income geographies and it is higher than the 7.2 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS Worcester MA-CT MSA	45	806	100.0	69	1.4	0.0	0.0	8.5	17.8	7.2	54.0	60.0	55.1	36.1	22.2	37.7	0.0	0.0	0.0
Total	45	806	100.0	69	1.4	0.0	0.0	8.5	17.8	7.2	54.0	60.0	55.1	36.1	22.2	37.7	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The bank’s distribution of home mortgage loans by borrower income is good overall. The distribution is adequate to low-income borrowers and excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income families at 8.4 percent is lower than the 21 percent of low-income families and higher than the 5.5 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income families at 19.5 percent is higher than the proportion of moderate-income families at 16.8 percent and it is higher than the 16.6 percent for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate
FS Worcester MA-CT MSA	1,485	317,940	100.0	31,845	21.0	8.4	5.5	16.8	19.5	16.6	22.3	23.5	22.4	39.9	40.6	38.9	0.0	8.0	16.6
Total	1,485	317,940	100.0	31,845	21.0	8.4	5.5	16.8	19.5	16.6	22.3	23.5	22.4	39.9	40.6	38.9	0.0	8.0	16.6

Source: 2010 U.S Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank's originations/purchases of small loans to businesses.

The bank's distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 37.8 percent of its small loans to businesses. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 51.9 percent is lower than the 77.1 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 44.3 percent for aggregate lenders, overall performance is good.

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
FS Worcester MA-CT MSA	4,609	129,805	100.0	15,396	77.1	51.9	44.3	5.6	10.3	17.3	37.8
Total	4,609	129,805	100.0	15,396	77.1	51.9	44.3	5.6	10.3	17.3	37.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank's originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 33.3 percent of its small loans to farms. Approximately 53.3 percent of the bank's small loans to farms with known revenues were to farms with revenues of \$1 million or less. The bank's proportion is significantly lower than the 96.8 percent of farms with revenues of \$1 million or less, but is higher than the 44.9 percent for aggregate lenders

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Worcester MA-CT MSA	45	806	100.0	69	96.8	53.3	44.9	1.9	18.8	1.3	33.3
Total	45	806	100.0	69	96.8	53.3	44.9	1.9	18.8	1.3	33.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a significantly positive effect on the bank's Lending Test performance in the Worcester, MA-CT Multistate MSA. During the evaluation period, the bank originated three CD loan totaling \$52.3 million or 17.2 percent of the allocated Tier 1 Capital to fund affordable housing projects and to revitalize or stabilize low- or moderate-income geographies.

Examples of CD loans include:

- The bank provided \$27 million for the renovation of the former Fitchburg Yarn Factory into the Fitchburg Yarn Lofts, a 96-unit mixed income multifamily housing development in Fitchburg, MA. The project, located in a moderate-income census tract, will have 39 units restricted to incomes at or below 60 percent of the area median income. The remaining 57 units are market rate rentals. The project helps to revitalize and stabilize the moderate-income geography. The bank also invested in LIHTCs supporting this project.
- The bank provided \$23.3 million in construction financing for the historic preservation and adaptive reuse of the former Worcester Vocational Technical School located in a moderate-income census tract in Worcester. The area was once home to old mill buildings but has been undergoing transition into land of entrepreneurship and residency. The project will result in 84 mixed income rental units comprising 42 affordable housing units and 42 market rate units.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the multistate MSA, lending under the MHA and HARP programs accounted for 87 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions in Multistate MSA

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the Worcester, MA-CT Multistate MSA is rated Outstanding.

The bank made 50 community development investments during the evaluation period totaling \$50 million. Approximately \$27.8 million or 56 percent of the current period investment dollars support revitalization and stabilization efforts and \$21.5 million or 43 percent support more than 600 units of affordable housing. In addition, the bank has 33 community development investments totaling \$8.1 million it made during a prior evaluation period that are still outstanding and continuing to provide benefit to the community. Outstanding prior period and current period investments total \$58 million or 19.1 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are generally innovative or complex with LIHTCs representing approximately \$45.9 million or 92 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$731,000 in a LIHTC equity investment to fund the rehabilitation of 20 units of affordable housing in Worcester, MA. All units are restricted to renters with incomes at or below 60 percent of the area median income.
- The bank purchased \$15.8 million in a LIHTC for the renovation of Fitchburg Yarn Mill into a 96-unit mixed-income market rate and affordable housing project. The project will include 39 units restricted to incomes at or below 60 percent of the area median income and 57 market rate units. Bank of America also provided the construction financing for the project.
- The bank invested \$1.3 million in a LIHTC that funded the acquisition and rehabilitation of historically significant former Sitkowski School building in Webster, MA into 66 affordable housing units for seniors. All units are restricted to incomes at or below 60 percent of the area median income.

Table 14. Qualified Investments								2012-2016	
QUALIFIED INVESTMENTS		Geography: MULTISTATE MSAs				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
Rated Area	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total \$'s	#	\$(000's)
Allentown, PA-NJ	29	2,182	62	21,597	91	23,779	0.15	0	0
Augusta, GA-SC	26	1,569	71	9,870	97	11,439	0.07	0	0
Boston, MA-NH	205	150,389	727	620,276	932	770,665	4.77	33	137,802
Charlotte, NC-SC	300	90,373	674	576,581	974	666,954	4.12	8	58,990
Kansas City, MO-KS	75	17,236	98	52,393	173	69,629	0.43	4	39,442
Myrtle Beach, SC-NC	12	892	56	6,662	68	7,554	0.05	0	0
New York, NY-NJ	360	290,675	908	1,289,227	1,268	1,579,902	9.77	45	308,425
Philadelphia, PA-NJ-DE	293	65,392	640	236,373	933	301,765	1.87	4	6,573
Portland, OR-WA	40	21,727	145	102,461	185	124,188	0.77	7	12,660
Providence, RI-MA	47	22,282	200	124,687	247	146,969	0.91	5	51,585
Salisbury, MD-DE	76	4,855	101	18,764	177	23,619	0.15	0	0
St. Louis, MO-IL	136	35,310	164	108,272	300	143,582	0.89	7	19,614
Washington, DC-VA-MD	106	79,115	376	327,228	482	406,343	2.51	13	104,251
Worcester, MA-CT	33	8,080	50	49,949	83	58,029	0.36	1	14,269

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions in Multistate MSA

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

The bank's performance under the Service Test in the Worcester, MA-CT Multistate MSA is rated Outstanding.

BANA's service delivery systems in the Worcester, MA-CT Multistate MSA are readily accessible to geographies and individuals of different income levels, based on a comparison of the bank's 24 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has three or 12.5 percent of its financial centers in low-income geographies and seven or 29.2 percent of its financial centers in moderate-income geographies. According to the 2010 U.S. Census data, 6.8 percent of the population lives in low-income geographies and 18.9 percent lives in moderate-income geographies.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank's products and services. Alternative delivery systems have a positive effect on the retail banking services conclusion.

The bank has three financial centers in middle-income geographies that are adjacent to or are in very close proximity to moderate-income geographies. These adjacent financial centers help

improve access of service delivery systems to moderate-income geographies and to low- and moderate-individuals.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center in a low-income geography and closed four. The bank closed two financial centers in low-income geographies and two in middle-income geographies. Despite these closures, service delivery systems remain readily accessible to low- and moderate-income geographies and individuals.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial center lobby hours are generally 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 5:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Worcester MA-CT MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	16	8.1	62,381	6.8	3	12.5	12	14.0	1	100.0	2	50.0
Moderate	43	21.8	173,373	18.9	7	29.2	26	30.2	0	0.0	0	0.0
Middle	88	44.7	414,745	45.2	8	33.3	28	32.6	0	0.0	2	50.0
Upper	48	24.4	262,911	28.7	6	25.0	19	22.1	0	0.0	0	0.0
NA	2	1.0	3,570	0.4	0	0.0	1	1.2	0	0.0	0	0.0
Totals	197	100.0	916,980	100.0	24	100.0	86	100.0	1	100.0	4	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

The bank provides a relatively high level of community development services within the assessment area. During the evaluation period, the bank participated with community development organizations to provide 90 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 5 low- and moderate-income individuals and provided 31 financial education and foreclosure prevention workshops for 806 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 20 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 13 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

State Ratings

State of Arizona

CRA Rating for Arizona¹⁵:	Satisfactory
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Reasonably accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Arizona

The state of Arizona is Bank of America's 45th largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$20.7 billion or 1.7 percent of its total domestic deposits in financial centers within the state of Arizona. Of the 65 depository financial institutions operating in the state, Bank of America, with a deposit market share of 18.1 percent, is the third largest. The only two other major banks that have deposit market shares greater than 5 percent include JPMorgan Chase Bank (26.3 percent) and Wells Fargo Bank (25.3 percent). As of December 31, 2016, the bank operated 141 financial centers and 491 ATMs in the state of Arizona.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Phoenix-Mesa-Scottsdale, AZ MSA, Bank of America reported an additional \$437 million in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

¹⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the community profiles for the state of Arizona in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Arizona

Examiners selected two assessment areas for full-scope reviews and the remaining five assessment areas for limited-scope reviews. The full-scope assessment areas included the Lake Havasu City-Kingman, AZ MSA and Phoenix-Mesa-Scottsdale, AZ MSA. While the Phoenix-Mesa-Scottsdale, AZ MSA carries approximately 82 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in Arizona, examiners based the conclusions and ratings for the state on the activities within all assessment areas.

During the evaluation period, Bank of America originated or purchased 42,544 home mortgage loans totaling \$8.3 billion, 49,006 small loans to businesses totaling \$1.5 billion, 304 small loans to farms totaling \$6.3 million, and 38 CD loans totaling \$118.4 million in the state of Arizona. Lending volumes include loans originated or purchased in the Yuma, AZ MSA, which is no longer designated as an assessment area due to the bank's closure or sale of all financial centers and deposit-taking ATMs in the community. Based on loan volume, examiners weighted small loans to businesses, representing 53 percent of the volume, the most followed by home mortgage loans (46 percent), and small loans to farms (0.3 percent).

Examiners met with a variety of community development organizations, nonprofit organizations, and local and regional government agencies to learn about current economic trends and community development challenges and needs of low- and moderate-income people and neighborhoods. The community contacts identified several community development needs, including but not limited to mortgages for low- and moderate-income individuals, affordable housing, housing for the growing ageing population, and access to banks in rural communities.

The bank originated or purchased too few small loans to farms in the following assessment areas for any meaningful analysis: Lake Havasu City-Kingman, AZ MSA, Flagstaff MSA, Prescott MSA, and Sierra Vista-Douglas MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Arizona is rated High Satisfactory, based on excellent lending activity, good geographic distribution, and good borrower income distribution. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Arizona is excellent. Lending activity is excellent in the Lake Havasu City-Kingman, AZ MSA and excellent in the Phoenix-Mesa-Scottsdale, AZ MSA.

Lake Havasu City-Kingman, AZ MSA

Lending activity in the Lake Havasu City-Kingman, AZ MSA is excellent. According to FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 11.5 percent. The bank ranks third among 11 depository financial institutions, which places it in the top 28 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.8 percent based on the number of home mortgage loans originated or purchased. The bank ranks 15th among 328 home mortgage lenders in the assessment area, which places it in the top 5 percent of lenders. Based on peer small business data for 2016, the bank has a 4.6 percent market share based on the number of small loans to businesses originated or purchased. The bank ranks eighth among 52 small business lenders in the assessment area, which places it in the top 16 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

Phoenix-Mesa-Scottsdale, AZ MSA

Lending activity in the Phoenix-Mesa-Scottsdale, AZ MSA is excellent. Based on the FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 19.8 percent. After adjusting for \$437 million in corporate deposits, the bank ranks third among 57 depository financial institutions in the assessment area, which places it in the top 6 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.6 percent based on the number of home mortgage loans originated or purchased. The bank ranks 14th among 852 home mortgage lenders, which places it in the top 2 percent of lenders. Based on peer small business data for 2016, the bank has a 6.7 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fifth among 203 small business lenders in the assessment area, which places it in the top 3 percent of lenders. For small loans to farms, the bank has a market share of 6.5 percent based on the number of small loans to farms originated or purchased. The bank ranks fifth among 33 farm lenders, which places it in the top 16 percent of lenders. Considering the higher ranking for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: ARIZONA						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Lake Havasu City, AZ	2.75	1,537	210,374	980	24,745	13	1,049	1	1,053	2,531	237,221	1.48
Phoenix, AZ	73.52	30,114	6,185,303	37,259	1,193,167	160	2,930	30	93,363	67,563	7,474,763	82.38
Limited Review												
Flagstaff, AZ	2.09	851	183,039	1,063	24,399	5	35	0	0	1,919	207,473	0.81
Prescott, AZ	3.68	1,677	311,434	1,687	45,347	14	109	0	0	3,378	356,890	2.23
Sierra Vista, AZ	0.66	222	29,766	366	6,237	19	1,156	0	0	607	37,159	0.69
Tucson, AZ	14.24	6,519	1,113,776	6,517	170,468	45	520	5	16,045	13,086	1,300,809	12.41
Yuma, AZ	0.81	467	66,758	258	6,117	15	162	1	6,543	741	79,580	0.00
Arizona Non-MSA	2.25	1,157	169,718	876	27,824	33	330	1	1,388	2,067	199,260	0.00
ARIZONA	100.00	42,544	8,270,168	49,006	1,498,304	304	6,291	38	118,391	91,892	9,893,154	100.00
(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.												
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.												
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.												

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is adequate. The distribution is poor in the Lake Havasu City-Kingman, AZ MSA and adequate in the Phoenix-Mesa-Scottsdale, AZ MSA.

Lake Havasu City-Kingman, AZ MSA

The geographic distribution of home mortgage loans in the Lake Havasu City-Kingman, AZ MSA is poor. There are no low-income census tracts in the MSA. Performance is poor in moderate-income geographies. The distribution in moderate-income geographies at 2.8 percent is significantly lower than the 10.1 percent of owner-occupied housing units in moderate-income geographies and lower than the 3.5 percent for aggregate lenders.

Phoenix-Mesa-Scottsdale, AZ MSA

The geographic distribution of home mortgage loans in the Phoenix-Mesa-Scottsdale, AZ MSA is adequate. Performance is adequate in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 1.6 percent is lower than the 3.7 percent of owner-occupied housing units in low-income

geographies and it is slightly lower than the 1.7 percent performance for aggregate lenders. The distribution in moderate-income geographies at 13.4 percent is lower than the 21.5 percent of owner-occupied housing units in moderate-income geographies and it is similar to the 13.9 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Lake Havasu City-Kingman AZ MSA	508	67,680	3.4	8,079	0.0	0.0	0.0	10.1	2.8	3.5	83.1	87.8	89.9	6.9	9.4	6.7	0.0	0.0	0.0
FS Phoenix-Mesa-Scottsdale AZ MSA	11,064	2,432,584	73.5	235,493	3.7	1.6	1.7	21.5	13.4	13.9	38.1	36.9	40.6	36.8	48.0	43.4	0.0	0.1	0.4
LS Arizona Non-MSA	34	4,426	0.2	463	12.7	0.0	0.0	41.9	0.0	3.7	35.4	85.3	71.7	10.0	14.7	24.6	0.0	0.0	0.0
LS Flagstaff AZ MSA	306	69,039	2.0	5,014	0.0	0.0	0.0	18.0	4.6	4.4	48.4	51.0	55.6	33.6	44.4	40.0	0.0	0.0	0.0
LS Prescott AZ MSA	687	142,475	4.6	10,654	0.0	0.0	0.0	11.6	9.0	11.8	68.2	66.2	70.3	20.2	24.7	17.9	0.0	0.0	0.0
LS Sierra Vista-Douglas AZ MSA	222	29,766	1.5	3,813	0.0	0.0	0.0	29.4	24.8	21.8	47.1	53.6	48.4	23.5	21.6	29.7	0.0	0.0	0.0
LS Tucson AZ MSA	2,225	381,588	14.8	42,948	3.5	2.4	1.7	22.0	15.8	14.2	37.4	35.3	36.2	37.2	46.5	47.9	0.0	0.0	0.0
Total	15,046	3,127,558	100.0	306,464	3.3	1.5	1.5	21.0	13.1	13.5	41.4	40.4	42.7	34.3	44.9	41.9	0.0	0.1	0.3

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is good in the Lake Havasu City-Kingman, AZ MSA and excellent in the Phoenix-Mesa-Scottsdale, AZ MSA.

Lake Havasu City-Kingman, AZ MSA

The geographic distribution of small loans to businesses in the Lake Havasu City-Kingman, AZ MSA is excellent. Since there are no low-income census tracts, examiners based the conclusion on performance in moderate-income geographies. Performance is excellent in moderate-income geographies. The distribution in moderate-income geographies at 4.8 percent is slightly below the 5.4 percent of businesses in moderate-income geographies and it exceeds the 4.6 percent performance for aggregate lenders.

Phoenix-Mesa-Scottsdale, AZ MSA

The geographic distribution of small loans to businesses in the Phoenix-Mesa-Scottsdale, AZ MSA is excellent. The distribution is excellent in low-income geographies and excellent in moderate-income geographies. The geographic distribution in low-income geographies at 6.5 percent is similar to the 6.4 percent of businesses in low-income geographies and it is slightly

higher than the 6.3 percent performance for aggregate lenders. The geographic distribution in moderate-income geographies at 14.6 percent is slightly lower than the 15.9 percent of businesses in moderate-income geographies and it is slightly higher than the 14.5 percent performance of aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Lake Havasu City-Kingman AZ MSA	540	14,391	1.8	3,914	0.0	0.0	0.0	5.4	4.8	4.6	87.5	89.4	87.8	7.1	5.7	7.6	0.0	0.0	0.0
FS Phoenix-Mesa-Scottsdale AZ MSA	23,201	680,429	77.9	124,716	6.4	6.5	6.3	15.9	14.6	14.5	30.9	28.1	28.4	46.2	50.5	50.3	0.5	0.3	0.4
LS Flagstaff AZ MSA	600	13,806	2.0	2,914	0.0	0.0	0.0	15.3	15.0	14.1	44.8	36.5	42.8	39.9	48.5	43.1	0.0	0.0	0.0
LS Prescott AZ MSA	991	29,639	3.3	7,955	0.0	0.0	0.0	17.3	16.7	14.4	56.7	51.3	58.4	26.0	32.1	27.2	0.0	0.0	0.0
LS Arizona Non-MSA	27	456	0.1	222	3.8	16.7	1.4	21.0	14.3	16.7	59.6	66.7	57.2	15.6	18.5	24.8	0.0	0.0	0.0
LS Sierra Vista-Douglas AZ MSA	366	6,237	1.2	1,946	0.0	0.0	0.0	32.2	35.2	26.4	49.4	48.9	52.4	18.4	15.8	21.2	0.0	0.0	0.0
LS Tucson AZ MSA	4,045	98,484	13.6	23,108	5.8	5.3	4.7	25.2	25.1	22.8	30.1	30.4	30.4	38.9	39.2	42.1	0.0	0.0	0.0
Total	29,770	843,442	100.0	164,775	5.7	5.8	5.4	17.2	16.2	15.6	34.1	30.8	32.1	42.6	47.1	46.5	0.4	0.2	0.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is adequate, driven by performance in the Phoenix-Mesa-Scottsdale, AZ MSA.

Lake Havasu City-Kingman, AZ MSA

The bank made too few small loans to farms in the Lake Havasu City-Kingman, AZ MSA to perform any meaningful analysis.

Phoenix-Mesa-Scottsdale, AZ MSA

The geographic distribution of small loans to farms in the Phoenix-Mesa-Scottsdale, AZ MSA is adequate, based on poor performance in low-income geographies and good performance in moderate-income geographies. The geographic distribution of small loans to farms in low-income geographies at 3.6 percent is lower than the 5.6 percent of farms in low-income geographies and it is lower than the 5.2 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 13.3 percent is lower than the 17.2 percent of farms in moderate-income geographies and it is lower than the 17.5 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms			Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Lake Havasu City-Kingman AZ MSA	9	1,019	7.3	19	0.0	0.0	0.0	5.7	0.0	0.0	89.2	77.8	84.2	5.1	25.0	15.8	0.0	0.0	0.0
FS Phoenix-Mesa-Scottsdale AZ MSA	90	1,809	59.6	382	5.6	3.6	5.2	17.2	13.3	17.5	34.5	32.2	41.6	42.3	52.2	35.1	0.4	0.0	0.5
LS Flagstaff AZ MSA	1	15	1.9	14	0.0	0.0	0.0	12.5	0.0	14.3	54.4	100.0	57.1	33.0	0.0	28.6	0.0	0.0	0.0
LS Prescott AZ MSA	5	44	9.3	42	0.0	0.0	0.0	10.7	0.0	7.1	64.9	100.0	64.3	24.5	100.0	28.6	0.0	0.0	0.0
LS Arizona Non-MSA	1	8	2.4	14	1.8	0.0	0.0	5.5	0.0	0.0	80.4	100.0	92.9	12.3	100.0	7.1	0.0	0.0	0.0
LS Sierra Vista-Douglas AZ MSA	19	1,156	12.6	54	0.0	0.0	0.0	29.6	52.6	42.6	49.2	47.4	44.4	21.1	0.0	13.0	0.0	0.0	0.0
LS Tucson AZ MSA	23	355	15.8	62	4.4	0.0	0.0	22.2	13.3	22.6	36.6	56.5	37.1	36.8	34.8	40.3	0.0	0.0	0.0
Total	151	4,426	100.0	587	4.6	2.1	3.4	17.6	15.9	18.6	39.3	43.0	46.0	38.2	39.7	31.7	0.3	0.0	0.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Lake Havasu City-Kingman, AZ MSA and it is good in the Phoenix-Mesa-Scottsdale, AZ MSA.

Lake Havasu City-Kingman, AZ MSA

The distribution of home mortgage loans by borrower income in the Lake Havasu City-Kingman, AZ MSA is good. The distribution is adequate to low-income borrowers and it is good to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 7.7 percent is lower than the 18.4 percent of low-income families in the

MSA; however, the bank’s performance is higher than the 4.9 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 13.2 percent is lower than the 19.3 percent of moderate-income families and it exceeds the 12.8 percent performance for aggregate lenders.

Phoenix-Mesa-Scottsdale, AZ MSA

The distribution of home mortgage loans by borrower income in the Phoenix-Mesa-Scottsdale, AZ MSA is good. The distribution is adequate to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 9.1 percent is lower than the 21.2 percent of low-income families in the MSA; however, it is significantly higher than the 4.2 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 16.8 percent is slightly lower the 17.8 percent of moderate-income families in the MSA and it exceeds the 13.7 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate
FS Lake Havasu City-Kingman AZ MSA	508	67,680	3.4	8,079	18.4	7.7	4.9	19.3	13.2	12.8	23.4	18.1	17.9	38.9	53.9	43.3	0.0	7.1	21.1
FS Phoenix-Mesa-Scottsdale AZ MSA	11,064	2,432,584	73.5	235,493	21.2	9.1	4.2	17.8	16.8	13.7	20.5	18.9	19.1	40.6	45.1	39.6	0.0	10.2	23.4
LS Arizona Non-MSA	34	4,426	0.7	463	30.7	5.9	1.5	16.6	2.9	9.3	16.5	17.6	17.1	36.2	64.7	54.6	0.0	8.8	17.5
LS Flagstaff AZ MSA	306	69,039	2.0	5,014	21.2	4.9	1.6	17.8	9.8	10.1	20.0	14.7	17.4	41.0	65.4	55.4	0.0	5.2	15.5
LS Prescott AZ MSA	687	142,475	4.6	10,654	18.5	9.9	3.4	20.3	15.6	11.5	20.9	19.7	20.1	40.3	48.6	45.3	0.0	6.3	19.6
LS Sierra Vista-Douglas AZ MSA	222	29,766	1.5	3,813	20.7	16.2	6.9	17.9	15.3	12.3	20.0	15.8	15.3	41.4	33.3	29.6	0.0	19.4	35.9
LS Tucson AZ MSA	2,225	381,588	14.8	42,948	21.6	11.5	4.4	17.8	17.4	12.6	19.6	19.5	17.7	40.9	41.8	38.9	0.0	9.8	26.3
Total	15,046	3,127,558	100.0	306,464	21.1	9.4	4.2	17.9	16.5	13.4	20.4	18.9	18.9	40.6	45.3	40.0	0.0	9.9	23.6

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Lake Havasu City-Kingman, AZ MSA and it is good in the Phoenix-Mesa-Scottsdale, AZ MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 32 percent of its small loans to businesses.

Lake Havasu City-Kingman, AZ MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Lake Havasu City-Kingman, AZ MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 49.4 percent is lower than the 80.8 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 45 percent for aggregate lenders, overall performance is good.

Phoenix-Mesa-Scottsdale, AZ MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Phoenix-Mesa-Scottsdale, AZ MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 58 percent is lower than the 80 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 41.6 percent for aggregate lenders, overall performance is good.

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
FS Lake Havasu City-Kingman AZ MSA	540	14,391	1.8	3,914	80.8	49.4	45.0	3.7	9.1	15.5	41.5
FS Phoenix-Mesa-Scottsdale AZ MSA	23,201	680,429	77.9	124,716	80.0	58.0	41.6	3.9	10.6	16.2	31.3
LS Flagstaff AZ MSA	600	13,806	2.0	2,914	76.9	50.8	44.3	4.3	12.2	18.8	37.0
LS Prescott AZ MSA	991	29,639	3.3	7,955	82.5	51.4	40.3	3.0	9.3	14.5	39.4
LS Arizona Non-MSA	27	456	0.1	222	60.0	48.1	45.0	6.6	27.3	33.4	40.7
LS Sierra Vista-Douglas AZ MSA	366	6,237	1.3	1,946	77.5	56.0	42.6	3.2	9.0	19.2	35.0
LS Tucson AZ MSA	4,045	98,484	13.6	23,108	79.4	57.3	40.0	4.1	9.2	16.5	33.4
Total	29,770	843,442	100.0	164,775	79.8	57.4	41.4	3.9	10.4	16.3	32.2

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data: 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate, driven by performance in the Phoenix-Mesa-Scottsdale, AZ MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 32 percent of its small loans to farms.

Lake Havasu City-Kingman, AZ MSA

The bank made too few small loans to farms in the Lake Havasu City-Kingman, AZ MSA to perform any meaningful analysis.

Phoenix-Mesa-Scottsdale, AZ MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Phoenix-Mesa-Scottsdale, AZ MSA is adequate. Based on farms with known revenues, the proportion of the bank's small loans to farms at 54.4 percent is lower than the 94 percent of farms with gross annual revenues of \$1 million or less. Considering the bank's distribution exceeded the 38.2 percent for aggregate lenders, performance is adequate.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Lake Havasu City-Kingman AZ MSA	8	982	7.3	19	97.4	50.0	26.3	1.3	50.0	1.3	37.5
FS Phoenix-Mesa-Scottsdale AZ MSA	90	1,809	59.6	382	94.0	54.4	38.2	4.2	13.3	1.7	32.2
LS Flagstaff AZ MSA	1	15	1.9	14	93.5	0.0	42.9	3.1	0.0	3.4	100.0
LS Prescott AZ MSA	7	58	6.4	42	97.5	57.1	38.1	1.0	0.0	1.6	42.9
LS Arizona Non-MSA	2	14	2.4	14	98.8	100.0	78.6	1.2	0.0	0.0	100.0
LS Sierra Vista-Douglas AZ MSA	19	1,156	12.6	54	97.0	52.6	37.0	1.4	16.7	1.6	36.8
LS Tucson AZ MSA	23	355	15.2	62	96.1	65.2	50.0	2.6	17.4	1.3	17.4
Total	151	4,426	100.0	587	94.8	55.0	40.0	3.6	13.2	1.7	31.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

Community development lending has a neutral effect overall on the bank's Lending Test performance in the state of Arizona. The bank met the community's credit needs primarily through retail lending.

Lake Havasu City-Kingman, AZ MSA

In the Lake Havasu City-Kingman, AZ MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated one CD loan totaling \$1.1 million that helped promote economic development through the financing of a small business. CD lending represents 2.7 percent of the allocated Tier 1 Capital.

Phoenix-Mesa-Scottsdale, AZ MSA

In the Phoenix-Mesa-Scottsdale, AZ MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated 30 CD loans totaling \$93.4 million that mostly helped provide 755 units of affordable housing. CD lending represents 4.5 percent of the allocated Tier 1 Capital, after considering \$437 million in deposits from national corporations in which the deposits did not derive from the local community.

Examples of CD loans include:

- The bank provided \$6.3 million in construction financing for Aurora Village Apartments, a 65-unit affordable multifamily housing project in Youngtown, AZ for seniors aged 62 or older. All units are restricted incomes at or below 60 percent of the area median income. The bank also provided a LIHTC equity investment for the project.
- The bank provided \$7.5 million in construction and permanent financing for Escobedo at Verde Vista Phase II, a 62-unit affordable multifamily housing project in Mesa, AZ. The developers set aside 30 units for permanent supportive housing for chronically homeless individuals and families supported by a Project-Based Section 8 contract. All remaining units are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$8.8 million in construction financing for Escobedo at Verde Vista Phase I, a 70-unit LIHTC affordable housing development in Mesa, AZ. This phase includes 12 new buildings with income restricted at or below 60 percent of the area median income.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Arizona, lending under the MHA and HARP programs accounted for 84 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Flagstaff, AZ MSA, Prescott, AZ MSA, Sierra Vista-Douglas, AZ MSA, Tucson, AZ MSA, and Arizona Non-MSA is consistent with the High Satisfactory Lending Test performance in the state of Arizona.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Arizona is rated Outstanding. Investment performance is adequate in the Lake Havasu City-Kingman, AZ MSA and excellent in the Phoenix-Mesa-Scottsdale, AZ MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lake Havasu City-Kingman, AZ MSA

In the Lake Havasu City-Kingman, AZ MSA, Bank of America has an adequate level of community development investments. The bank made 16 CD investments during the evaluation period totaling \$1.3 million. Approximately \$1.3 million or 98 percent of the current period investment dollars supported 109 units of affordable housing. In addition, the bank has eight CD investments totaling \$530,000 it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$1.9 million or 4.9 percent of allocated Tier 1 Capital. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$1 million or 73 percent of the investment dollars.

Phoenix-Mesa-Scottsdale, AZ MSA

In the Phoenix-Mesa-Scottsdale, AZ MSA, the bank has an excellent level of CD investments. The bank made 281 CD investments during the evaluation period totaling \$197.5 million. Approximately \$183.2 million or 93 percent of the current period investment dollars supported nearly 1,700 units of affordable housing. In addition, the bank has 154 CD investments totaling \$31.8 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$229.4 million or 11 percent of allocated Tier 1 Capital, after considering the \$437 million in deposits that did not originate from the assessment area. The majority of current period investments are generally neither innovative nor complex with mortgage-backed securities representing approximately \$102 million or 52 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$10 million in LIHTCs to fund the construction of Aurora Village Apartments, a 65-unit affordable multifamily housing project in Youngtown, AZ for seniors aged 62 or older. All units are restricted to incomes at or below 60 percent of the area median income. The bank also provided the construction financing for the project.
- The bank invested \$12 million in a LIHTC to fund the construction of Meridian at 101, a 76-unit affordable housing development in Tempe, AZ for seniors aged 55 and older. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$13.8 million in a LIHTC to fund the gut rehabilitation and reconfiguration of Norwood Village Apartments in Glendale, AZ, an existing 115-unit into a 95-unit affordable housing development. All units will be restricted to incomes at or below 60 percent of the area median income.

QUALIFIED INVESTMENTS		Geography: ARIZONA				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Lake Havasu City, AZ	8	530	16	1,344	24	1,874	0.68	0	0	
Phoenix, AZ	154	31,854	281	197,526	435	229,380	83.02	7	18,652	
Limited Review										
Flagstaff, AZ	5	537	9	507	14	1,044	0.38	0	0	
Prescott, AZ	8	2,206	26	2,374	34	4,580	1.66	0	0	
Sierra Vista, AZ	1	58	9	667	10	725	0.26	0	0	
Tucson, AZ	20	5,222	71	24,404	91	29,626	10.72	2	11,561	
Arizona Non-MSA	0	0	4	82	4	82	0.03	0	0	
ARIZONA - Statewide	0	0	25	511	25	511	0.19	0	0	
ARIZONA - Non Assessed	18	5,581	28	2,887	46	8,468	3.06	0	0	
ARIZONA	214	45,988	469	230,303	683	276,291	100.00	9	30,213	
(*) '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 bank's financial reporting system.										

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Arizona Non-MSA is consistent with the Outstanding Investment Test performance in the state of Arizona. Performance in the Flagstaff, AZ MSA, Prescott, AZ MSA, Sierra Vista-Douglas, AZ MSA, and Tucson, AZ MSA is weaker than the overall Outstanding Investment Test performance in the state of Arizona. Performance is weaker primarily due to lower levels of CD investments relative to the bank's size and resources in those assessment areas.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Arizona is rated Low Satisfactory. Service Test performance is excellent in the Lake Havasu City-Kingman, AZ MSA and adequate in the Phoenix-Mesa-Scottsdale, AZ MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Lake Havasu City-Kingman, AZ MSA

In the Lake Havasu City-Kingman, AZ MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's three financial centers with the distribution of the population. Because the Lake Havasu City-Kingman, AZ MSA has no low-

income census tracts, examiners based the conclusion on performance in moderate-income geographies. The bank has one of its three financial centers, representing 33.3 percent of the financial center located in moderate-income geographies where 11.3 percent of the population lives.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. We compared the usage of ADS by customers in moderate-income geographies with the percentage of the population residing in moderate-income geographies. In almost every ADS delivery channel, the percentage of customers in moderate-income geographies using those products exceeded the percentage of individuals in moderate-income geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in moderate-income geographies and to low- and moderate-income individuals. The bank closed one financial center in a middle-income geography during the evaluation period. Despite the closure, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are generally consistent throughout the assessment area. Financial centers are open 9:00 am to 5:00 pm Monday, 10:00 am to 5:00 pm Tuesday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Lake Havasu City-Kingman AZ MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	6	14.0	22,541	11.3	1	33.3	3	27.3	0	0.0	0	0.0
Middle	34	79.1	166,103	83.0	2	66.7	7	63.6	0	0.0	1	100.0
Upper	3	7.0	11,542	5.8	0	0.0	1	9.1	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	43	100.0	200,186	100.0	3	100.0	11	100.0	0	100.0	1	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Phoenix-Mesa-Scottsdale, AZ MSA

In the Phoenix-Mesa-Scottsdale, AZ MSA, the bank’s service delivery systems are reasonably accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 106 financial centers with the distribution of the population. The bank has three financial centers or 2.8 percent of its financial centers in low-income geographies where 8.2 percent of the population lives. The bank has 22 financial centers or 20.8 percent of its financial centers located in moderate-income geographies where 24.7 percent of the population lives.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The proportions of customers in low- and moderate-income geographies using online, telephone, mobile, and full-service ATMs are near the proportion of the population in low- and moderate-income geographies. Cash dispensing and text banking usage by customers in low- and moderate-income geographies exceeds the proportion of the population in low- and moderate-income geographies.

The bank has three financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low-income census tracts and 21 financial centers that are adjacent to moderate-income geographies. These adjacent financial centers provide additional access to retail banking services in low- and moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of service delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center in an upper-income geography and closed eleven. The bank closed three financial centers in low-income geographies and two in moderate-income geographies. The remaining six closures were in middle- and upper-income geographies.

Banking products and services do not vary in a way that inconvenience the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are generally consistent throughout the assessment area. Financial centers are generally open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm Friday, and 9:00 am to 1:00 pm Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Phoenix-Mesa-Scottsdale AZ MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	91	9.2	343,113	8.2	3	2.8	14	3.7	0	0.0	3	27.3
Moderate	243	24.5	1,035,604	24.7	22	20.8	77	20.4	0	0.0	2	18.2
Middle	336	33.9	1,509,434	36.0	37	34.9	144	38.2	0	0.0	3	27.3
Upper	311	31.4	1,297,760	31.0	43	40.6	130	34.5	1	100.0	3	27.3
NA	10	1.0	6,976	0.2	1	0.9	12	3.2	0	0.0	0	0.0
Totals	991	100.0	4,192,887	100.0	106	100.0	377	100.0	1	100.0	11	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Lake Havasu City-Kingman, AZ MSA

The bank provides a relatively limited level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide seven community development services targeted to low- and moderate-income individuals. Employees provided seven financial education workshops for 109 individuals. Attendees to the financial education workshops were primarily students from low- and

moderate-income families. The types of CD services provided are responsive to the needs identified in the community.

Phoenix-Mesa-Scottsdale, AZ MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 216 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 101 low- and moderate-income individuals and provided 53 financial education and foreclosure prevention workshops for 537 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 37 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 25 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Flagstaff, AZ MSA and Arizona Non-MSA is consistent with the Low Satisfactory Service Test performance in the state of Arizona. Performance in the Prescott, AZ MSA, Sierra Vista-Douglas, AZ MSA, and Tucson, AZ MSA is stronger than the Low Satisfactory Service Test performance in the state of Arizona. Performance is stronger primarily due to stronger financial center accessibility in moderate-income geographies.

State of Arkansas

CRA Rating for Arkansas¹⁶: **Satisfactory**
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Good volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively low level of CD lending that has a negative effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Arkansas

The state of Arkansas is Bank of America's 28th largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$4.2 billion or 0.4 percent of its total domestic deposits in financial centers within the state of Arkansas. Of the 127 depository financial institutions operating in the state, Bank of America, with a deposit market share of 6.9 percent, is the third largest. Competitors with deposit market shares greater than 5 percent include Arvest Bank (12.6 percent), Bank of the Ozarks (8.9 percent), Regions Bank (6.8 percent), Centennial Bank (6.3 percent), Simmons Bank (6 percent), and First Security Bank (6 percent). The state of Arkansas ranks 28th among 47 rating areas for total bank deposits. As of December 31, 2016, the bank operated 20 financial centers and 41 ATMs in Arkansas.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Little Rock-North Little Rock-Conway, AR MSA, Bank of America reported an additional \$1 billion in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external

¹⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

Refer to the community profiles for the state of Arkansas in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Arkansas

Examiners selected two assessment areas for full-scope reviews and the remaining two assessment areas for limited-scope reviews. The full-scope assessment areas selected included the Fayetteville-Springdale-Rogers, AR MSA and Little Rock-North Little Rock-Conway, AR MSA. While the Little Rock-North Little Rock-Conway, AR MSA carries approximately 86 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in Arkansas, examiners based the conclusions and ratings for the state on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 5,426 home mortgage loans totaling \$798.6 million, 4,892 small loans to businesses totaling \$125 million, 92 small loans to farms totaling nearly \$707,000, and 2 CD loans totaling \$444,000. Based on loan volume, examiners weighted home mortgage loans, representing 52 percent of the volume, the most followed by small loans to businesses (47 percent), and small loans to farms (1 percent).

Examiners conducted telephone interviews with two local government agencies. According to the agencies, although the local economies are stable and unemployment is low, affordable housing to own or rent remains a critical need.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Arkansas is rated High Satisfactory, based on good lending activity, good geographic distribution, good borrower income distribution, and relatively low levels of CD lending that have a negative effect on the Lending Test rating. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Arkansas is good. Lending activity is excellent in the Fayetteville-Springdale-Rogers, AR MSA and good in the Little Rock-North Little Rock-Conway, AR MSA.

Fayetteville-Springdale-Rogers, AR MSA

Lending activity in the Fayetteville-Springdale-Rogers, AR MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 4.3 percent. The bank ranks third among 35 depository financial institutions within the assessment area, which places it in the top 9 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.2 percent based on the number of home mortgage loans originated or purchased. The bank ranks 19th among 359 home mortgage lenders, which places it in the top 6 percent of lenders. Based on peer small business data for 2016, the bank has a 3.8 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks eighth among 88 small business lenders in the assessment area, which places it in the top 10 percent of lenders. For small loans to farms, the bank has a market share of 0.7 percent based on the number of small loans to farms originated or purchased. The bank ranks seventh among 23 farm lenders, which places it in the top 31 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and similar ranking for small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

Little Rock-North Little Rock-Conway, AR MSA

Lending activity in the Little Rock-North Little Rock-Conway, AR MSA is good. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 18.9 percent. The bank ranks second among 33 depository financial institutions in the assessment area, which places it in the top 7 percent of institutions. The bank's market share also includes \$1 billion in deposits not derived from the local assessment area. Excluding those nonlocal deposits, the bank's market share is 14.5 percent. According to peer mortgage data for 2016, the bank has a market share of 1.7 percent based on the number of home mortgage loans originated or purchased. The bank ranks 16th among 347 home mortgage lenders, which places it in the top 5 percent of lenders. Based on peer small business data for 2016, the bank has a 4.5 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks eighth among 91 small business lenders in the assessment area, which places it in the top 9 percent of lenders. The average size Bank of America's small loans to businesses is \$25,000, which is significantly higher than the average loan size originated by four of the five top competitors. A low average loan size can indicate the lender is a credit card issuer, which can skew the market based on the number of loans originated. For small loans to farms, the bank has a market share of 2.1 percent based on the number of small loans to farms originated or purchased. The bank ranks 12th among 19 farm lenders in the assessment area, which places it in the bottom 36 percent of lenders. Considering the higher ranking for home mortgage loans and ranking for small loans to businesses relative to its ranking for deposits, overall lending activity is good.

LENDING VOLUME		Geography: ARKANSAS						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Fayetteville, AR	33.30	1,740	278,372	1,470	29,239	38	298	0	0	3,248	307,909	9.61
Little Rock, AR	59.73	3,177	463,770	2,887	87,916	30	255	2	444	6,096	552,385	86.20
Limited Review												
Jonesboro, AR	4.27	269	36,274	346	3,133	17	121	0	0	632	39,528	2.05
Pine Bluff, AR	2.70	240	20,194	189	4,700	7	33	0	0	436	24,927	2.15
ARKANSAS	100.00	5,426	798,610	4,892	124,988	92	707	2	444	10,412	924,749	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is good in the Fayetteville-Springdale-Rogers, AR MSA and it is good in the Little Rock-North Little Rock-Conway, AR MSA.

Fayetteville-Springdale-Rogers, AR MSA

The geographic distribution of home mortgage loans in the Fayetteville-Springdale-Rogers, AR MSA is good. Performance is good in low-income geographies and good in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 1.2 percent is slightly lower than the 1.6 percent of owner-occupied housing units in low-income geographies, but is consistent with the 1.2 percent for aggregate lenders. The distribution in moderate-income geographies at 9.4 percent is lower than the 10.5 percent of owner-occupied housing units in moderate-income geographies; however, it exceeds the 8.1 percent for aggregate lenders.

Little Rock-North Little Rock-Conway, AR MSA

The geographic distribution of home mortgage loans in the Little Rock-North Little Rock-Conway, AR MSA is good. Performance is good in low-income geographies and good in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 1.9 percent is lower than the 2.8 percent of owner-occupied housing units in

low-income geographies, but it is higher than the 1.3 percent performance for aggregate lenders. The distribution in moderate-income geographies at 14.5 percent is lower than the 17.5 percent of owner-occupied housing units in moderate-income geographies; however, it exceeds the 10.7 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Fayetteville-Springdale-Rogers AR-MO MSA	726	120,350	32.4	20,299	1.6	1.2	1.2	10.5	9.4	8.1	56.9	52.9	51.7	31.0	36.5	38.9	0.0	0.0	0.0
FS Little Rock-North Little Rock-Conway AR MSA	1,306	194,613	58.4	26,510	2.8	1.9	1.3	17.5	14.5	10.7	50.8	43.4	50.7	29.0	40.2	37.4	0.0	0.0	0.0
LS Jonesboro AR MSA	112	16,547	5.0	4,228	2.7	0.9	2.0	25.5	23.2	20.0	43.1	35.7	37.4	28.7	40.2	40.6	0.0	0.0	0.0
LS Pine Bluff AR MSA	94	7,765	4.2	1,515	2.0	2.1	0.7	23.9	13.8	9.6	39.6	41.5	39.6	34.4	42.6	50.1	0.0	0.0	0.0
Total	2,238	339,275	100.0	52,552	2.4	1.7	1.3	16.5	13.2	10.4	51.2	46.0	49.7	30.0	39.1	38.6	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The distribution is excellent in the Fayette-Springdale-Rogers MSA and it is good in the Little Rock-North Little Rock-Conway, AR MSA.

Fayetteville-Springdale-Rogers, AR MSA

The geographic distribution of small loans to businesses in the Fayetteville-Springdale-Rogers, AR MSA is excellent. Performance is excellent in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 3.6 percent exceeds the 3.4 percent of businesses in low-income geographies and it exceeds the 3.3 percent performance for aggregate lenders. The distribution in moderate-income geographies at 18.3 percent is lower than the 19.2 percent of businesses in moderate-income geographies; however, it exceeds the 16.7 percent performance for aggregate lenders.

Little Rock-North Little Rock-Conway, AR MSA

The geographic distribution of small loans to businesses in the Little Rock-North Little Rock-Conway, AR MSA is good. The distribution is adequate in low-income geographies and good in moderate-income geographies. The geographic distribution in low-income geographies at 3.6 percent is below the 4.5 percent of businesses in low-income geographies and it is lower than the 4.2 percent performance for aggregate lenders. The geographic distribution in moderate-income geographies at 20.6 percent is lower than the 24.3 percent of businesses in

moderate-income geographies; however, it is slightly higher than the 20.1 percent performance of aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Busines ses	% Bank Loans	Aggre gate	% Busines ses	% Bank Loans	Aggre gate	% Busines ses	% Bank Loans	Aggre gate	% Busines ses	% Bank Loans	Aggre gate	% Busines ses	% Bank Loans	Aggre gate
FS Fayetteville-Springdale-Rogers AR-MO MSA	940	16,621	31.3	8,971	3.4	3.6	3.3	19.2	18.3	16.7	48.9	42.8	49.1	28.5	35.3	30.9	0.0	0.0	0.0
FS Little Rock-North Little Rock-Conway AR MSA	1,747	46,837	58.2	13,813	4.5	3.6	4.2	24.3	20.6	20.1	41.1	36.0	43.3	30.0	39.8	32.4	0.0	0.0	0.0
LS Jonesboro AR MSA	207	1,534	6.9	2,936	3.9	1.9	1.9	39.3	38.2	29.5	26.4	27.5	35.0	30.4	32.4	33.5	0.0	0.0	0.0
LS Pine Bluff AR MSA	106	1,874	3.5	1,050	4.7	7.5	4.0	28.2	27.4	23.2	40.0	37.7	47.2	27.1	27.4	25.5	0.0	0.0	0.0
Total	3,000	66,866	100.0	26,770	4.1	3.6	3.6	24.2	21.3	20.1	42.2	37.6	44.5	29.4	37.4	31.8	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is adequate. Performance is poor in the Fayetteville-Springdale-Rogers, AR MSA and it is good in the Little Rock-North Little Rock-Conway, AR MSA.

Fayetteville-Springdale-Rogers, AR MSA

The geographic distribution of small loans to farms in the Fayetteville-Springdale-Rogers, AR MSA is poor, based on adequate performance in low-income geographies and poor performance in moderate-income geographies. The geographic distribution of small loans to farms in low-income geographies at 0 percent is lower than the 1.7 percent of farms in low-income geographies, but it is consistent with the 0 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 0 percent is lower than the 12 percent of farms in moderate-income geographies and it is significantly lower than the 19.1 percent for aggregate lenders.

Little Rock-North Little Rock-Conway, AR MSA

The geographic distribution of small loans to farms in the Little Rock-North Little Rock-Conway, AR MSA is good, based on poor performance in low-income geographies and excellent performance in moderate-income geographies. The geographic distribution of small loans to farms in low-income geographies at 0 percent is lower than the 2.4 percent of farms in low-income geographies and it is lower than the 1.2 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 26.7 percent is higher than the 21.5 percent of farms in moderate-income geographies and it exceeds the 22.4 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Fayetteville-Springdale-Rogers AR-MO MSA	22	179	41.7	1,024	1.7	0.0	0.0	12.0	0.0	19.1	60.2	81.8	69.2	26.1	26.7	11.6	0.0	0.0	0.0
FS Little Rock-North Little Rock-Conway AR MSA	15	151	29.3	340	2.4	0.0	1.2	21.5	26.7	22.4	49.7	46.7	58.5	26.4	33.3	17.9	0.0	0.0	0.0
LS Jonesboro AR MSA	14	93	30.8	432	1.8	14.3	0.5	28.2	40.0	15.0	44.2	50.0	61.8	25.7	50.0	22.7	0.0	0.0	0.0
LS Pine Bluff AR MSA	2	10	6.5	204	1.0	0.0	0.0	37.0	0.0	42.6	47.8	100.0	48.0	14.2	100.0	9.3	0.0	0.0	0.0
Total	54	435	100.0	2,000	2.0	4.3	0.3	21.5	14.8	21.2	51.4	63.0	63.7	25.1	20.4	14.9	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Fayetteville-Springdale-Rogers, AR MSA and it is good in the Little Rock-North Little Rock-Conway, AR MSA.

Fayetteville-Springdale-Rogers, AR MSA

The distribution of home mortgage loans by borrower income in the Fayetteville-Springdale-Rogers, AR MSA is good. The distribution is adequate to low-income borrowers and good to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 9.6 percent is significantly lower than the 19.9 percent of low-income families in the MSA; however, the bank’s performance exceeds the 5.9 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 13.5 percent is

lower than the 18.1 percent of moderate-income families and it is slightly lower than the 14.9 percent performance for aggregate lenders.

Little Rock-North Little Rock-Conway, AR MSA

The distribution of home mortgage loans by borrower income in the Little Rock-North Little Rock-Conway, AR MSA is good. The distribution is adequate to low-income borrowers and excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 10.3 percent is well below the 21.4 percent of low-income families in the MSA; however, it exceeds the 6 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 19.3 percent exceeds the 17.9 percent of moderate-income families in the MSA and it exceeds the 15 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Fayetteville-Springdale-Rogers AR-MO MSA	726	120,350	32.4	20,299	19.9	9.6	5.9	18.1	13.5	14.9	20.5	17.2	17.3	41.4	51.2	42.5	0.0	8.4	19.4
FS Little Rock-North Little Rock-Conway AR MSA	1,306	194,613	58.4	26,510	21.4	10.3	6.0	17.9	19.3	15.0	20.5	20.2	18.8	40.2	38.9	35.0	0.0	11.3	25.1
LS Jonesboro AR MSA	112	16,547	7.2	4,228	24.2	8.0	3.6	17.0	11.6	11.5	18.9	12.5	18.8	40.0	59.8	44.4	0.0	8.0	21.6
LS Pine Bluff AR MSA	94	7,765	10.4	1,515	22.3	10.6	3.0	17.4	7.4	13.9	18.5	17.0	19.0	41.9	38.3	36.8	0.0	26.6	27.3
Total	2,238	339,275	100.0	52,552	21.2	10.0	5.7	17.9	16.5	14.7	20.2	18.7	18.2	40.7	43.9	38.7	0.0	10.9	22.7

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Fayetteville-Springdale-Rogers, AR MSA and it is good in the Little Rock-North Little Rock-Conway, AR MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 35 percent of its small loans to businesses.

Fayetteville-Springdale-Rogers, AR MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Fayetteville-Springdale-Rogers, AR MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 56.9 percent is lower than the 76 percent of businesses with gross annual revenues of \$1 million or less. Considering the

bank’s distribution exceeds the 52.8 percent for aggregate lenders, overall performance is good.

Little Rock-North Little Rock-Conway, AR MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Little Rock-North Little Rock-Conway, AR MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 55.4 percent is lower than the 76.4 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution exceeds the 45.8 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Fayetteville-Springdale-Rogers AR-MO MSA	940	16,621	31.3	8,971	76.0	56.9	52.8	4.6	8.4	19.4	34.7
FS Little Rock-North Little Rock-Conway AR MSA	1,747	46,837	58.2	13,813	76.4	55.4	45.8	5.3	9.6	18.3	35.0
LS Jonesboro AR MSA	207	1,534	6.9	2,936	74.3	54.1	46.9	5.7	6.8	20.0	39.1
LS Pine Bluff AR MSA	106	1,874	4.3	1,050	75.8	48.1	39.4	4.2	14.2	20.0	37.7
Total	3,000	66,866	100.0	26,770	76.1	55.5	48.0	5.1	9.2	18.8	35.3

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data: 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good, driven by primarily by performance in the Little Rock-North Little Rock-Conway, AR MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 41 percent of its small loans to farms.

Fayetteville-Springdale-Rogers, AR MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Fayetteville-Springdale-Rogers, AR MSA is poor. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 63.6 percent is significantly lower than the 95.8 percent of farms with gross annual revenues of \$1 million or less. The bank’s distribution is significantly lower than the 91 percent for aggregate lenders.

Little Rock-North Little Rock-Conway, AR MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Little Rock-North Little Rock-Conway, AR MSA is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 66.7 percent is also significantly lower than

the 97 percent of farms with gross annual revenues of \$1 million or less. However, the bank's distribution is higher than the 65 percent for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Fayetteville-Springdale-Rogers AR-MO MSA	22	179	43.5	1,024	95.8	63.6	91.0	2.0	10.0	2.3	31.8
FS Little Rock-North Little Rock-Conway AR MSA	15	151	27.8	340	97.0	66.7	65.0	1.7	0.0	1.3	33.3
LS Jonesboro AR MSA	14	93	30.6	432	96.6	28.6	52.5	2.4	18.2	1.1	57.1
LS Pine Bluff AR MSA	3	12	7.7	204	97.5	100.0	42.6	1.0	0.0	1.5	100.0
Total	54	435	100.0	2,000	96.6	53.7	73.4	1.8	8.3	1.6	40.7

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a negative effect overall on the bank's Lending Test performance in the state of Arkansas. The bank did not originate or purchase any CD loans in three of its four assessment areas during the evaluation period.

Fayetteville-Springdale-Rogers, AR MSA

In the Fayetteville-Springdale-Rogers, AR MSA, CD lending has a negative effect on the lending performance in the assessment area. During the evaluation period, the bank did not originate or purchase any CD loans.

Little Rock-North Little Rock-Conway, AR MSA

In the Little Rock-North Little Rock-Conway, AR MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated two CD loans totaling \$444,000. CD lending represents 0.1 percent of the allocated Tier 1 Capital, after considering more than \$1 billion in deposits from national corporations in which the deposits did not derive from the local community.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Arkansas, lending under the MHA and HARP programs accounted for 71 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Jonesboro, AR MSA is consistent with the High Satisfactory Lending Test performance in the state of Arkansas. Performance in the Pine Buff, AR MSA is

weaker than the overall High Satisfactory Lending Test performance in the state of Arkansas primarily due to weaker borrower income distributions and or limited levels of CD lending.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of Arkansas section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Arkansas is rated Outstanding. Investment performance is poor in the Fayetteville-Springdale-Rogers, AR MSA and excellent in the Little Rock-North Little Rock-Conway, AR MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Fayetteville-Springdale-Rogers, AR MSA

In the Fayetteville-Springdale-Rogers, AR MSA, Bank of America has a poor level of community development investments. The bank made 24 CD investments during the evaluation period totaling \$1.5 million. Approximately \$1.5 million or 97 percent of the current period investment dollars originated during the evaluation period supported 53 units of affordable housing. In addition, the bank has 9 CD investments totaling \$359,000 it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$1.9 million or 3.8 percent of allocated Tier 1 Capital. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$1.3 million or 86 percent of the investment dollars.

Little Rock-North Little Rock-Conway, AR MSA

In the Little Rock-North Little Rock-Conway, AR MSA, the bank has an excellent level of CD investments. The bank made 141 CD investments during the evaluation period totaling \$38.9 million. Approximately \$38 million or 92 percent of the current period investment dollars supported 468 units of affordable housing. In addition, the bank has 51 CD investments totaling \$11.2 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$50.1 million or 15.4 percent of allocated Tier 1 Capital, after considering more than \$1 billion in deposits that did not originate from the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$36.9 million or 95 percent of the investment dollars.

Examples of community development investments include:

- The bank made five annual contributions of \$35,000 each year to Baptist Health Foundation to help fund free healthcare through their Community Wellness Centers to homeless individuals and low-income families throughout Little Rock. All clients served are at or below the federal poverty level.
- The bank made a \$1.4 million investment in LiftFund, Inc., of which the bank allocated \$70,000 of the investment toward the Little Rock-North Little Rock-Conway, AR MSA. LiftFund, Inc. is a certified CDFI, formerly known as ACCION Texas, and it is a micro and small business lender. LiftFund used the investment funds to expand its micro and small business loan pool that offers loans from \$500 to \$250,000 to borrowers considered “unbankable” by traditional commercial lenders. LiftFund borrowers typically create an average of six jobs for every \$50,000 borrowed. The investment is responsive to the community’s need for small business access to capital.
- The bank invested more than \$847,000 in a fund that acquires direct and indirect investments in partnerships that own affordable housing projects across the nation that are financed in part with LIHTCs. This investment represents 51 units of affordable housing within the assessment area.

QUALIFIED INVESTMENTS		Geography: ARKANSAS				Evaluation Period: January 1, 2012 to December 31, 2016			
		Prior Period Investments*		Current Period Investments		Total Investments		Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Fayetteville, AR	9	359	24	1,540	33	1,899	3.28	0	0
Little Rock, AR	51	11,230	141	38,875	192	50,105	86.60	0	0
Limited Review									
Jonesboro, AR	2	52	9	1,320	11	1,371	2.37	0	0
Pine Bluff, AR	6	155	14	333	20	488	0.84	0	0
ARKANSAS - Statewide	0	0	13	162	13	162	0.28	0	0
ARKANSAS - Non Assessed	23	2,825	23	1,007	46	3,832	6.62	0	0
ARKANSAS	91	14,621	224	43,237	315	57,858	100.00	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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Jonesboro, AR MSA is consistent with the Outstanding Investment Test performance in the state of Arkansas. Performance in the Pine Bluff, AR MSA is weaker than the overall Outstanding Investment Test performance in the state of Arkansas primarily due to lower levels of CD investments relative to the bank’s size and resources.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Arkansas is rated High Satisfactory. Service Test performance is excellent in the Fayetteville-Springdale-Rogers, AR MSA and it is good in the Little Rock-North Little Rock-Conway, AR MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Fayetteville-Springdale-Rogers, AR MSA

In the Fayetteville-Springdale-Rogers, AR MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's six financial centers with the distribution of the population. The bank has one financial center in a low-income geography or 16.7 percent of its financial centers. Approximately 3.9 percent of the population lives in low-income geographies. The bank also has one financial center or 16.7 percent of its financial centers located in a moderate-income geography. Approximately 15.3 percent of the population lives in moderate-income geographies.

Examiners also considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. Approximately 19 percent of the population resides in low- and moderate-income geographies. The percentages of customers using ADS are near to or exceed 19 percent.

The bank has three financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low and moderate-income census tracts. The adjacent financial centers help improve access to retail banking services to individuals in low- and moderate-income geographies.

Financial center openings and closings generally did not affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank closed two financial centers in moderate-income geographies during the evaluation period. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are consistent throughout the assessment area. Financial centers are open 9:00 am to 4:00 pm

Monday through Thursday, 9:00 am to 5:00 pm on Friday, and 9:00 am to 12:00 pm on Saturday. The University of Arkansas financial center, located in a moderate-income geography, is not open on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Fayetteville-Springdale-Rogers AR-MO MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	3	3.5	17,000	3.9	1	16.7	2	20.0	0	0.0	0	0.0
Moderate	13	15.3	67,505	15.3	1	16.7	2	20.0	0	0.0	2	100.0
Middle	46	54.1	239,341	54.4	4	66.7	6	60.0	0	0.0	0	0.0
Upper	23	27.1	116,275	26.4	0	0.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	85	100.0	440,121	100.0	6	100.0	10	100.0	0	100.0	2	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Little Rock-North Little Rock-Conway, AR MSA

In the Little Rock-North Little Rock-Conway, AR MSA, the bank’s service delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 12 financial centers with the distribution of the population. The bank has no financial centers in low-income geographies where only 5 percent of the population lives. The bank has four financial centers or 33.3 percent of its financial centers located in moderate-income geographies where 20.6 percent of the population lives.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The proportions of customers in low- and moderate-income geographies using ADS are near to or exceed the percentage of the population residing in low- and moderate-income geographies.

The bank has two financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to moderate-income census tracts. These adjacent financial centers provide low- and moderate-income individuals and geographies additional access to retail banking services.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center in a middle-income geography and closed two financial centers in moderate-income geographies, two in middle-income geographies, and one in an upper-income geography. Despite the closures, financial centers remain accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconvenience the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are

generally consistent throughout the assessment area. Financial centers are generally open 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 5:00 pm on Friday, and 9:00 am to 12:00 pm on Saturday. The Little Rock Main Office, located in a moderate-income geography, is not open on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Little Rock-North Little Rock-Conway AR MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	11	6.7	34,878	5.0	0	0.0	1	3.8	0	0.0	0	0.0
Moderate	39	23.8	144,037	20.6	4	33.3	10	38.5	0	0.0	2	40.0
Middle	77	47.0	331,848	47.4	3	25.0	7	26.9	1	100.0	2	40.0
Upper	36	22.0	188,992	27.0	5	41.7	8	30.8	0	0.0	1	20.0
NA	1	0.6	2	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	164	100.0	699,757	100.0	12	100.0	26	100.0	1	100.0	5	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Fayetteville-Springdale-Rogers, AR MSA

The bank provides a limited level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 13 community development services targeted to low- and moderate-income individuals. Employees provided four financial education workshops for 163 students that are primarily from low- and moderate-income families. Employees participated in nine webinars and workshops with non-profit organizations to help the organizations with capacity building. No employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Little Rock-North Little Rock-Conway, AR MSA

The bank is a leader in providing community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 93 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 49 low- and moderate-income individuals and provided 19 financial education workshops for 256 individuals. Attendees to the financial education workshops were primarily elementary school students from low- and moderate-income families. Employees participated in 17 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, nine employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Pine Bluff, AR MSA is consistent with the High Satisfactory Service Test performance in the state of Arkansas. Performance in the Jonesboro, AR MSA is weaker than the overall High Satisfactory Service Test performance in the state of Arkansas primarily due to the bank’s limited financial center presence in the assessment area.

State of California

CRA Rating for California¹⁷: **Outstanding**
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Good volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively high level of CD lending that has a positive effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in California

The state of California is Bank of America's largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$275.5 billion or 22.9 percent of its total domestic deposits in financial centers within the state of California. Of the 222 depository financial institutions operating in the state, Bank of America, with a deposit market share of 21.8 percent, is the state's largest. As of December 31, 2016, Bank of America operated 896 financial centers and 3,692 deposit-taking ATMs in the state. Wells Fargo is the state's second largest depository financial institution with 1,060 branches and \$247.6 billion in deposits or 19.6 percent market share. JPMorgan Chase Bank is the third largest depository financial institution with 1,003 branches and \$119 billion in deposits or 9.4 percent market share. MUFG Union Bank is the state's fourth largest depository financial institution with 331 branches and \$78.9 billion in deposits or 6.2 percent market share. Fourteen other depository financial institutions have more than \$10 billion in deposits in the state of California.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the San Francisco-Oakland-Hayward, CA MSA, Bank of America reported \$18.1 billion in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations.

¹⁷ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

Refer to the community profiles for the state of California in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in California

Examiners selected four assessment areas for full-scope reviews and the remaining twenty-three assessment areas for limited-scope reviews. The full-scope assessment areas included the Fresno, CA MSA, Los Angeles-Long Beach-Anaheim, CA MSA, Riverside-San Bernardino-Ontario, CA MSA, and San Francisco-Oakland-Hayward, CA MSA. While the Los Angeles-Long Beach-Anaheim and San Francisco-Oakland-Hayward, CA MSAs together carry approximately 75 percent of the weight of the overall conclusions based on the bank's presence in those assessment areas relative to all assessment areas in California. Examiners based the conclusions and ratings for the state on the activities within all assessment areas.

During the evaluation period, Bank of America originated or purchased 311,204 home mortgage loans totaling \$122.9 billion, 443,525 small loans to businesses totaling \$12.4 billion, 4,022 small loans to farms totaling \$147.6 million, and 590 CD loans totaling over \$3 billion. Lending volumes include loans originated or purchased in the following six counties that the bank no longer designates as assessment areas due to the bank's closure or sale of all financial centers and deposit-taking ATMs: Colusa, Del Norte, Glenn, Humboldt, Plumas, and Siskiyou counties. These counties were part of the California Non-MSA assessment area. Based on loan volume, examiners weighted small loans businesses, representing 58.5 percent of the volume, the most followed by home mortgage loans (41 percent), and small loans to farms (0.5 percent).

The bank did not originate or purchase sufficient volumes of small loans to farms in the Redding, CA MSA to provide any meaningful analyses.

The OCC interviewed six local government agencies and nonprofit organizations, which identified affordable housing, small dollar lending for businesses, and flexible lending for small businesses as some of the more pressing community development needs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of California is rated Outstanding, based on good lending activity, good geographic and borrower income distributions, and a relatively high level of CD lending that positively affected overall

performance under the Lending Test. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of California is good. Lending activity is excellent in the Fresno, CA MSA and Riverside-San Bernardino-Ontario, CA MSA, and good in the Los Angeles-Long Beach-Anaheim MSA and San Francisco-Oakland-Hayward, CA MSA.

Fresno, CA MSA

Lending activity in the Fresno, CA MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 16.6 percent. The bank ranks second among 26 depository financial institutions in the assessment area, which places the bank in the top 8 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.1 percent based on the number of home mortgage loans originated or purchased. The bank ranks 10th among 445 home mortgage lenders in the assessment area, which places it in the top 3 percent of home mortgage lenders. Based on peer small business data for 2016, the bank has a 6.1 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fourth among 81 small business lenders, which places it in the top 5 percent of lenders. For small loans to farms, the bank has a 16.7 percent market share based on the number of small loans to farms originated or purchased. The bank ranks second among 26 farm lenders, which places it in the top 8 percent of lenders. Considering the bank's higher ranking among all lenders for small loans to businesses relative to its ranking for deposits and the greater weight placed on small loans to businesses, overall lending activity is excellent.

Los Angeles-Long Beach-Anaheim, CA MSA

Lending activity in the Los Angeles-Long Beach-Anaheim, CA MSA is good. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 18.5 percent. The bank ranks first among 121 depository financial institutions in the assessment area, which places it in the top 1 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 4.4 percent based on the number of home mortgage loans originated or purchased. The bank ranks third among 941 home mortgage lenders, which places it in the top 1 percent of home mortgage lenders. Based on peer small business data for 2016, the bank has a 9.9 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks third among 220 small business lenders, which places it in the top 2 percent of lenders. For small loans to farms, the bank has a market share of 15.9 percent based on the number of small loans to farms originated or purchased. The bank ranks third among 21 farm lenders, which places it in the top 15 percent of lenders. Considering the bank's lower relative ranking among all lenders for small loans to businesses relative to its ranking for deposits and the greater weight placed on small loans to businesses, overall lending activity is good.

Riverside-San Bernardino-Ontario, CA MSA

Lending activity in the Riverside-San Bernardino-Ontario, CA MSA is excellent. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 21.4 percent. The bank ranks first among 45 depository financial institutions in the assessment area, which places it in the top 3 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.4 percent based on the number of home mortgage loans originated or purchased. The bank ranks 10th among 814 home mortgage lenders, which places it in the top 2 percent of lenders. Based on peer small business data for 2016, the bank has a 9.2 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks third among 155 small business lenders, which places it in the top 2 percent of lenders. For small loans to farms, the bank has a market share of 23.4 percent based on the number of small loans to farms originated or purchased. The bank ranks first among 17 farm lenders, which places it in the top 6 percent of lenders. Considering the bank's rankings among all lenders for home mortgage loans and small loans to businesses are consistent with its ranking for deposits, overall lending activity is excellent.

San Francisco-Oakland-Hayward, CA MSA

Lending activity in the San Francisco-Oakland-Hayward, CA MSA is good. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 34.5 percent. The bank ranks first among 70 depository financial institutions in the assessment area, which places it in the top 2 percent of institutions. The bank's market share also includes \$18.1 billion in deposits not derived from the local assessment area. Excluding those nonlocal deposits, the bank's market share is 30.8 percent. According to peer mortgage data for 2016, the bank has a market share of 5.1 percent based on the number of home mortgage loans originated or purchased. The bank ranks third among 744 home mortgage lenders, which places it in the top 1 percent of lenders. Based on peer small business data for 2016, the bank has an 8.6 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fifth among 180 small business lenders, which places it in the top 3 percent of lenders. For small loans to farms, the bank has a market share of 14.2 percent based on the number of small loans to farms originated or purchased. The bank ranks third among 20 farm lenders, which places it in the top 15 percent of lenders. Considering the bank's lower ranking among all lenders for small loans to businesses relative to its ranking for deposits and the greater weight placed on small loans to businesses, overall lending activity is good.

LENDING VOLUME		Geography: CALIFORNIA						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Fresno, CA	1.54	5,246	920,649	6,035	200,724	428	32,268	6	4,918	11,715	1,158,559	0.80
Los Angeles, CA	39.70	102,054	46,482,811	198,871	5,701,906	287	6,245	257	1,138,188	301,469	53,329,150	33.05
Riverside, CA	9.54	34,969	7,922,226	37,233	954,645	237	5,672	38	124,279	72,477	9,006,822	3.57
San Francisco, CA	15.35	48,997	25,952,851	67,286	1,952,990	162	2,761	116	1,134,078	116,561	29,042,680	42.04
Limited Review												
Bakersfield, CA	1.39	5,532	881,146	4,805	118,486	179	5,627	10	25,085	10,526	1,030,344	0.62
Chico, CA	0.34	1,469	271,066	1,087	20,767	57	1,087	0	0	2,613	292,920	0.21
El Centro, CA	0.18	670	94,663	648	16,086	34	390	0	0	1,352	111,139	0.10
Hanford, CA	0.17	714	110,731	553	16,057	40	1,860	0	0	1,307	128,648	0.06
Madera, CA	0.24	895	141,200	772	23,069	136	9,360	0	0	1,803	173,629	0.09
Merced, CA	0.37	1,556	231,303	1,070	28,308	168	8,971	1	2,463	2,795	271,045	0.12
Modesto, CA	0.88	3,767	640,634	2,778	81,275	151	4,002	1	2,361	6,697	728,272	0.42
Napa, CA	0.39	1,257	529,004	1,625	51,737	76	2,129	0	0	2,958	582,870	0.20
Oxnard, CA	2.31	7,773	2,856,584	9,593	255,999	161	4,194	16	68,440	17,543	3,185,217	1.39
Redding, CA	0.31	1,208	211,345	1,104	32,223	22	385	0	0	2,334	243,953	0.16
Sacramento, CA	4.96	18,392	4,482,144	18,970	520,425	246	3,589	22	79,166	37,630	5,085,324	2.78
Salinas, CA	0.79	3,082	1,103,205	2,799	78,675	134	4,456	2	524	6,017	1,186,860	0.52
San Diego, CA	7.43	24,608	9,938,275	31,587	919,237	170	3,711	54	241,285	56,419	11,102,508	4.35
San Jose, CA	6.67	21,796	12,947,608	28,707	722,557	137	5,073	34	140,601	50,674	13,815,839	6.11
San Luis Obispo, CA	0.54	1,607	496,261	2,387	71,284	130	4,540	4	14,867	4,128	586,952	0.29
Santa Cruz, CA	0.61	1,705	691,474	2,875	51,642	58	1,873	1	184	4,639	745,173	0.33
Santa Maria, CA	0.80	2,647	1,364,466	3,317	101,062	77	1,037	13	16,658	6,054	1,483,223	0.56
Santa Rosa, CA	1.11	3,658	1,249,609	4,641	138,835	136	3,632	7	24,368	8,442	1,416,444	0.53
Stockton, CA	1.22	4,746	901,130	4,355	104,967	176	7,150	1	1,161	9,278	1,014,408	0.51
Vallejo, CA	0.79	3,671	844,925	2,327	58,107	31	370	0	0	6,029	903,402	0.38
Visalia, CA	0.71	2,695	387,773	2,444	70,040	267	18,438	2	2,248	5,408	478,499	0.30
Yuba City, CA	0.28	1,261	213,269	785	25,684	101	4,440	3	1,584	2,150	244,977	0.12
California Non-MSA	1.36	5,229	1,074,932	4,871	119,620	221	4,343	2	3,104	10,323	1,201,999	0.42
CALIFORNIA	100.00	311,204	122,941,284	443,525	12,436,407	4,022	147,603	590	3,025,563	759,341	138,550,857	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is adequate. The distribution is good in the Fresno, CA MSA, adequate in the Los Angeles-Long Beach-Anaheim, CA MSA, good in the Riverside-San Bernardino-Ontario, CA MSA, and adequate in the San Francisco-Oakland-Hayward, CA MSA.

Fresno, CA MSA

The geographic distribution of home mortgage loans in the Fresno, CA MSA is good. Performance is good in low- and moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 3.2 percent is lower than the 5 percent of owner-occupied housing units in low-income geographies, but it is higher than the 2.9 percent for aggregate lenders. The distribution in moderate-income geographies at 16.6 percent is lower than the 20.8 percent of owner-occupied housing units in moderate-income geographies; however, it is higher than the 14.5 percent for aggregate lenders.

Los Angeles-Long Beach-Anaheim, CA MSA

The geographic distribution of home mortgage loans in the Los Angeles-Long Beach-Anaheim, CA MSA is adequate. Performance is adequate in low-income geographies and it is adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 1.6 percent is lower than the 2.4 percent of owner-occupied housing units in low-income geographies and it is lower than the 2.3 percent performance for aggregate lenders. The distribution in moderate-income geographies at 12.9 percent is lower than the 17.4 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 16.9 percent performance for aggregate lenders.

Riverside-San Bernardino-Ontario, CA MSA

The geographic distribution of home mortgage loans in the Riverside-San Bernardino-Ontario, CA MSA is good. Performance is good in low-income geographies and it is good in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 2.3 percent is slightly lower than the 2.9 percent of owner-occupied housing units in low-income geographies; however, it is greater than the 2.1 percent performance for aggregate lenders. The distribution in moderate-income geographies at 16.6 percent is lower than the 21.6 percent of owner-occupied housing units in moderate-income geographies; however, it is higher than the 15.9 percent performance for aggregate lenders.

San Francisco-Oakland-Hayward, CA MSA

The geographic distribution of home mortgage loans in the San Francisco-Oakland-Hayward, CA MSA is adequate. Performance is adequate in low-income geographies and it is adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 3.4 percent is lower than the 4.6 percent of owner-occupied housing units in low-income geographies and it is lower than the 4.8 percent performance for aggregate lenders. The distribution in moderate-income geographies at 10.8 percent is lower than the 14.5 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 14.2 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Fresno CA MSA	1,710	293,147	1.3	26,733	5.0	3.2	2.9	20.8	16.6	14.5	27.8	26.8	25.0	46.5	53.3	57.6	0.0	0.0	0.0
FS Los Angeles-Long Beach-Anaheim CA MSA	46,266	25,709,874	34.5	418,285	2.4	1.6	2.3	17.4	12.9	16.9	29.9	25.0	29.5	50.3	60.5	51.3	0.0	0.1	0.1
FS Riverside-San Bernardino-Ontario CA MSA	13,186	3,167,890	9.8	192,442	2.9	2.3	2.1	21.6	16.6	15.9	36.3	36.2	36.6	39.2	44.9	45.4	0.0	0.0	0.0
FS San Francisco-Oakland-Hayward CA MSA	23,716	14,491,507	17.7	192,850	4.6	3.4	4.8	14.5	10.8	14.2	39.9	34.5	40.4	41.0	51.3	40.6	0.0	0.0	0.0
LS Bakersfield CA MSA	1,984	294,664	1.5	26,180	2.0	1.2	0.7	23.2	20.8	14.6	30.8	25.7	25.6	44.1	52.4	59.1	0.0	0.0	0.0
LS California Non-MSA	1,482	339,128	1.1	19,179	0.4	0.3	0.2	11.3	7.5	7.7	54.0	48.7	48.1	34.4	43.5	43.9	0.0	0.0	0.0
LS Chico CA MSA	577	115,407	0.4	7,290	0.3	0.5	0.6	14.5	14.9	14.1	56.0	49.6	50.9	29.2	35.0	34.4	0.0	0.0	0.0
LS El Centro CA MSA	273	34,215	0.2	4,244	0.0	0.0	0.0	22.4	13.2	12.6	51.9	58.2	51.2	25.7	28.6	36.3	0.0	0.0	0.0
LS Hanford-Corcoran CA MSA	248	38,954	0.2	4,202	0.0	0.0	0.0	27.9	20.2	15.2	25.6	28.6	25.8	46.5	51.2	59.0	0.0	0.0	0.0
LS Madera CA MSA	294	43,002	0.2	4,430	0.0	0.0	0.0	19.8	20.1	21.5	60.7	62.9	55.6	19.5	17.0	23.0	0.0	0.0	0.0
LS Merced CA MSA	538	76,840	0.4	7,762	1.2	0.7	0.6	23.8	19.9	19.9	40.4	37.5	32.5	34.6	41.8	47.0	0.0	0.0	0.0
LS Modesto CA MSA	1,414	224,288	1.1	20,762	1.2	1.2	1.0	14.6	12.8	10.8	44.4	46.4	45.5	39.9	39.6	42.7	0.0	0.0	0.0
LS Napa CA MSA	584	279,866	0.4	5,798	0.0	0.0	0.0	22.4	21.1	22.9	45.5	43.8	44.1	32.1	35.1	33.1	0.0	0.0	0.0
LS Oxnard-Thousand Oaks-Ventura CA MSA	3,300	1,387,881	2.5	36,739	1.9	1.6	2.0	17.1	15.7	15.2	43.2	37.3	44.8	37.8	45.4	38.1	0.0	0.0	0.0
LS Redding CA MSA	366	62,661	0.3	7,072	0.0	0.0	0.0	20.8	23.2	20.6	53.8	46.7	52.5	25.4	30.1	26.8	0.0	0.0	0.0
LS Sacramento-Roseville-Arden-Arcade CA MSA	6,760	1,826,771	5.0	113,622	3.7	2.8	3.3	18.0	15.1	15.3	41.2	39.1	39.7	37.1	43.0	41.7	0.0	0.0	0.0
LS Salinas CA MSA	1,265	517,944	0.9	11,762	1.8	1.6	1.2	16.1	13.7	14.4	37.7	36.9	41.9	44.4	47.8	42.4	0.0	0.0	0.0
LS San Diego-Carlsbad CA MSA	10,226	4,919,229	7.6	141,802	3.3	2.7	3.2	14.3	10.6	13.2	38.8	29.4	38.1	43.6	57.3	45.5	0.0	0.0	0.0
LS San Jose-Sunnyvale-Santa Clara CA MSA	11,341	7,702,569	8.5	80,390	4.4	2.9	4.9	18.7	15.5	20.9	39.5	36.7	41.4	37.5	44.9	32.8	0.0	0.0	0.0
LS San Luis-Obispo-Paso Robles-Arroyo CA MSA	634	216,963	0.5	12,838	0.3	0.0	0.5	5.6	6.5	6.8	66.3	61.7	68.0	27.8	31.9	24.6	0.0	0.0	0.0
LS Santa Cruz-Watsonville CA MSA	759	351,882	0.6	10,024	0.5	0.1	0.4	22.3	15.9	20.7	36.6	39.7	37.0	40.6	44.3	41.9	0.0	0.0	0.0
LS Santa Maria-Santa Barbara CA MSA	1,022	685,263	0.8	13,960	2.8	3.1	3.4	15.1	16.5	17.7	34.9	25.8	35.4	47.1	54.5	43.5	0.0	0.0	0.0
LS Santa Rosa CA MSA	1,500	589,235	1.1	20,967	0.1	0.0	0.2	16.6	14.3	18.0	58.5	58.6	59.2	24.8	27.1	22.5	0.0	0.0	0.0
LS Stockton-Lodi MSA	1,802	350,677	1.3	29,040	2.2	1.1	1.5	20.8	15.8	13.9	33.0	33.2	30.9	44.0	49.9	53.8	0.0	0.0	0.0
LS Vallejo-Fairfield CA MSA	1,428	338,703	1.1	22,460	0.6	0.6	0.5	16.5	12.5	13.1	51.0	48.0	49.6	32.0	38.9	36.8	0.0	0.0	0.0
LS Visalia-Porterville CA MSA	962	125,909	0.7	12,554	0.7	0.6	0.2	22.5	21.2	12.9	34.6	32.4	27.5	42.2	45.7	59.3	0.0	0.0	0.0
LS Yuba City CA MSA	358	55,749	0.3	6,426	1.4	1.1	0.7	19.0	17.3	15.2	36.0	32.4	35.9	43.6	49.2	48.2	0.0	0.0	0.0
Total	133,995	64,240,218	100.0	1,449,813	2.8	2.1	2.6	17.6	13.5	15.6	37.0	32.3	36.6	42.6	52.0	45.0	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data. "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Fresno, CA MSA, Los Angeles-Long Beach-Anaheim, CA MSA, Riverside-San Bernardino-Ontario, CA MSA, and San Francisco-Oakland-Hayward, CA MSA.

Fresno, CA MSA

The geographic distribution of small loans to businesses in the Fresno, CA MSA is excellent. Performance is good in low-income geographies and it is excellent in moderate-income geographies. The distribution in low-income geographies at 8.3 percent is lower than the 9.5 percent of businesses in low-income geographies; however, it is higher than the 6.3 percent performance for aggregate lenders. The distribution in moderate-income geographies at 22.6 percent is slightly lower than the 23.7 percent of businesses in moderate-income geographies; however, it exceeds the 19.4 percent performance for aggregate lenders.

Los Angeles-Long Beach-Anaheim, CA MSA

The geographic distribution of small loans to businesses in the Los Angeles-Long Beach-Anaheim, CA MSA is excellent. The distribution is excellent in low-income geographies and it is excellent in moderate-income geographies. The geographic distribution in low-income geographies at 6.6 percent is higher than the 6 percent of businesses in low-income geographies and it exceeds the 5.1 percent performance for aggregate lenders. The geographic distribution in moderate-income geographies at 22.1 percent is higher than the 20.1 percent of businesses in moderate-income geographies and it exceeds the 18.7 percent performance of aggregate lenders.

Riverside-San Bernardino-Ontario, CA MSA

The geographic distribution of small loans to businesses in the Riverside-San Bernardino-Ontario, CA MSA is excellent. The distribution is excellent in low-income geographies and it is excellent in moderate-income geographies. The geographic distribution in low-income geographies at 4.2 percent is slightly lower than the 4.4 percent of businesses in low-income geographies; however, it exceeds the 3 percent performance for aggregate lenders. The geographic distribution in moderate-income geographies at 23.7 percent is slightly lower than the 24 percent of businesses in moderate-income geographies; however, it exceeds the 20.7 percent performance of aggregate lenders.

San Francisco-Oakland-Hayward, CA MSA

The geographic distribution of small loans to businesses in the San Francisco-Oakland-Hayward, CA MSA is excellent. The distribution is excellent in low-income geographies and it is excellent in moderate-income geographies. The geographic distribution in low-income geographies at 12 percent is slightly lower than the 12.9 percent of businesses in low-income geographies; however, it exceeds the 9.7 percent performance for aggregate lenders. The

geographic distribution in moderate-income geographies at 16.7 percent is greater than the 14.7 percent of businesses in moderate-income geographies and it exceeds the 14.6 percent performance of aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Fresno CA MSA	4,047	128,831	1.3	22,850	9.5	8.3	6.3	23.7	22.6	19.4	26.1	29.8	24.8	40.5	39.2	49.5	0.2	0.1	0.0
FS Los Angeles-Long Beach-Anaheim CA MSA	138,838	3,730,150	45.6	523,485	6.0	6.6	5.1	20.1	22.1	18.7	27.3	28.7	27.0	45.5	41.9	48.4	1.2	0.8	0.9
FS Riverside-San Bernardino-Ontario CA MSA	26,338	642,812	8.7	111,947	4.4	4.2	3.0	24.0	23.7	20.7	34.2	32.9	32.8	37.3	39.2	43.4	0.1	0.0	0.0
FS San Francisco-Oakland-Hayward CA MSA	45,514	1,248,717	14.9	193,503	12.9	12.0	9.7	14.7	16.7	14.6	33.8	35.0	35.8	38.5	36.4	39.9	0.1	0.0	0.0
LS Bakersfield CA MSA	3,285	73,785	1.1	18,274	3.7	3.7	2.7	20.6	24.3	16.6	30.1	26.1	25.2	45.6	45.6	55.5	0.0	0.6	0.0
LS Chico CA MSA	694	13,166	0.2	12,377	0.4	0.0	0.3	28.3	24.2	14.7	43.2	43.4	43.6	28.1	32.4	41.4	0.0	0.0	0.0
LS El Centro CA MSA	416	8,451	0.1	2,660	0.0	0.0	0.0	31.6	33.7	26.9	45.6	50.2	48.6	22.8	16.1	24.5	0.0	0.0	0.0
LS Hanford-Corcoran CA MSA	360	10,708	0.1	2,010	0.0	0.0	0.0	39.8	39.2	30.0	20.8	22.5	26.6	39.3	38.3	43.3	0.2	0.0	0.1
LS Madera CA MSA	513	12,691	0.2	3,301	0.0	0.0	0.0	25.1	29.0	20.8	59.9	56.3	58.9	15.0	14.6	20.4	0.0	0.0	0.0
LS Merced CA MSA	718	16,709	0.2	5,097	2.2	1.0	1.1	39.7	37.9	27.6	28.4	34.7	35.9	29.7	26.5	35.3	0.0	0.0	0.0
LS Modesto CA MSA	1,890	48,337	0.6	12,465	2.4	3.2	2.1	19.1	21.1	16.4	44.4	41.4	42.6	34.2	34.3	38.9	0.0	0.0	0.0
LS Napa CA MSA	1,087	30,688	0.4	5,250	0.0	0.0	0.0	29.7	27.5	24.9	41.0	40.8	41.5	28.4	31.2	32.6	0.9	0.6	1.0
LS Oxnard-Thousand Oaks-Ventura CA MSA	6,497	161,299	2.1	32,805	3.4	4.0	2.9	18.8	21.3	16.0	44.6	39.4	41.8	33.2	35.2	39.4	0.0	0.0	0.0
LS Redding CA MSA	677	17,324	0.2	5,845	0.0	0.0	0.0	34.2	32.5	26.3	47.8	48.2	50.3	18.0	19.4	23.4	0.0	0.0	0.0
LS Sacramento-Roseville-Arden-Arcade CA MSA	12,889	335,693	4.2	68,359	7.0	7.9	5.8	20.9	21.7	17.1	38.8	36.8	37.8	33.3	33.6	39.3	0.0	0.0	0.0
LS Salinas CA MSA	1,806	53,207	0.6	9,770	1.4	2.8	1.3	18.9	19.2	16.9	38.9	41.0	39.9	40.3	35.9	41.5	0.6	1.1	0.4
LS Santa Maria-Santa Barbara CA MSA	2,247	60,693	0.7	13,631	13.2	11.4	9.5	21.6	23.9	19.8	26.4	25.6	27.9	38.3	38.6	42.2	0.5	0.5	0.6
LS Santa Cruz-Watsonville CA MSA	1,900	35,550	0.6	10,597	2.0	1.6	1.0	21.1	20.8	19.6	43.5	44.2	41.7	33.4	33.4	37.6	0.0	0.0	0.0
LS San Diego-Carlsbad CA MSA	21,427	602,372	7.0	123,509	5.8	5.9	4.4	15.5	16.5	14.1	35.3	32.9	34.4	43.3	44.7	47.1	0.1	0.1	0.1
LS San Jose-Sunnyvale-Santa Clara CA MSA	19,317	458,203	6.3	73,140	6.0	6.5	5.4	22.0	22.7	22.3	34.7	37.9	36.8	37.3	32.9	35.5	0.1	0.0	0.0
LS San Luis-Obispo-Paso Robles-Arroyo CA MSA	1,505	43,451	0.5	12,602	2.0	2.3	1.3	10.5	10.3	8.6	60.6	60.2	59.0	26.8	27.2	31.1	0.1	0.0	0.0
LS Santa Rosa CA MSA	3,034	89,510	1.0	19,124	3.6	2.7	2.1	19.9	20.5	17.3	53.1	53.0	53.8	23.3	23.8	26.8	0.0	0.0	0.0
LS Stockton-Lodi MSA	3,053	65,376	1.0	16,044	8.0	5.8	5.3	22.3	21.2	17.3	31.0	27.7	30.0	38.7	45.2	47.3	0.0	0.0	0.0
LS Vallejo-Fairfield CA MSA	1,642	38,088	0.5	9,738	2.0	1.5	1.4	24.2	27.5	18.5	47.0	46.8	45.6	26.6	24.3	34.5	0.2	0.0	0.0
LS Visalia-Porterville CA MSA	1,726	48,551	0.6	9,378	1.3	1.8	1.2	27.4	29.7	22.3	28.5	32.0	30.2	42.9	36.5	46.3	0.0	0.0	0.0
LS Yuba City CA MSA	519	16,530	0.2	3,417	0.6	0.8	0.8	32.7	30.1	22.5	31.0	29.5	33.6	35.7	39.9	43.1	0.0	0.0	0.0
LS California Non-MSA	2,736	66,017	0.9	13,672	0.7	0.2	0.5	15.6	12.0	14.1	55.6	55.2	54.3	28.1	32.6	31.1	0.0	0.0	0.0
Total	304,675	8,056,909	100.0	1,334,850	6.4	6.8	5.1	19.7	21.1	17.8	33.2	32.6	32.8	40.2	39.1	43.8	0.5	0.4	0.4

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data: 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is adequate. The distribution is good in the Fresno, CA MSA, excellent in the Los Angeles-Long Beach-Anaheim, CA MSA, good in the Riverside-San Bernardino-Ontario, CA MSA, and poor in the San Francisco-Oakland-Hayward, CA MSA.

Fresno, CA MSA

The geographic distribution of small loans to farms in the Fresno, CA MSA is good, based on good performance in low-income geographies and good performance in moderate-income geographies. The geographic distribution in low-income geographies at 4 percent is lower than the 4.8 percent of farms in low-income geographies and it is lower than the 4.4 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 27.9 percent is lower than the 29.6 percent of farms in moderate-income geographies and it is lower than the 30.5 percent for aggregate lenders.

Los Angeles-Long Beach-Anaheim, CA MSA

The geographic distribution of small loans to farms in the Los Angeles-Long Beach-Anaheim, CA MSA is excellent, based on adequate performance in low-income geographies and excellent performance in moderate-income geographies. The geographic distribution in low-income geographies at 2.6 percent is lower than the 3.7 percent of farms in low-income geographies and it is lower than the 3.5 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 17.9 percent is lower than the 19.4 percent of farms in moderate-income geographies; however, it exceeds the 17.7 percent for aggregate lenders.

Riverside-San Bernardino-Ontario, CA MSA

The geographic distribution of small loans to farms in the Riverside-San Bernardino-Ontario, CA MSA is good, based on good performance in low-income geographies and good performance in moderate-income geographies. The geographic distribution in low-income geographies at 4.8 percent is greater than the 3.9 percent of farms in low-income geographies; however, it is lower than the 5.4 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 20.4 percent is lower than the 22.9 percent of farms in moderate-income geographies and it is slightly lower than the 20.5 percent for aggregate lenders.

San Francisco-Oakland-Hayward, CA MSA

The geographic distribution of small loans to farms in the San Francisco-Oakland-Hayward, CA MSA is poor, based on poor performance in low-income geographies and poor performance in moderate-income geographies. The geographic distribution in low-income geographies at 2.5 percent is lower than the 6.6 percent of farms in low-income geographies

and it is lower than the 4.2 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 3.5 percent is significantly lower than the 15.7 percent of farms in moderate-income geographies and it is lower than the 8.5 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Fresno CA MSA	301	22,662	11.3	545	4.8	4.0	4.4	29.6	27.9	30.5	34.1	40.9	37.6	31.5	27.2	27.5	0.0	0.0	0.0
FS Los Angeles-Long Beach-Anaheim CA MSA	195	4,297	7.6	458	3.7	2.6	3.5	19.4	17.9	17.7	29.0	24.1	29.5	47.4	53.3	48.5	0.6	2.9	0.9
FS Riverside-San Bernardino-Ontario CA MSA	167	3,825	6.3	298	3.9	4.8	5.4	22.9	20.4	20.5	35.6	29.3	28.5	37.7	45.5	45.6	0.0	0.0	0.0
FS San Francisco-Oakland-Hayward CA MSA	113	1,627	4.5	260	6.6	2.5	4.2	15.7	3.5	8.5	38.4	49.6	36.5	39.3	45.1	50.8	0.0	0.0	0.0
LS Bakersfield CA MSA	127	4,977	4.8	253	1.2	0.0	0.4	28.5	30.7	34.4	29.8	24.4	28.5	40.4	44.9	36.8	0.0	0.0	0.0
LS Chico CA MSA	34	916	1.4	170	0.4	7.7	0.6	21.4	20.6	14.1	36.1	32.4	40.0	42.1	44.1	45.3	0.0	0.0	0.0
LS El Centro CA MSA	20	235	0.8	115	0.0	0.0	0.0	19.3	30.0	15.7	40.6	50.0	40.0	40.0	20.0	44.3	0.0	0.0	0.0
LS Hanford-Corcoran CA MSA	28	1,194	1.1	139	0.0	0.0	0.0	20.5	10.0	11.5	42.0	53.6	38.8	37.4	39.3	49.6	0.1	0.0	0.0
LS Madera CA MSA	105	7,023	3.9	180	0.0	0.0	0.0	16.6	16.2	14.4	69.6	69.5	67.8	13.8	14.3	17.8	0.0	0.0	0.0
LS Merced CA MSA	110	5,519	4.1	376	0.3	0.0	0.0	17.0	19.1	15.2	52.8	51.8	59.6	29.9	29.1	25.3	0.0	0.0	0.0
LS Modesto CA MSA	105	3,096	4.3	470	0.8	2.7	0.6	8.2	4.8	5.5	51.4	54.3	56.2	39.7	40.0	37.7	0.0	0.0	0.0
LS Napa CA MSA	40	1,904	1.5	98	0.0	0.0	0.0	15.1	17.5	13.3	32.3	37.5	32.7	52.5	45.0	54.1	0.1	0.0	0.0
LS Oxnard-Thousand Oaks-Ventura CA MSA	112	3,218	4.2	206	5.9	8.9	9.7	24.9	23.2	23.3	44.6	43.8	45.6	24.6	24.1	21.4	0.0	0.0	0.0
LS Redding CA MSA	16	267	0.7	51	0.0	0.0	0.0	23.5	43.8	41.2	52.7	50.0	41.2	23.7	18.8	17.6	0.0	0.0	0.0
LS Sacramento-Roseville-Arden-Arcade CA MSA	149	2,118	5.8	438	3.7	4.3	1.4	16.3	13.7	10.0	46.4	47.7	50.0	33.6	41.6	38.6	0.0	0.0	0.0
LS Salinas CA MSA	89	2,525	3.3	169	0.6	0.0	1.2	15.1	11.2	20.1	43.1	36.0	45.6	40.8	52.8	32.5	0.4	0.0	0.6
LS Santa Maria-Santa Barbara CA MSA	50	690	2.2	164	6.4	18.0	8.5	16.4	15.2	17.1	24.1	24.0	38.4	52.8	46.0	36.0	0.2	5.0	0.0
LS Santa Cruz-Watsonville CA MSA	35	687	1.3	93	1.6	0.0	1.1	27.8	34.3	49.5	38.2	34.3	32.3	32.3	31.4	17.2	0.0	0.0	0.0
LS San Diego-Carlsbad CA MSA	114	2,422	4.3	282	3.9	0.0	0.7	16.2	15.8	12.1	38.8	26.3	36.2	41.1	57.9	50.7	0.0	0.0	0.4
LS San Jose-Sunnyvale-Santa Clara CA MSA	81	3,535	3.0	152	6.6	0.0	2.0	25.3	29.6	30.9	36.3	35.8	34.2	31.6	34.6	32.9	0.1	0.0	0.0
LS San Luis-Obispo-Paso Robles-Arroyo CA MSA	83	2,943	3.1	230	0.4	0.0	0.9	5.9	4.2	3.9	64.4	60.2	64.3	29.3	38.6	30.9	0.0	0.0	0.0
LS Santa Rosa CA MSA	90	2,920	3.4	213	0.9	0.0	0.5	12.5	6.8	8.5	55.7	51.1	58.2	30.8	44.4	32.9	0.0	0.0	0.0
LS Stockton-Lodi MSA	116	5,477	4.4	524	4.6	10.3	5.5	12.0	6.0	7.4	31.5	31.9	30.5	51.9	51.7	56.5	0.0	0.0	0.0
LS Vallejo-Fairfield CA MSA	17	255	0.6	53	0.5	0.0	0.0	11.4	0.0	1.9	56.0	41.2	67.9	32.1	58.8	30.2	0.0	0.0	0.0
LS Visalia-Porterville CA MSA	184	12,412	6.9	435	2.5	4.3	3.4	25.1	33.2	27.4	42.1	45.1	42.3	30.3	17.4	26.9	0.0	0.0	0.0
LS Yuba City CA MSA	68	3,067	2.6	204	0.2	0.0	0.0	6.9	4.8	3.4	37.3	30.9	36.8	55.7	67.6	59.8	0.0	0.0	0.0
LS California Non-MSA	111	2,474	4.2	216	0.2	0.0	0.5	13.4	12.6	12.0	58.8	67.6	65.7	27.6	19.8	21.8	0.0	0.0	0.0
Total	2,660	102,285	100.0	6,792	3.3	2.6	2.5	18.6	17.5	16.5	39.6	41.5	43.1	38.4	38.2	37.9	0.1	0.3	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is adequate. The distribution is good in the Fresno, CA MSA, adequate in the Los Angeles-Long Beach-Anaheim, CA MSA, good in the Riverside-San Bernardino-Ontario, CA MSA, and adequate in the San Francisco-Oakland-Hayward, CA MSA.

Fresno, CA MSA

The distribution of home mortgage loans by borrower income in the Fresno, CA MSA is good. The distribution is adequate to low-income borrowers and it is good to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 7 percent is significantly lower than the 24.7 percent of low-income families in the MSA; however, the bank’s performance is higher than the 1.7 percent for aggregate lenders. Examiners applied more weight to the bank’s performance relative to aggregate lenders due to the high cost of housing. The proportion of home mortgage loans to moderate-income borrowers at 11.5 percent is lower than the 16 percent of moderate-income families; however, it exceeds the 7.4 percent performance for aggregate lenders.

Los Angeles-Long Beach-Anaheim, CA MSA

The distribution of home mortgage loans by borrower income in the Los Angeles-Long Beach-Anaheim, CA MSA is adequate. The distribution is adequate to low-income borrowers and it is adequate to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 4.5 percent is significantly lower than the 23.6 percent of low-income families in the MSA; however, the bank’s performance is higher than the 1.7 percent for aggregate lenders. Examiners applied more weight to the bank’s performance relative to aggregate lenders due to the high cost of housing. The proportion of home mortgage loans to

moderate-income borrowers at 8 percent is lower than the 16.6 percent of moderate-income families; however, it exceeds the 6 percent performance for aggregate lenders.

Riverside-San Bernardino-Ontario, CA MSA

The distribution of home mortgage loans by borrower income in the Riverside-San Bernardino-Ontario, CA MSA is good. The distribution is adequate to low-income borrowers and it is good to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 6.6 percent is significantly lower than the 21.8 percent of low-income families in the MSA; however, the bank's performance exceeds the 2.2 percent for aggregate lenders. Examiners applied more weight to the bank's performance relative to aggregate lenders due to the high cost of housing. The proportion of home mortgage loans to moderate-income borrowers at 15.3 percent is lower than the 17.5 percent of moderate-income families; however, it exceeds the 9.5 percent performance for aggregate lenders.

San Francisco-Oakland-Hayward, CA MSA

The distribution of home mortgage loans by borrower income in the San Francisco-Oakland-Hayward, CA MSA is adequate. The distribution is adequate to low-income borrowers and it is poor to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 4.4 percent is significantly lower than the 23.4 percent of low-income families in the MSA; however, the bank's performance exceeds the 2.6 percent for aggregate lenders. Examiners applied more weight to the bank's performance relative to aggregate lenders due to the high cost of housing. The proportion of home mortgage loans to moderate-income borrowers at 8.4 percent is lower than the 16.4 percent of moderate-income families and it is lower than the 9.7 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Fresno CA MSA	1,710	293,147	1.3	26,733	24.7	7.0	1.7	16.0	11.5	7.4	17.1	20.3	16.6	42.1	53.6	51.3	0.0	7.7	22.9
FS Los Angeles-Long Beach-Anaheim CA MSA	46,266	25,709,874	34.5	418,285	23.6	4.5	1.7	16.6	8.0	6.0	18.1	13.6	15.2	41.7	67.9	62.6	0.0	6.0	14.7
FS Riverside-San Bernardino-Ontario CA MSA	13,186	3,167,890	9.8	192,442	21.8	6.6	2.2	17.5	15.3	9.5	19.8	22.0	18.7	40.8	50.0	47.5	0.0	6.1	22.1
FS San Francisco-Oakland-Hayward CA MSA	23,716	14,491,507	17.7	192,850	23.4	4.4	2.6	16.4	8.4	9.7	18.9	14.0	18.6	41.4	68.8	57.5	0.0	4.4	11.7
LS Bakersfield CA MSA	1,984	294,664	1.5	26,180	23.0	8.6	2.6	17.2	15.3	9.5	18.0	23.3	17.3	41.8	45.4	45.8	0.0	7.3	24.9
LS California Non-MSA	1,482	339,128	1.1	19,179	19.4	7.8	2.5	17.4	11.7	9.5	19.9	16.2	18.2	43.3	58.4	53.9	0.0	5.9	16.0
LS Chico CA MSA	577	115,407	0.4	7,290	22.1	8.8	3.3	17.2	13.0	12.0	19.4	21.0	19.8	41.4	50.1	50.3	0.0	7.1	14.5
LS El Centro CA MSA	273	34,215	0.2	4,244	24.4	8.4	1.8	17.0	9.5	8.0	16.4	17.9	17.8	42.1	56.0	47.1	0.0	8.1	25.2
LS Hanford-Corcoran CA MSA	248	38,954	0.2	4,202	22.4	10.9	1.2	18.5	15.7	5.8	18.9	21.4	14.9	40.2	42.3	46.7	0.0	9.7	31.4
LS Madera CA MSA	294	43,002	0.2	4,430	20.5	7.1	1.5	18.9	19.0	8.1	20.7	23.1	17.7	40.0	43.2	49.2	0.0	7.5	23.5
LS Merced CA MSA	538	76,840	0.4	7,762	24.8	6.1	1.2	16.5	17.3	7.0	17.2	23.4	17.7	41.5	45.9	53.3	0.0	7.2	20.8
LS Modesto CA MSA	1,414	224,288	1.1	20,762	22.6	7.4	2.3	16.7	17.3	11.3	19.6	23.1	23.3	41.1	45.8	45.2	0.0	6.4	17.9
LS Napa CA MSA	584	279,866	0.4	5,798	21.9	5.8	2.7	16.7	9.6	8.5	20.3	17.6	19.5	41.1	59.6	57.6	0.0	7.4	11.6
LS Oxnard-Thousand Oaks-Ventura CA MSA	3,300	1,387,881	2.5	36,739	21.4	7.0	2.8	17.4	12.7	10.7	20.5	18.0	22.9	40.7	51.1	48.7	0.0	11.2	14.9
LS Redding CA MSA	366	62,661	0.3	7,072	22.7	9.3	2.1	18.0	14.5	8.9	19.1	18.9	19.0	40.2	48.1	47.0	0.0	9.3	23.0
LS Sacramento-Roseville-Arden-Arcade CA MSA	6,760	1,826,771	5.0	113,622	22.0	7.5	2.5	17.0	15.1	11.0	20.0	19.4	20.2	41.0	51.1	49.6	0.0	6.9	16.8
LS Salinas CA MSA	1,265	517,944	0.9	11,762	21.8	5.5	1.3	16.7	10.5	5.8	19.5	18.1	16.8	42.0	58.9	60.9	0.0	7.0	15.1
LS San Diego-Carlsbad CA MSA	10,226	4,919,229	7.6	141,802	22.4	4.6	1.5	17.6	8.5	6.3	18.7	14.4	17.5	41.3	66.9	55.9	0.0	5.5	18.8
LS San Jose-Sunnyvale-Santa Clara CA MSA	11,341	7,702,569	8.5	80,390	23.7	3.4	2.2	16.3	7.0	8.6	19.5	13.2	19.1	40.5	73.9	60.7	0.0	2.5	9.3
LS San Luis-Obispo-Paso Robles-Arroyo CA MSA	634	216,963	0.5	12,838	19.8	7.4	2.4	18.2	11.8	8.2	21.6	16.6	20.8	40.4	57.9	55.5	0.0	6.3	13.1
LS Santa Cruz-Watsonville CA MSA	759	351,882	0.6	10,024	23.9	5.8	2.2	16.9	9.4	8.5	18.3	13.4	18.2	40.9	66.3	60.4	0.0	5.1	10.6
LS Santa Maria-Santa Barbara CA MSA	1,022	685,263	0.8	13,960	21.7	6.7	2.8	17.8	11.3	10.6	18.6	13.3	19.2	41.9	60.8	51.6	0.0	8.0	15.8
LS Santa Rosa CA MSA	1,500	589,235	1.1	20,967	20.1	6.0	2.0	18.5	10.9	8.8	20.8	17.3	20.8	40.6	58.9	56.8	0.0	6.9	11.7
LS Stockton-Lodi MSA	1,802	350,677	1.3	29,040	22.0	6.4	1.8	17.7	15.0	8.0	19.1	24.5	19.4	41.1	48.0	53.0	0.0	6.0	17.6
LS Vallejo-Fairfield CA MSA	1,428	338,703	1.1	22,460	19.9	7.1	2.7	17.7	17.5	12.5	22.6	25.4	23.4	39.8	42.2	40.3	0.0	7.8	21.1
LS Visalia-Porterville CA MSA	962	125,909	0.7	12,554	22.8	7.7	1.1	17.6	13.1	6.1	17.8	18.9	14.1	41.8	50.6	51.2	0.0	9.7	27.5
LS Yuba City CA MSA	358	55,749	0.3	6,426	21.4	10.3	2.1	17.3	15.4	10.6	20.3	22.1	22.1	41.0	43.6	42.2	0.0	8.7	23.1
Total	133,995	64,240,218	100.0	1,449,813	22.8	5.2	2.0	16.9	10.0	8.2	18.9	15.9	17.9	41.4	63.2	55.5	0.0	5.8	16.3

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 29 percent of its small loans to businesses. The distribution is good in the Fresno, CA MSA, Los Angeles-Long Beach-Anaheim, CA MSA, Riverside-San Bernardino-Ontario, CA MSA, and San Francisco-Oakland-Hayward, CA MSA.

Fresno, CA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Fresno, CA MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 53.5 percent is lower than the 77.4 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is stronger than the 38.2 percent for aggregate lenders, overall performance is good.

Los Angeles-Long Beach-Anaheim, CA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Los Angeles-Long Beach-Anaheim, CA MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 60.1 percent is lower than the 79 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 44.4 percent for aggregate lenders, overall performance is good.

Riverside-San Bernardino-Ontario, CA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Riverside-San Bernardino-Ontario, CA MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 61.8 percent is lower than the 79.6 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 44.2 percent for aggregate lenders, overall performance is good.

San Francisco-Oakland-Hayward, CA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the San Francisco-Oakland-Hayward, CA MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 58.6 percent is lower than the 78.6 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 38.8 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Fresno CA MSA	4,047	128,831	1.3	22,850	77.4	53.5	38.2	5.2	14.9	17.5	31.6
FS Los Angeles-Long Beach-Anaheim CA MSA	138,838	3,730,150	45.6	523,485	79.0	60.1	44.4	5.6	11.2	15.4	28.7
FS Riverside-San Bernardino-Ontario CA MSA	26,338	642,812	8.6	111,947	79.6	61.8	44.2	4.5	11.7	15.9	26.5
FS San Francisco-Oakland-Hayward CA MSA	45,514	1,248,717	14.9	193,503	78.6	58.6	38.8	5.6	10.4	15.8	31.0
LS Bakersfield CA MSA	3,285	73,785	1.1	18,274	78.2	56.9	39.5	4.5	12.5	17.3	30.6
LS Chico CA MSA	694	13,166	0.2	12,377	80.4	51.6	27.7	4.1	10.4	15.6	38.0
LS El Centro CA MSA	416	8,451	0.1	2,660	71.0	56.3	44.1	5.3	16.6	23.6	27.2
LS Hanford-Corcoran CA MSA	360	10,708	0.1	2,010	75.4	61.1	42.8	4.5	8.1	20.1	30.8
LS Madera CA MSA	513	12,691	0.2	3,301	79.8	55.2	43.7	4.2	14.6	16.1	30.2
LS Merced CA MSA	718	16,709	0.2	5,097	77.2	55.4	40.9	4.3	11.4	18.6	33.1
LS Modesto CA MSA	1,890	48,337	0.6	12,465	78.6	56.9	42.4	5.0	10.8	16.5	32.3
LS Napa CA MSA	1,087	30,688	0.4	5,250	80.2	52.1	41.2	5.4	12.1	14.3	35.9
LS Oxnard-Thousand Oaks-Ventura CA MSA	6,497	161,299	2.1	32,805	80.3	59.8	40.9	4.8	9.9	14.9	30.3
LS Redding CA MSA	677	17,324	0.2	5,845	80.3	53.2	36.5	4.5	12.7	15.3	34.1
LS Sacramento-Roseville-Arden-Arcade CA MSA	12,889	335,693	4.2	68,359	79.7	59.7	40.8	4.2	12.1	16.1	28.1
LS Salinas CA MSA	1,806	53,207	0.6	9,770	79.1	53.0	44.2	4.7	15.3	16.3	31.7
LS Santa Maria-Santa Barbara CA MSA	2,247	60,693	0.7	13,631	78.6	52.1	40.1	5.3	13.2	16.1	34.7
LS Santa Cruz-Watsonville CA MSA	1,900	35,550	0.6	10,597	82.6	55.5	39.1	4.2	11.9	13.2	32.6
LS San Diego-Carlsbad CA MSA	21,427	602,372	7.0	123,509	79.9	59.0	42.1	4.6	11.5	15.5	29.5
LS San Jose-Sunnyvale-Santa Clara CA MSA	19,317	458,203	6.3	73,140	78.2	61.4	39.6	5.6	9.9	16.1	28.7
LS San Luis-Obispo-Paso Robles-Arroyo CA MSA	1,505	43,451	0.5	12,602	81.4	52.2	38.1	4.1	12.8	14.5	35.0
LS Santa Rosa CA MSA	3,034	89,510	1.0	19,124	81.0	52.6	40.3	4.7	12.1	14.3	35.3
LS Stockton-Lodi MSA	3,053	65,376	1.0	16,044	77.2	61.2	44.1	5.0	10.9	17.9	27.9
LS Vallejo-Fairfield CA MSA	1,642	38,088	0.5	9,738	79.7	58.5	38.9	3.8	12.0	16.5	29.5
LS Visalia-Porterville CA MSA	1,726	48,551	0.6	9,378	77.4	61.0	39.1	5.1	9.4	17.5	29.6
LS Yuba City CA MSA	519	16,530	0.2	3,417	78.6	58.6	40.1	3.7	10.4	17.6	31.0
LS California Non-MSA	2,736	66,017	0.9	13,672	80.8	51.5	41.7	3.8	8.8	15.4	39.7
Total	304,675	8,056,909	100.0	1,334,850	79.2	59.4	42.1	5.1	11.2	15.7	29.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 35 percent of its small loans to farms. The distribution is poor in the Fresno, CA MSA, good in the Los Angeles-Long Beach-Anaheim, CA MSA, and adequate in the Riverside-San Bernardino-Ontario, CA MSA and San Francisco-Oakland-Hayward, CA MSA.

Fresno, CA MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Fresno, CA MSA is poor. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 41.5 percent is significantly lower than the 90.6 percent of farms with

gross annual revenues of \$1 million or less. The bank's distribution is lower than the 49.7 percent for aggregate lenders.

Los Angeles-Long Beach-Anaheim, CA MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Los Angeles-Long Beach-Anaheim, CA MSA is good. Based on farms with known revenues, the proportion of the bank's small loans to farms at 57.4 percent is lower than the 93.4 percent of farms with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 40.2 percent for aggregate lenders, overall performance is good.

Riverside-San Bernardino-Ontario, CA MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Riverside-San Bernardino-Ontario, CA MSA is adequate. Based on farms with known revenues, the proportion of the bank's small loans to farms at 53.9 percent is lower than the 93.5 percent of farms with gross annual revenues of \$1 million or less. Considering the bank's distribution exceeds the 50 percent for aggregate lenders, overall performance is adequate.

San Francisco-Oakland-Hayward, CA MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the San Francisco-Oakland-Hayward, CA MSA is adequate. Based on farms with known revenues, the proportion of the bank's small loans to farms at 52.2 percent is lower than the 94.4 percent of farms with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 48.1 percent for aggregate lenders, overall performance is adequate.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms w/ Revenues <= 1MM			Farms w/ Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Fresno CA MSA	301	22,662	11.3	545	90.6	41.5	49.7	7.5	17.9	1.9	40.5
FS Los Angeles-Long Beach-Anaheim CA MSA	195	4,297	7.6	458	93.4	57.4	40.2	4.2	13.3	2.4	29.2
FS Riverside-San Bernardino-Ontario CA MSA	167	3,825	6.3	298	93.5	53.9	50.0	4.5	16.8	2.0	29.3
FS San Francisco-Oakland-Hayward CA MSA	113	1,627	4.2	260	94.4	52.2	48.1	3.9	12.4	1.7	35.4
LS Bakersfield CA MSA	127	4,977	5.5	253	87.7	36.2	39.5	9.2	26.8	3.1	37.0
LS Chico CA MSA	34	916	1.5	170	95.0	35.3	61.2	4.2	14.3	0.8	55.9
LS El Centro CA MSA	20	235	0.8	115	78.5	20.0	42.6	18.7	50.0	2.7	30.0
LS Hanford-Corcoran CA MSA	28	1,194	1.1	139	88.6	50.0	42.4	9.4	28.6	2.0	21.4
LS Madera CA MSA	105	7,023	3.9	180	91.2	38.1	48.3	7.6	27.6	1.2	34.3
LS Merced CA MSA	110	5,519	4.1	376	89.4	40.0	42.0	9.1	16.4	1.5	43.6
LS Modesto CA MSA	105	3,096	4.1	470	91.9	42.9	51.9	6.1	28.6	2.0	28.6
LS Napa CA MSA	40	1,904	1.5	98	92.1	37.5	43.9	6.8	27.5	1.1	35.0
LS Oxnard-Thousand Oaks-Ventura CA MSA	112	3,218	4.4	206	90.4	49.1	41.7	6.8	26.8	2.8	24.1
LS Redding CA MSA	16	267	0.7	51	95.4	56.3	47.1	1.9	0.0	2.6	58.3
LS Sacramento-Roseville-Arden-Arcade CA MSA	149	2,118	5.6	438	94.7	49.7	59.4	3.3	7.4	2.0	43.0
LS Salinas CA MSA	89	2,525	4.1	169	83.3	29.2	44.4	12.9	30.3	3.8	40.4
LS Santa Maria-Santa Barbara CA MSA	50	690	2.0	164	89.8	46.0	50.0	7.6	10.0	2.6	44.0
LS Santa Cruz-Watsonville CA MSA	35	687	1.3	93	92.4	48.6	44.1	6.1	17.1	1.5	34.3
LS San Diego-Carlsbad CA MSA	114	2,422	4.7	282	94.6	69.3	56.7	3.8	7.0	1.6	23.7
LS San Jose-Sunnyvale-Santa Clara CA MSA	81	3,535	3.2	152	93.2	53.1	54.6	4.5	17.3	2.3	29.6
LS San Luis-Obispo-Paso Robles-Arroyo CA MSA	83	2,943	3.1	230	95.5	45.8	50.4	3.3	14.5	1.2	39.8
LS Santa Rosa CA MSA	90	2,920	4.0	213	94.4	47.8	49.8	3.7	14.4	1.9	37.8
LS Stockton-Lodi MSA	116	5,477	4.4	524	91.8	34.5	45.8	6.8	26.7	1.4	38.8
LS Vallejo-Fairfield CA MSA	17	255	0.6	53	95.1	52.9	54.7	3.7	20.0	1.2	41.2
LS Visalia-Porterville CA MSA	184	12,412	6.9	435	88.2	46.7	47.8	9.8	25.5	2.0	27.7
LS Yuba City CA MSA	68	3,067	2.6	204	93.0	48.5	60.3	5.6	16.2	1.5	35.3
LS California Non-MSA	111	2,474	5.6	216	95.7	45.0	59.3	2.4	8.6	1.8	48.6
Total	2,660	102,285	100.0	6,792	92.6	46.3	49.1	5.4	18.3	2.0	35.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a positive effect overall on the bank’s Lending Test performance in the state of California.

Fresno, CA MSA

In the Fresno, CA MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated six CD loans totaling \$4.9 million that helped provide 217 units of affordable housing. CD lending represents approximately 1.8 percent of the allocated Tier 1 Capital. The bank met the community’s needs primarily through retail lending.

Los Angeles-Long Beach-Anaheim, CA MSA

In the Los Angeles-Long Beach-Anaheim, CA MSA, CD lending has a significantly positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated 257 CD loans totaling more than \$1.1 billion that primarily helped provide

3,552 units of affordable housing. CD lending represents 10 percent of the allocated Tier 1 Capital.

Examples of CD loans include:

- The bank provided \$28 million in construction financing to develop Alegre Apartments, a 104-unit affordable multifamily housing project in Irvine, CA. All units except one reserved for the onsite property manager are restricted to incomes at or below 50 percent of the area median income. Bank of America also provided the LIHTC investment for this project.
- The bank provided \$27.3 million in construction financing to develop Depot at Santiago, a 70-unit affordable multifamily housing project in Santa Ana, CA. All units except one reserved for the onsite property manager are restricted to incomes at or below 60 percent of the area median income. Bank of America also provided the LIHTC investment for this project.
- The bank provided \$19.6 million in construction financing to construct Courson East Arts Colony, an 81-unit affordable housing development in Palmdale, CA. All units except one reserved for the onsite property manager are restricted to incomes at or below 50 percent of the area median income. Bank of America also provided the LIHTC investment for this project.

Riverside-San Bernardino-Ontario, CA MSA

In the Riverside-San Bernardino-Ontario, CA MSA, CD lending has a significantly positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated 38 CD loans totaling \$124.3 million that primarily helped provide 864 units of affordable housing. CD lending represents 10.1 percent of the allocated Tier 1 Capital.

Examples of CD loans include:

- The bank provided \$10.2 million in construction financing to develop Citrus Circle Apartments, a 61-unit affordable multifamily housing project in Corona, CA. All units except one reserved for the onsite property manager are restricted to incomes at or below 60 percent of the area median income. Bank of America also provided the LIHTC investment for this project. This loan is responsive to identified needs as demand for affordable housing in Corona, CA far exceeds the supply.
- The bank provided \$28 million in tax-exempt construction financing to develop Ivy at College Park II Apartments, a 200-unit affordable housing development in Chino, CA. All units except two that are reserved for onsite property managers are restricted to incomes at or below 60 percent of the area median income. Bank of America also provided a taxable construction loan for this project.

- The bank provided a \$10.2 million construction loan to develop Citrus Circle Apartments, a 61-unit affordable housing development in Corona, CA. The project includes 14 one-bedroom, 28 two-bedroom, and 18 three-bedroom units to help address the housing needs of larger families. All units except one reserved for the onsite property manager are restricted to incomes at or below 60 percent of the area median income. Bank of America also provided a LIHTC equity investment toward this project.

San Francisco-Oakland-Hayward, CA MSA

In the San Francisco-Oakland-Hayward, CA MSA, CD lending has a positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated 116 CD loans totaling more than \$1.1 billion that primarily helped provide 3,007 units of affordable housing. CD lending represents 9.3 percent of the allocated Tier 1 Capital, after considering approximately \$18 billion in deposits from national corporations in which the deposits did not derive from the local community.

Examples of CD loans include:

- The bank provided \$19.5 million in construction financing to develop 1100 Ocean Avenue Apartments, a 71-unit affordable housing development serving very low-income families in San Francisco. All units except the onsite manager's unit are restricted to incomes at or below 50 percent of the area median income. Bank of America also provided a LIHTC equity investment in the project's development.
- The bank provided \$20.7 million in construction financing for the substantial rehabilitation of 1880 Pine Apartments, a 113-unit existing affordable housing development for seniors (62+) in San Francisco. All units except the onsite property manager's unit are restricted to incomes at or below 50 percent of the area median income. Bank of America also provided a LIHTC equity investment and a standby letter of credit to support the development.
- The bank provided \$19.1 million in construction financing for the rehabilitation of Alemany Apartments, a 150-unit existing affordable housing development in San Francisco. The development includes 139 units restricted to incomes at or below 50 percent of the area median income. The bank also provided a LIHTC equity investment along with a standby letter of credit in support of the development.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of California, lending under the MHA and HARP programs accounted for 89 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance varied across the limited-scope assessment areas. Performance in the Bakersfield, CA MSA, Merced, CA MSA, Modesto, CA MSA, Oxnard-Thousand Oaks-Ventura, CA MSA, Sacramento-Roseville-Arden-Arcade, CA MSA, Salinas, CA MSA, San Diego-Carlsbad, CA MSA, San Jose-Sunnyvale-Santa Clara, CA MSA, San Luis-Obispo-Paso Robles-Arroyo, CA MSA, Santa Maria-Santa Barbara, CA MSA, Santa Rosa, CA MSA, Stockton-Lodi, CA MSA, and Visalia-Porterville, CA MSA is consistent with the Outstanding Lending Test performance in the state of California. Performance in the Chico, CA MSA, El Centro, CA MSA, Hanford-Corcoran, CA MSA, Madera, CA MSA, Napa, CA MSA, Redding, CA MSA, Santa Cruz-Watsonville, CA MSA, Vallejo-Fairfield, CA MSA, Yuba City, CA MSA, and California Non-MSA is good and it is weaker than the overall Outstanding Lending Test performance in the state of California primarily due to weaker geographic distributions and relatively lower levels of CD lending.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of California is rated Outstanding. Investment performance is excellent in the Fresno, CA MSA, Los Angeles-Long Beach-Ontario MSA, Riverside-San Bernardino-Ontario, CA MSA, and San Francisco-Oakland-Hayward, CA MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Fresno, CA MSA

In the Fresno, CA MSA, Bank of America has an excellent level of CD investments. The bank made 81 CD investments during the evaluation period totaling \$32.8 million. Approximately \$32.8 million or 96 percent of the current period investment dollars supported 243 units of affordable housing. In addition, the bank has 18 CD investments totaling \$3.1 million it made during a prior evaluation period that are still outstanding and continuing to provide benefit to the community. Prior period and current period investments total \$35.8 million or 13 percent of allocated Tier 1 Capital. The majority of current period investments are either innovative or complex with LIHTCs representing approximately \$23 million or 70 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$6.2 million in a Section 42 LIHTC fund that invests in a portfolio of four LIHTC projects in multiple assessment areas. One of the projects, comprising two sites located in the Fresno, CA MSA, will provide 44 units of affordable housing. All units are restricted to incomes at or below 60 percent of the area median income. The investment amount represents just the portion allocated to the Fresno, CA MSA.

- The bank invested \$16.7 million in a Section 42 LIHTC fund that invests in a portfolio of six LIHTC projects in multiple assessment areas. Two of the projects are located in the Fresno, CA MSA and provide 77 units of affordable housing to seniors aged 55 and older. All units are restricted to incomes at or below 60 percent of the area median income. This investment amount represents just the portion allocated to the Fresno, CA MSA.
- The bank provided \$500,000 in grants to the Northern California Community Loan Fund (NCCLF), a certified CDFI and CDE that supplies loan capital and financial training to organizations that develop affordable housing and community facilities, provide job-training programs, and vital human services throughout northern California. The grant money has helped NCCLF to preserve low-income housing and provide much needed services to low- and moderate-income individuals. Bank of America has invested \$3 million in the NCCLF. The bank allocated \$500,000 of the grants to the Fresno, CA MSA.

Los Angeles-Long Beach-Anaheim, CA MSA

In the Los Angeles-Long Beach-Anaheim, CA MSA, Bank of America has an excellent level of CD investments. The bank made 897 CD investments during the evaluation period totaling \$973.8 million. Approximately \$944.9 million or 97 percent of the current period investment dollars supported 6,214 units of affordable housing. In addition, the bank has 262 CD investments totaling \$270.8 million it made during a prior evaluation period that are still outstanding and continuing to provide benefit to the community. Prior period and current period investments total \$1.2 billion or 10.9 percent of allocated Tier 1 Capital. The majority of current period investments are either innovative or complex with LIHTCs representing approximately \$613.2 million or 63 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$17.3 million in a LIHTC to finance the construction of Crenshaw Villas, a 50-unit affordable housing development for senior aged 55 and over in Los Angeles, CA. All units except one reserved for the onsite property manager are restricted to incomes at or below 50 percent of the area median income.
- The bank invested \$9.2 million in a LIHTC to finance the construction of Day Street, a 46-unit supportive housing development in the City of Los Angeles. The developer set aside 37 units for the homeless. The remaining units are restricted to incomes at or below 40 percent of the area median income.
- The bank invested \$23.9 million in a LIHTC to finance the construction of Glendale Arts Colony Apartments, a 70-unit affordable housing development in Glendale, CA. All units except one reserved for the onsite property manager are restricted to incomes at or below 60 percent of the area median income.

Riverside-San Bernardino-Ontario, CA MSA

In the Riverside-San Bernardino-Ontario, CA MSA, Bank of America has an excellent level of CD investments. The bank made 114 CD investments during the evaluation period totaling \$114.9 million. Approximately \$111.6 million or 97 percent of the current period investment dollars supported 1,152 units of affordable housing. In addition, the bank has 53 CD investments totaling \$17.4 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$132.3 million or 10.7 percent of allocated Tier 1 Capital. The majority of current period investments are either innovative or complex with LIHTCs representing approximately \$109.7 million or 95 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$12.3 million in a LIHTC to finance the construction and rehabilitation of Citrus Circle Apartments, a 61-unit affordable housing development in Corona, CA. All units except one reserved for the onsite property manager are restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$8.1 million in a Section 42 LIHTC fund that invests in portfolio of five LIHTC projects in multiple assessment areas. One of the projects is Paseo de los Heroes, a 53-unit affordable housing development in Mecca, CA. The developer targeted the units to migrant farm workers, which receive U.S. Rural Development Section 521 Rental Assistance. Eligible applicants pay no more than 30 percent of income for housing. The investment amount represents just the portion allocated to the Riverside-San Bernardino-Ontario, CA MSA.
- The bank invested \$11.6 million in a Section 42 LIHTC fund that invests indirectly in qualifying LIHTC properties in multiple assessment areas. This investment amount represents Paseo Verde Phase II, a 46-unit affordable housing development in Fontana, CA. The development restricts all units to renters with incomes at or below 60 percent of the area median income.

San Francisco-Oakland-Hayward, CA MSA

In the San Francisco-Oakland-Hayward, CA MSA, Bank of America has an excellent level of CD investments. The bank made 895 CD investments during the evaluation period totaling \$1.6 billion. Approximately \$1.5 billion or 96 percent of the current period investment dollars supported 8,309 units of affordable housing. In addition, the bank has 351 CD investments totaling \$218.2 million it made during a prior evaluation period that are still outstanding and continuing to provide benefit to the community. Prior period and current period investments total \$1.8 billion or 14.9 percent of allocated Tier 1 Capital after considering approximately \$18 billion in deposits from national corporations in which the deposits did not derive from the local community. The majority of current period investments are either innovative or complex with LIHTCs and New Markets Tax Credits representing approximately \$1 billion or 63 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$11.6 million in a LIHTC to finance the rehabilitation of 227 Bay Street, a 61-unit affordable housing complex in the City of San Francisco for seniors and individuals with disabilities. All units except one reserved for the onsite property manager are restricted to incomes at or below 50 percent of the area median income.
- The bank invested \$19.7 million in a LIHTC to finance the rehabilitation of 255 Woodside Avenue, a 109-unit affordable housing complex in the City of San Francisco for seniors and individuals with disabilities. All units except one reserved for the onsite property manager are restricted to incomes at or below 50 percent of the area median income.
- The bank invested \$52.6 million in a LIHTC to finance the rehabilitation of Clementina Towers of 345, a 276-unit affordable housing complex in the City of San Francisco for seniors and individuals with disabilities. All units except two reserved for the onsite property managers are restricted to incomes at or below 50 percent of the area median income.

Table 14. Qualified Investments								2012-2016		
QUALIFIED INVESTMENTS		Geography: CALIFORNIA				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Fresno, CA	18	3,063	81	32,777	99	35,840	0.90	0	0	
Los Angeles, CA	262	270,797	897	973,808	1,159	1,244,605	31.10	31	177,898	
Riverside, CA	53	17,378	114	114,876	167	132,254	3.31	4	8,506	
San Francisco, CA	351	218,207	895	1,599,530	1,246	1,817,737	45.43	58	769,212	
Limited Review										
Bakersfield, CA	23	5,698	49	16,633	72	22,332	0.56	0	0	
Chico, CA	9	1,619	34	4,647	43	6,266	0.16	0	0	
El Centro, CA	14	3,470	14	1,135	28	4,605	0.12	0	0	
Hanford, CA	5	617	21	1,477	26	2,093	0.05	0	0	
Madera, CA	3	78	21	991	24	1,069	0.03	0	0	
Merced, CA	4	910	19	3,687	23	4,596	0.11	0	0	
Modesto, CA	10	533	37	8,711	47	9,245	0.23	0	0	
Napa, CA	5	917	49	4,142	54	5,059	0.13	2	639	
Oxnard, CA	22	17,899	49	42,403	71	60,303	1.51	4	3,600	
Redding, CA	8	738	23	3,911	31	4,649	0.12	1	204	
Sacramento, CA	41	35,155	181	71,411	222	106,565	2.66	6	3,538	
Salinas, CA	23	3,749	42	15,909	65	19,658	0.49	0	0	
San Diego, CA	72	46,534	154	125,472	226	172,006	4.30	3	1,554	
San Jose, CA	77	45,867	208	156,762	285	202,629	5.06	10	48,957	
San Luis Obispo, CA	10	2,224	41	9,231	51	11,455	0.29	1	131	
Santa Cruz, CA	7	326	40	8,726	47	9,052	0.23	0	0	
Santa Maria, CA	29	9,848	40	13,097	69	22,945	0.57	2	1,713	
Santa Rosa, CA	22	4,595	77	30,068	99	34,663	0.87	2	221	
Stockton, CA	9	590	47	16,008	56	16,598	0.41	0	0	
Vallejo, CA	10	1,926	75	11,422	85	13,348	0.33	0	0	
Visalia, CA	12	6,885	49	4,624	61	11,509	0.29	0	0	
Yuba City, CA	9	231	26	3,191	35	3,422	0.09	0	0	
California Non-MSA	11	4,298	40	5,505	51	9,803	0.24	0	0	
CALIFORNIA - Statewide	0	0	45	929	45	929	0.02	0	0	
CALIFORNIA - Non Assessed	19	3,293	56	12,851	75	16,145	0.40	0	0	
CALIFORNIA	1,138	707,446	3,424	3,293,934	4,562	4,001,380	100.00	124	1,016,173	

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance varied across the limited-scope assessment areas. Performance in the Bakersfield, CA MSA, El Centro, CA MSA, Hanford-Corcoran, CA MSA, Merced, CA MSA, Oxnard-Thousand Oaks-Ventura, CA MSA, Sacramento-Roseville-Arden-Arcade, CA MSA, Salinas, CA MSA, San Diego-Carlsbad, CA MSA, San Luis-Obispo-Paso Robles-Arroyo, CA MSA, Santa Maria-Santa Barbara, CA MSA, Santa Rosa, CA MSA, Vallejo-Fairfield, CA MSA, and Visalia-Porterville, CA MSA is consistent with the Outstanding Investment Test performance in the state of California. Performance in the Chico, CA MSA, Madera, CA MSA, Modesto, CA MSA, Napa, CA MSA, Redding, CA MSA, San Jose-Sunnyvale-Santa Clara, CA MSA, Santa Cruz-Watsonville, CA MSA, Stockton-Lodi, CA MSA, Yuba City, CA MSA, and California Non-MSA is weaker than the overall Outstanding Investment Test performance in the state of California. Performance is weaker primarily due to lower levels of investments relative to the bank's capacity in the assessment area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of California is rated Outstanding. Service Test performance is excellent in the Fresno, CA MSA, Los Angeles-Long Beach-Ontario MSA, Riverside-San Bernardino-Ontario, CA MSA, and San Francisco-Oakland-Hayward, CA MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Fresno, CA MSA

In the Fresno, CA MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 20 financial centers with the distribution of the population. The bank has two financial centers in low-income geographies representing 10 percent of its financial centers. Considering 10.9 percent of the population lives in low-income geographies, the distribution in low-income geographies is excellent. The bank has nine financial centers located in moderate-income geographies representing 45 percent of its financial centers. Considering 29.4 percent of the population lives in moderate-income geographies along with the added accessibility adjacent financial centers provide as described below, the distribution performance is excellent.

Examiners also considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies.

The bank has four financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to moderate-income census tracts. The adjacent financial centers help expand accessibility of service delivery systems in low- and moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank closed one financial center in a middle-income geography.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are more restrictive in moderate-income geographies. Financial centers are generally open 9:00 am to

5:00 pm Monday through Thursday and 9:00 am to 6:00 pm on Friday. Financial centers are generally open for Saturday banking 10:00 am to 2:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Fresno CA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	22	11.1	101,341	10.9	2	10.0	4	6.8	0	0.0	0	0.0
Moderate	56	28.1	273,918	29.4	9	45.0	29	49.2	0	0.0	0	0.0
Middle	51	25.6	257,097	27.6	5	25.0	15	25.4	0	0.0	1	100.0
Upper	68	34.2	291,166	31.3	4	20.0	11	18.6	0	0.0	0	0.0
NA	2	1.0	6,928	0.7	0	0.0	0	0.0	0	0.0	0	0.0
Totals	199	100.0	930,450	100.0	20	100.0	59	100.0	0	100.0	1	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Los Angeles-Long Beach-Anaheim, CA MSA

In the Los Angeles-Long Beach-Anaheim, CA MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 331 financial centers with the distribution of the population. In low-income geographies, the bank has 23 financial centers representing 6.9 percent of its financial centers. Considering 7.6 percent of the population lives in low-income geographies along with additional access provided by adjacent financial centers, financial center distribution in low-income geographies is excellent. The bank has 81 financial centers in moderate-income geographies representing 24.5 percent of its financial centers. Considering 29.5 percent of the population resides in moderate-income geographies along with the additional access provided with adjacent financial centers, financial center distribution is excellent.

Examiners also considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a neutral effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies.

The bank has 59 financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. Of the 59 financial centers, seven financial centers provide additional access to retail banking services in low-income geographies and 52 financial centers provide additional access in moderate-income geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened four financial centers and closed fourteen. The bank closed one financial center in a low-income geography, four financial centers in moderate-income geographies, one in an undefined census tract, and the remaining eight in middle- and upper-income geographies. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconvenience the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are more restrictive in moderate-income geographies. Financial centers are generally open 9:00 am to 6:00 pm Monday through Friday. Saturday banking is generally available 10:00 am to 2:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Los Angeles-Long Beach-Anaheim CA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	245	8.4	981,371	7.6	23	6.9	117	7.8	1	25.0	1	7.1
Moderate	825	28.2	3,785,321	29.5	81	24.5	406	26.9	0	0.0	4	28.6
Middle	819	28.0	3,721,999	29.0	89	26.9	424	28.1	1	25.0	5	35.7
Upper	999	34.1	4,301,605	33.5	135	40.8	539	35.7	2	50.0	3	21.4
NA	41	1.4	38,541	0.3	3	0.9	22	1.5	0	0.0	1	7.1
Totals	2,929	100.0	12,828,837	100.0	331	100.0	1,508	100.0	4	100.0	14	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Riverside-San Bernardino-Ontario, CA MSA

In the Riverside-San Bernardino-Ontario, CA MSA, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 89 financial centers with the distribution of the population. In low-income geographies, the bank has eight financial centers representing 9 percent of its financial centers. Considering 5.7 percent of the population lives in low-income geographies along with additional access provided by adjacent financial centers, financial center distribution in low-income geographies is excellent. The bank has 27 financial centers in moderate-income geographies representing 30.3 percent of its financial centers. Considering 26.4 percent of the population resides in moderate-income geographies along with the additional access provided with adjacent financial centers, financial center distribution is excellent.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The proportions of ADS usage by customers residing in low- and moderate-income geographies are near or exceed the proportion of individuals residing in low- and moderate-income geographies. This indicates a greater penetration of ADS usage in low- and moderate-income areas than in non-low- and moderate-income areas.

The bank has 18 financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. Of the 18 financial centers, two financial centers provide additional access to retail banking services in low-income geographies and 16 financial centers provide additional access in moderate-income geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened four financial

centers and closed eight. The bank closed one financial center in a moderate-income geography closed the remaining seven in middle- and upper-income geographies. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconvenience the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are more restrictive in moderate-income geographies. Financial centers are generally open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 2:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Riverside-San Bernardino-Ontario CA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	47	5.7	241,210	5.7	8	9.0	38	8.9	0	0.0	0	0.0
Moderate	232	28.2	1,117,386	26.4	27	30.3	143	33.4	0	0.0	1	12.5
Middle	295	35.9	1,496,838	35.4	21	23.6	112	26.2	1	25.0	4	50.0
Upper	243	29.6	1,355,762	32.1	33	37.1	135	31.5	3	75.0	3	37.5
NA	5	0.6	13,655	0.3	0	0.0	0	0.0	0	0.0	0	0.0
Totals	822	100.0	4,224,851	100.0	89	100.0	428	100.0	4	100.0	8	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

San Francisco-Oakland-Hayward, CA MSA

In the San Francisco-Oakland-Hayward, CA MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 141 financial centers with the distribution of the population. In low-income geographies, the bank has 17 financial centers representing 12.1 percent of its financial centers. Considering 11.5 percent of the population lives in low-income geographies along with additional access provided by adjacent financial centers, financial center distribution in low-income geographies is excellent. The bank has 29 financial centers in moderate-income geographies representing 20.6 percent of its financial centers. Considering 19.7 percent of the population resides in moderate-income geographies along with the additional access provided with adjacent financial centers, financial center distribution is excellent.

Examiners also considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. The proportions of ADS usage by customers residing in low- and moderate-income geographies are near or exceed the proportion of individuals residing in low- and moderate-income geographies. This indicates a greater penetration of ADS usage in low- and moderate-income areas than in non-low- and moderate-income areas.

The bank has 27 financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. Of the 27 financial centers, eight financial centers provide additional access to retail banking services in low-

income geographies and 19 financial centers provide additional access in moderate-income geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened three financial centers and closed eleven. The bank closed three financial centers in low-income geographies, two in moderate-income geographies, one in an undefined census tract, with the remaining five in middle- and upper-income geographies. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconvenience the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are more restrictive in moderate-income geographies. Financial centers are generally open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 10:00 am to 2:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS San Francisco-Oakland-Hayward CA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	120	12.3	496,464	11.5	17	12.1	68	13.0	1	33.3	3	27.3
Moderate	191	19.5	853,705	19.7	29	20.6	112	21.5	1	33.3	2	18.2
Middle	349	35.7	1,624,338	37.5	48	34.0	171	32.8	1	33.3	2	18.2
Upper	310	31.7	1,355,821	31.3	47	33.3	171	32.8	0	0.0	3	27.3
NA	8	0.8	5,063	0.1	0	0.0	0	0.0	0	0.0	1	9.1
Totals	978	100.0	4,335,391	100.0	141	100.0	522	100.0	3	100.0	11	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Fresno, CA MSA

The bank provides a limited level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 13 community development services targeted to low- and moderate-income individuals. Employees provided five financial education workshops for 109 individuals. Attendees to the financial education workshops were primarily elementary school students from low- and moderate-income families. Employees participated in four webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, four employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Los Angeles-Long Beach-Anaheim, CA MSA

The bank is a leader in providing community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 247 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 4 low- and moderate-income

individuals and provided 113 financial education and foreclosure prevention workshops for 3,579 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 79 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 51 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Riverside-San Bernardino-Ontario, CA MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 76 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to three low- and moderate-income individuals. Employees also provided 28 foreclosure prevention workshops for 1,470 individuals and 11 financial education workshops for 254 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 20 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 17 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

San Francisco-Oakland-Hayward, CA MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 207 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 4 low- and moderate-income individuals and provided 111 financial education, workforce, and foreclosure prevention workshops for 2,962 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 68 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 24 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance varied across the limited-scope assessment areas. Performance in the El Centro, CA MSA, Hanford-Corcoran, CA MSA, Madera, CA MSA, Merced, CA MSA, Napa, CA MSA, Redding, CA MSA, Sacramento-Roseville-Arden-Arcade, CA MSA, San Diego-Carlsbad, CA MSA, San Jose-Sunnyvale-Santa Clara, CA MSA, Santa Rosa, CA MSA, Stockton-Lodi, CA MSA, and Visalia-Porterville, CA MSA is consistent with the Outstanding Service Test performance in the state of California. Performance in the Bakersfield, CA MSA, Chico, CA MSA, Modesto, CA MSA, Oxnard-Thousand Oaks-Ventura, CA MSA, Salinas, CA MSA, San Luis-Obispo-Paso Robles-Arroyo, CA MSA, Santa Cruz-Watsonville, CA MSA, Santa Maria-Santa Barbara, CA MSA, Vallejo-Fairfield, CA MSA, Yuba City, CA MSA, and California Non-MSA is weaker than the overall Outstanding Service Test performance in the state of California primarily due to weaker financial center distribution.

State of Colorado

CRA Rating for Colorado¹⁸:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- High level of CD lending that has a significantly positive effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Reasonably accessible service delivery systems to low- and moderate-income geographies and individuals when considering the relatively high usage of alternative delivery systems that has a significantly positive effect on overall Service Test performance.

Description of Institution's Operations in Colorado

The state of Colorado is Bank of America's 35th largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$1.6 billion or 0.1 percent of its total domestic deposits in financial centers within the state of Colorado. Of the 138 depository financial centers operating in the state, Bank of America, with a deposit market share of 1.2 percent, is the 14th largest. Competitors with deposit market shares greater than 5 percent include Wells Fargo Bank (24.1 percent), FirstBank (11.1 percent), U.S. Bank (10.6 percent), and JP Morgan Chase Bank (9.2 percent). As of December 31, 2016, the bank operated 4 financial centers and 25 ATMs in Colorado.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Denver-Aurora-Lakewood, CO MSA, Bank of America reported an additional \$621 million in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the

¹⁸ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

Refer to the community profiles for the state of Colorado in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Colorado

The bank has defined three assessment areas. Examiners selected the Denver-Aurora-Lakewood, CO MSA for a full-scope review and the Boulder, CO MSA and Colorado Non-MSA for limited-scope reviews. While the Denver-Aurora-Lakewood, CO MSA carries approximately 99 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in Colorado, examiners based the conclusions and ratings for the state on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 15,026 home mortgage loans totaling \$4.2 billion, 6,568 small loans to businesses totaling \$264.8 million, and 50 small loans to farms totaling \$393 million. Based on loan volume, examiners weighted home mortgage loans, representing 69 percent of the volume, the most followed by small loans to business (30.4 percent), and small loans to farms (0.2 percent).

Examiners conducted a telephone interview with one local community services agency representing neighborhood housing, economic development, and community development financial institutions. The community contact noted that skilled trade laborers, workers with certifications, construction funding, public transportation, and affordable housing continue to be a concern across the state. The agencies request that financial institutions can help by offering start-up funding. A review of the bank's investments noted that the bank is active in the state in providing affordable housing assistance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Colorado is rated Outstanding, based on excellent lending activity, good geographic distribution, good borrower income distribution, and excellent CD lending that has a significantly positive effect on the Lending Test rating. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Colorado is excellent. Lending activity is excellent in the Denver-Aurora-Lakewood, CO MSA.

Denver-Aurora-Lakewood, CO MSA

Lending activity in the Denver-Aurora-Lakewood, CO MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 2 percent. The bank ranks ninth among 68 depository financial institutions in the assessment area, which places it in the top 14 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 0.9 percent based on the number of home mortgage loans originated or purchased. The bank ranks 28th among 835 home mortgage lenders in the assessment area, which places it in the top 4 percent of lenders. According to peer small business data for 2016, the bank has a 1.5 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks 11th among 177 small business lenders in the assessment area, which places it in the top 7 percent of lenders. For small loans to farms, the bank has a market share of 1.7 percent based on the number of small loans to farms originated or purchased. The bank ranks 10th among 28 farm lenders, which places it in the top 36 percent of lenders. Considering the bank’s higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: COLORADO						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Denver, CO	93.43	14,257	3,808,104	5,916	247,288	49	384	14	53,985	20,236	4,109,761	99.87
Limited Review												
Boulder, CO	4.82	519	206,934	524	14,193	1	9	0	0	1,044	221,136	0.13
Colorado Non-MSA	1.75	250	217,882	128	3,339	0	0	0	0	378	221,221	0.00
COLORADO	100.00	15,026	4,232,920	6,568	264,820	50	393	14	53,985	21,658	4,552,118	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is adequate. The distribution is adequate in the Denver-Aurora-Lakewood, CO MSA.

Denver-Aurora-Lakewood, CO MSA

The geographic distribution of home mortgage loans in the Denver-Aurora-Lakewood, CO MSA is adequate. Performance is adequate in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 4.5 percent is lower than the 6.3 percent of owner-occupied housing units in low-income geographies and lower than the 5.5 percent for aggregate lenders. The distribution in moderate-income geographies at 14.9 percent is lower than the 19.1 percent of owner-occupied housing units in moderate-income geographies and lower than the 17.2 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Denver-Aurora-Lakewood CO MSA	5,760	#####	88.2	193,207	6.3	4.5	5.5	19.1	14.9	17.2	36.1	34.1	36.2	38.5	46.4	41.1	0.0	0.0	0.0
LS Boulder CO MSA	519	206,934	7.9	15,659	2.8	1.9	3.2	15.0	12.7	15.9	45.8	46.1	46.7	36.5	39.3	34.2	0.0	0.0	0.0
LS Colorado Non-MSA	250	217,882	3.8	2,829	0.0	0.0	0.0	1.9	11.2	6.0	14.4	9.6	13.7	83.7	79.2	80.3	0.0	0.0	0.0
Total	6,529	#####	100.0	211,695	5.9	4.1	5.3	18.4	14.6	16.9	36.7	34.1	36.7	39.0	47.1	41.1	0.0	0.0	0.0

Source: 2010 U.S Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Denver-Aurora-Lakewood, CO MSA.

Denver-Aurora-Lakewood, CO MSA

The geographic distribution of small loans to businesses in the Denver-Aurora-Lakewood, CO MSA is excellent. Performance is excellent in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 8.8 percent is slightly higher than the 8.3 percent of businesses in low-income geographies and it is equal to the 8.8 percent performance for aggregate lenders. The distribution in moderate-income geographies at 20.1 percent is equal to the 20.1 percent of businesses in moderate-income geographies and it is slightly lower than the 20.3 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Denver-Aurora-Lakewood CO MSA	3,649	124,590	84.9	88,098	8.3	8.8	8.8	20.1	20.1	20.3	31.0	29.4	29.3	40.3	41.3	41.3	0.3	0.5	0.3
LS Boulder CO MSA	523	14,173	12.2	12,645	3.8	5.0	3.2	22.3	20.5	20.8	42.3	37.3	41.8	31.7	37.3	34.3	0.0	0.0	0.0
LS Colorado Non-MSA	128	3,339	3.2	2,279	0.0	0.0	0.0	1.0	7.1	1.8	18.5	14.1	14.9	80.5	83.6	83.3	0.0	0.0	0.0
Total	4,300	142,102	100.0	103,022	7.6	8.0	7.9	20.0	19.6	20.0	32.2	29.9	30.5	40.0	42.1	41.4	0.3	0.4	0.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is poor. The performance in the Denver-Aurora-Lakewood, CO MSA is poor.

Denver-Aurora-Lakewood, CO MSA

The geographic distribution of small loans to farms in the Denver-Aurora-Lakewood, CO MSA is poor, based on very poor performance in low-income geographies and adequate performance in moderate-income geographies. The geographic distribution of small loans to farms in low-income geographies at 0 percent is lower than the 6.8 percent of farms in low-income geographies and it is lower than the 1.4 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 10.5 percent is lower than the 17.6 percent of farms in moderate-income geographies; however, it exceeds the 8.8 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Denver-Aurora-Lakewood CO MSA	24	186	96.0	294	6.8	0.0	1.4	17.6	10.5	8.8	35.8	25.0	50.7	39.7	66.7	39.1	0.1	0.0	0.0
LS Boulder CO MSA	1	9	8.3	60	3.7	0.0	1.7	16.3	0.0	13.3	47.6	0.0	46.7	32.4	100.0	38.3	0.0	0.0	0.0
LS Colorado Non-MSA	0	0	0.0	10	0.0	0.0	0.0	0.0	0.0	0.0	14.1	0.0	0.0	85.9	0.0	100.0	0.0	0.0	0.0
Total	25	195	100.0	364	6.2	0.0	1.4	16.9	10.0	9.3	36.8	24.0	48.6	40.1	68.0	40.7	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Denver-Aurora-Lakewood, CO MSA.

Denver-Aurora-Lakewood, CO MSA

The distribution of home mortgage loans by borrower income in the Denver-Aurora-Lakewood, CO MSA is good. The distribution is adequate to low-income borrowers and it is good to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 9.5 percent is lower than the 21.9 percent of low-income families in the MSA; however, the bank’s performance is higher than the 5 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 15.4 percent is lower than the 17.1 percent of moderate-income families and it is lower than the 17 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Denver-Aurora-Lakewood CO MSA	5,760	1,706,479	88.2	193,207	21.9	9.5	5.0	17.1	15.4	17.0	20.3	19.4	22.8	40.7	48.1	38.0	0.0	7.7	17.2
LS Boulder CO MSA	519	206,934	7.9	15,659	22.1	9.8	6.6	16.6	12.9	15.2	20.1	20.4	22.4	41.3	52.0	44.8	0.0	4.8	11.0
LS Colorado Non-MSA	250	217,882	3.8	2,829	12.6	3.2	0.7	13.3	1.6	3.4	14.9	8.0	11.4	59.2	78.4	71.5	0.0	8.8	13.0
Total	6,529	2,131,295	100.0	211,695	21.8	9.3	5.1	17.0	14.7	16.7	20.2	19.0	22.6	41.0	49.5	39.0	0.0	7.5	16.7

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Denver-Aurora-Lakewood. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 31 percent of its small loans to businesses.

Denver-Aurora-Lakewood, CO MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Denver-Aurora-Lakewood, CO MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 53.4 percent is lower than the 79.8 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 43.6 percent for aggregate lenders, overall performance is good.

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
FS Denver-Aurora-Lakewood CO MSA	3,649	124,590	84.9	88,098	79.8	53.4	43.6	4.0	15.2	16.2	31.4
LS Boulder CO MSA	523	14,173	12.2	12,645	80.6	58.5	43.4	3.7	11.3	15.7	30.2
LS Colorado Non-MSA	128	3,339	3.4	2,279	76.2	45.3	49.9	5.5	18.8	18.4	35.9
Total	4,300	142,102	100.0	103,022	79.9	53.7	43.7	4.0	14.9	16.1	31.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is poor. The distribution is poor in the Denver-Aurora-Lakewood, CO MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 48 percent of its small loans to farms.

Denver-Aurora-Lakewood CO MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Denver-Aurora-Lakewood, CO MSA is poor. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 41.7 percent is lower than the 95.8 percent of farms with gross annual revenues of \$1 million or less. The bank’s distribution is also lower than the 55.8 percent for aggregate lenders.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Denver-Aurora-Lakewood CO MSA	24	186	96.0	294	95.8	41.7	55.8	2.7	10.5	1.5	50.0
LS Boulder CO MSA	1	9	8.3	60	96.4	100.0	61.7	1.7	0.0	1.9	0.0
LS Colorado Non-MSA	0	0	0.0	10	92.7	0.0	40.0	5.1	0.0	2.2	0.0
Total	25	195	100.0	364	95.8	44.0	56.3	2.6	10.0	1.6	48.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a significantly positive effect overall on the bank’s Lending Test performance in the state of Colorado.

Denver-Aurora-Lakewood, CO MSA

In the Denver-Aurora-Lakewood, CO MSA, CD lending has a significantly positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated 14 CD loans totaling \$54 million that mostly helped provide 516 units of affordable housing. CD lending represents 46.3 percent of the allocated Tier 1 Capital.

Examples of CD loans include:

- The bank provided a \$7.2 million construction-financing loan for the development of Aria Townhome Apartments, a 72-unit affordable multifamily project located in Denver CO.
- The bank provided a \$4.2 million construction-financing loan for the development of Dahlia Square Senior Apartments Phase II, which is a 40-unit LIHTC housing development for seniors age 62+ to be located in Denver CO.
- The bank provided a \$12 million construction loan for the development of Foundry Apartments, which is a 70-unit development in Englewood CO.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Colorado, lending under the MHA and HARP programs accounted for approximately 83 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Boulder, CO MSA, and Colorado Non-MSA is weaker than the overall Outstanding Lending Test performance in the state of Colorado primarily due to

weaker lending activity, weaker borrower income distributions, and lower levels of CD lending that had no effect on Lending Test performance in those assessment areas.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Colorado is rated Outstanding. Investment performance is excellent in the Denver-Aurora-Lakewood, CO MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Denver-Aurora-Lakewood, CO MSA

In the Denver-Aurora-Lakewood, CO MSA, Bank of America has an excellent level of CD investments. The bank made 88 CD investments during the current period totaling \$35.5 million. Approximately \$30.8 million or 87 percent of the current period investment dollars supported 873 units of affordable housing. In addition, the bank has 21 CD investments totaling \$6.2 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$41.7 million or 35.7 percent of allocated Tier 1 Capital, after adjusting for \$620.7 million in deposits derived outside of the assessment area. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$19.9 million or 56 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$11 million in a LIHTC equity investment for new construction of Aria Apartments a 72-unit multifamily affordable housing development to be located in the Chaffee Park neighborhood of Denver CO, which is a Neighborhood Stabilization Program 2 (NSP2) target area.
- The bank invested \$2 million in Accion New Mexico (Accion), a certified CDFI and a member of the Accion U.S. Network, which is the largest nonprofit micro- and small business-lending network in the United States.

QUALIFIED INVESTMENTS		Geography: COLORADO				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Denver, CO	21	6,167	88	35,487	109	41,654	89.66	0	0
Limited Review									
Boulder, CO	4	91	6	412	10	503	1.08	0	0
Colorado Non-MSA	0	0	0	0	0	0	0.00	0	0
COLORADO - Statewide	0	0	16	151	16	151	0.32	0	0
COLORADO - Non Assessed	13	2,804	13	1,344	26	4,148	8.93	0	0
COLORADO									
	38	9,062	123	37,394	161	46,456	100.00	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 bank's financial reporting system.									

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Boulder, CO MSA is consistent with the Outstanding Investment Test performance in the state of Colorado. Investment Test performance in the Colorado Non-MSA is weaker than the overall Outstanding Investment Test performance in the state of Colorado due to the lack of any CD investments in the assessment area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Colorado is rated Low Satisfactory. Service Test performance is adequate in the Denver-Aurora-Lakewood, CO MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Denver-Aurora-Lakewood, CO MSA

In the Denver-Aurora-Lakewood, CO MSA, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels when considering alternative delivery systems. Examiners based this conclusion on a comparison of the distribution of the bank's three financial centers with the distribution of the population. The bank has no financial centers in low- and moderate-income geographies where 11.1 percent and 23.1 percent of the population lives, respectively.

Examiners considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on

the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The customer usage for low- and moderate-income individuals exceeded the percentage of same individuals in the geographies. Access to retail banking services through alternative delivery systems helped to offset poor access to financial centers.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened three financial centers in upper-income geographies and closed a limited-service financial center in a moderate-income geography. The bank replaced the limited-service financial center with a full-service financial center and moved the financial center to a more central location (upper-income tract) within Denver.

Banking products and services do not vary in a way that inconveniences the assessment area to low- and moderate-income individuals. The bank offers a full range of products and services. Financial centers are generally open 9:00 am to 5:00 pm Monday through Friday and 9:00 am to 2:00 pm on Saturday. One financial center is open 8:30 am to 4:30 pm Monday through Friday with no Saturday banking.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Denver-Aurora-Lakewood CO MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	69	11.1	283,450	11.1	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	140	22.5	587,016	23.1	0	0.0	2	10.5	0	0.0	1	100.0
Middle	208	33.5	848,873	33.4	0	0.0	3	15.8	0	0.0	0	0.0
Upper	197	31.7	823,015	32.4	3	100.0	14	73.7	3	100.0	0	0.0
NA	7	1.1	1,128	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	621	100.0	2,543,482	100.0	3	100.0	19	100.0	3	100.0	1	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Denver-Aurora-Lakewood, CO MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 119 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 49 low- and moderate-income individuals and provided 43 financial education and foreclosure prevention workshops for 445 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 21 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, six employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Boulder, CO MSA and Colorado Non-MSA is consistent with the Low Satisfactory Service Test performance in the state of Colorado.

State of Connecticut

CRA Rating for Connecticut¹⁹: **Outstanding**
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Connecticut

The state of Connecticut is Bank of America's 10th largest rating area based on its total deposits in the state when excluding deposits in the Worcester, MA-CT Multistate MSA. Examiners excluded the Worcester, MA-CT Multistate MSA from the analysis of the state of Connecticut because examiners evaluated the multistate MSA as a separate rating area. As of June 30, 2016, the bank maintained approximately \$30 billion or 2.3 percent of its total domestic deposits in financial centers in areas of the state of Connecticut that do not include the Worcester, MA-CT Multistate MSA. Of the 61 depository financial institutions operating in the state of Connecticut that excludes the multistate MSA, Bank of America, with a deposit market share of 23.3 percent, is the largest. Competitors with deposit market shares greater than 5 percent include Webster Bank, N.A. (12.9 percent), People's United, N.A. (12.8 percent), Wells Fargo, N.A. (7 percent), TD Bank, N.A. (5.4 percent) and Citibank, N.A. (5.3 percent). As of December 31, 2016, the bank operated 134 financial centers and 290 ATMs in the portion of Connecticut that excludes the multistate MSA.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Hartford-West Hartford-East Hartford, CT MSA, Bank of America reported an additional \$2.6 billion in deposits of national corporations, in which the funds originated from communities

¹⁹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

Refer to the community profiles for the state of Connecticut in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Connecticut

Examiners selected two assessment areas for full-scope reviews and the remaining three assessment areas for limited-scope reviews. The full-scope assessment areas were the Bridgeport-Stamford-Norwalk, CT MSA and Hartford-West Hartford-East Hartford, CT MSA. While the Hartford-West Hartford-East Hartford, CT MSA carries approximately 62 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in Connecticut, examiners based the conclusions and ratings for the state on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 18,576 home mortgage loans totaling \$6.2 billion, 36,422 small loans to businesses totaling \$1.6 billion, 170 small loans to farms totaling \$3 million, and 35 CD loans totaling \$129.4 million. Based on loan volume, examiners weighted small loans to businesses, representing 66 percent of the volume, the most followed by home mortgage loans (33.7 percent), and small loans to farms (0.3 percent).

Examiners conducted telephone interviews with four local community services agencies representing neighborhood housing, economic development, and community development financial institutions. The community contacts noted that affordable housing along with revitalization of blighted areas continues to be a concern across the state. The agencies request that financial institutions can assist in closing the gap for affordable housing by offering financial and educational support to low- and moderate-income individuals and families. A review of the bank's investments noted the bank is active in the state in providing affordable housing assistance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Connecticut is rated High Satisfactory, based on excellent lending activity, good geographic distribution, and good borrower income distribution. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Connecticut is excellent. Lending activity is excellent in the Bridgeport-Stamford-Norwalk, CT MSA, Hartford-West Hartford-East Hartford, CT MSA, and remaining limited-scope assessment areas.

Bridgeport-Stamford-Norwalk, CT MSA

Lending activity in the Bridgeport-Stamford-Norwalk, CT MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 16.2 percent. The bank ranks second among 28 depository financial institutions in the assessment area, which places it in the top 8 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 3.6 percent based on the number home mortgage loans originated or purchased. The bank ranks sixth among 441 home mortgage lenders in the assessment area, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has an 8.4 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks third among 125 small business lenders in the assessment area, which places it in the top 3 percent of lenders. For small loans to farms, the bank has a market share of 11.1 percent based on the number of small loans to farms originated or purchased. The bank ranks fourth among seven farm lenders, which places it in the bottom 42 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

Hartford-West Hartford-East Hartford, CT MSA

Lending activity in the Hartford-West Hartford-East Hartford, CT MSA is excellent. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 42.9 percent. The bank ranks first among 29 depository financial institutions in the assessment area, which places it in the top 4 percent of institutions. The bank's market share also includes \$2.6 billion in deposits not derived from the local assessment area. Excluding those nonlocal deposits, the bank's market share is 39.2 percent. According to peer mortgage data for 2016, the bank has a market share of 2.4 percent based on the number of home mortgage loans originated or purchased. The bank ranks seventh among 454 home mortgage lenders, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has an 8.6 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fourth among 122 small business lenders in the assessment area, which places it in the top 4 percent of lenders. For small loans to farms, the bank has a market share of 15.8 percent based on the number of small loans to farms originated or purchased. The bank ranks second among 12 farm lenders, which places it in the top 17 percent of lenders. Considering the ranking for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: CONNECTICUT						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Bridgeport, CT	33.36	5,734	3,378,784	12,644	545,953	29	318	11	46,387	18,418	3,971,442	24.57
Hartford, CT	32.98	6,234	1,317,912	11,906	542,342	58	1,057	10	40,062	18,208	1,901,373	61.69
Limited Review												
New Haven, CT	21.60	4,254	937,351	7,628	359,811	30	184	11	36,767	11,923	1,334,113	10.40
Norwich, CT	5.68	1,027	236,143	2,080	74,402	26	1,193	1	97	3,134	311,835	2.02
Connecticut Non-MSA	6.38	1,327	335,654	2,164	87,181	27	222	2	6,056	3,520	429,113	1.32
CONNECTICUT	100.00	18,576	6,205,844	36,422	1,609,689	170	2,974	35	129,368	55,203	7,947,875	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is adequate in the Bridgeport-Stamford-Norwalk, CT MSA and excellent in the Hartford-West Hartford-East Hartford, CT MSA.

Bridgeport-Stamford-Norwalk, CT MSA

The geographic distribution of home mortgage loans in the Bridgeport-Stamford-Norwalk, CT MSA is adequate. Performance is poor in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 2.8 percent is lower than the 5.2 percent of owner-occupied housing units in low-income geographies and lower than the 3.6 percent for aggregate lenders. The distribution in moderate-income geographies at 11.8 percent is lower than the 15.9 percent of owner-occupied housing units in moderate-income geographies and lower than the 13.2 percent for aggregate lenders.

Hartford-West Hartford-East Hartford, CT MSA

The geographic distribution of home mortgage loans in the Hartford-West Hartford-East Hartford, CT MSA is excellent. Performance is excellent in low-income geographies and excellent in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 3.5 percent is comparable to the 3.6 percent of owner-occupied

housing units in low-income geographies and it is higher than the 3.1 percent performance for aggregate lenders. The distribution in moderate-income geographies at 11.6 percent exceeds the 11.1 percent of owner-occupied housing units in moderate-income geographies and it exceeds the 9.6 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Bridgeport-Stamford-Norwalk CT MSA	2,445	1,723,249	34.8	25,483	5.2	2.6	3.6	15.9	11.2	13.2	40.3	28.3	39.2	38.6	57.9	44.0	0.0	0.0	0.0
FS Hartford-West Hartford-East Hartford CT MSA	2,411	546,820	34.3	32,521	3.6	3.5	3.1	11.1	11.3	9.6	46.7	40.8	46.0	38.6	44.4	41.3	0.0	0.0	0.0
LS Connecticut Non-MSA	366	112,910	5.2	4,951	0.5	0.8	0.2	14.7	12.0	12.5	58.2	62.8	58.1	26.6	24.3	29.2	0.0	0.0	0.0
LS New Haven-Milford CT MSA	1,455	333,743	20.7	19,102	3.5	2.5	2.7	16.6	12.9	12.9	40.5	36.2	40.6	39.4	48.4	43.8	0.0	0.0	0.0
LS Norwich-New London CT MSA	343	87,275	4.9	7,283	1.5	2.3	1.6	11.9	11.7	11.3	56.7	51.3	54.5	29.9	34.7	32.7	0.0	0.0	0.0
Total	7,020	2,803,997	100.0	89,340	3.6	2.8	2.9	14.0	11.7	11.6	45.2	37.2	44.2	37.3	48.4	41.2	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The distribution is excellent in the Bridgeport-Stamford MSA and good in the Hartford-West Hartford-East Hartford, CT MSA.

Bridgeport-Stamford-Norwalk, CT MSA

The geographic distribution of small loans to businesses in the Bridgeport-Stamford-Norwalk, CT MSA is excellent. Performance is excellent in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 10.4 percent is equal to the 10.4 percent of businesses in low-income geographies and it exceeds the 8.8 percent performance for aggregate lenders. The distribution in moderate-income geographies at 16.3 percent is equal to the 16.3 percent of businesses in moderate-income geographies and it exceeds the 11.1 percent performance for aggregate lenders.

Hartford-West Hartford-East Hartford, CT MSA

The geographic distribution of small loans to businesses in the Hartford-West Hartford-East Hartford, CT MSA is good. The distribution is good in low-income geographies and good in moderate-income geographies. The geographic distribution in low-income geographies at 7.2 percent is below the 9.2 percent of businesses in low-income geographies and it is slightly lower than the 7.5 percent performance for aggregate lenders. The geographic distribution in

moderate-income geographies at 10 percent is lower than the 11 percent of businesses in moderate-income geographies and it is slightly lower than the 11.1 percent performance of aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Bridgeport-Stamford-Norwalk CT MSA	7,950	320,342	35.6	31,937	10.4	10.4	8.8	16.3	16.3	15.8	32.7	35.1	34.4	40.6	38.2	41.0	0.0	0.0	0.0
FS Hartford-West Hartford-East Hartford CT MSA	7,261	307,655	32.6	26,757	9.2	7.2	7.5	11.0	10.0	11.1	42.0	41.4	44.5	37.5	41.2	36.8	0.4	0.2	0.2
LS Connecticut Non-MSA	1,111	38,507	5.0	6,036	1.2	1.2	1.0	14.5	14.9	11.1	59.5	58.5	60.6	24.8	25.7	27.4	0.0	0.0	0.0
LS New Haven-Milford CT MSA	4,726	219,494	21.2	22,319	8.5	7.1	6.2	15.3	13.2	14.4	38.9	39.9	37.7	37.3	39.8	41.7	0.0	0.0	0.0
LS Norwich-New London CT MSA	1,258	39,142	5.6	4,501	2.5	2.3	2.4	18.2	18.5	17.5	51.4	46.7	51.2	27.8	32.5	28.9	0.2	0.0	0.0
Total	22,306	925,140	100.0	91,550	8.5	7.7	7.0	14.4	13.7	13.8	39.8	40.0	40.7	37.1	38.6	38.4	0.1	0.1	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is excellent. The distribution is excellent in the Bridgeport-Stamford-Norwalk, CT MSA and excellent in the Hartford-West Hartford-East Hartford, CT MSA.

Bridgeport-Stamford-Norwalk, CT MSA

The geographic distribution of small loans to farms in the Bridgeport-Stamford-Norwalk, CT MSA is excellent, based on excellent performance in low-income geographies and excellent performance in moderate-income geographies. The geographic distribution of small loans to farms in low-income geographies at 12.5 percent is higher than the 9.5 percent of farms in low-income geographies and it is higher than the 0 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 18.8 percent is higher than the 18.3 percent of farms in moderate-income geographies and it is higher than the 5.7 percent for aggregate lenders.

Hartford-West Hartford-East Hartford, CT MSA

The geographic distribution of small loans to farms in the Hartford-West Hartford-East Hartford, CT MSA is excellent, based on excellent performance in low-income geographies and excellent performance in moderate-income geographies. The geographic distribution of small loans to farms in low-income geographies at 6.3 percent is higher than the 2.9 percent of farms in low-income geographies and it is higher than the 1 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 6.3 percent is lower than the 6.8

percent of farms in moderate-income geographies; however, it exceeds the 3.1 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Bridgeport-Stamford-Norwalk CT MSA	20	273	19.3	35	9.5	12.5	0.0	18.3	18.8	5.7	35.3	15.0	40.0	36.9	60.0	54.3	0.0	0.0	0.0
FS Hartford-West Hartford-East Hartford CT MSA	45	986	41.0	97	2.9	6.3	1.0	6.8	6.3	3.1	43.5	40.0	38.1	46.7	55.6	57.7	0.0	0.0	0.0
LS Connecticut Non-MSA	12	103	13.0	56	0.1	0.0	0.0	10.1	30.0	12.5	61.4	33.3	62.5	28.4	58.3	25.0	0.0	0.0	0.0
LS New Haven-Milford CT MSA	21	151	20.2	62	3.4	25.0	0.0	11.8	0.0	1.6	33.0	23.5	19.4	51.8	76.2	79.0	0.0	0.0	0.0
LS Norwich-New London CT MSA	24	1,086	21.7	24	1.0	0.0	0.0	5.9	20.8	12.5	62.1	41.7	62.5	31.0	50.0	25.0	0.0	0.0	0.0
Total	122	2,599	100.0	274	4.5	3.3	0.4	11.5	9.8	5.8	42.6	30.3	41.2	41.4	56.6	52.6	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is adequate in the Bridgeport-Stamford-Norwalk, CT MSA and excellent in the Hartford-West Hartford-East Hartford, CT MSA.

Bridgeport-Stamford-Norwalk, CT MSA

The distribution of home mortgage loans by borrower income in the Bridgeport-Stamford-Norwalk, CT MSA is adequate. The distribution is adequate to low-income borrowers and it is adequate to moderate-income borrowers. The proportion of the bank’s home mortgage loans

to low-income borrowers at 7.8 percent is lower than the 22.7 percent of low-income families in the MSA; however, the bank’s performance is higher than the 6.1 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 11.7 percent is lower than the 17 percent of moderate-income families and it is lower than the 14.8 percent performance for aggregate lenders.

Hartford-West Hartford-East Hartford, CT MSA

The distribution of home mortgage loans by borrower income in the Hartford-West Hartford-East Hartford, CT MSA is excellent. The distribution is good to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 11 percent is lower than the 21.4 percent of low-income families in the MSA; however, it is higher than the 6.6 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 19.6 percent slightly exceeds the 17 percent of moderate-income families in the MSA and it is slightly higher than the 19 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Bridgeport-Stamford-Norwalk CT MSA	2,445	1,723,249	34.8	25,483	22.7	7.6	6.1	16.7	10.3	14.8	20.0	11.8	18.4	40.7	61.0	49.1	0.0	9.3	11.6
FS Hartford-West Hartford-East Hartford CT MSA	2,411	546,820	34.3	32,521	21.4	10.5	6.6	17.0	18.0	19.0	22.1	21.3	22.4	39.6	41.0	34.2	0.0	9.1	17.9
LS Connecticut Non-MSA	366	112,910	5.2	4,951	17.9	9.8	9.9	19.0	17.2	21.2	24.9	22.7	22.2	38.2	41.3	30.5	0.0	9.0	16.2
LS New Haven-Milford CT MSA	1,455	333,743	20.7	19,102	22.9	7.2	5.7	16.7	17.2	17.9	19.8	22.1	23.1	40.6	46.1	35.1	0.0	7.4	18.2
LS Norwich-New London CT MSA	343	87,275	4.9	7,283	18.3	13.7	5.8	19.2	17.8	18.0	23.3	21.0	22.8	39.2	38.2	36.9	0.0	9.3	16.5
Total	7,020	2,803,997	100.0	89,340	21.6	8.9	6.4	17.1	15.1	17.6	21.2	18.2	21.5	40.0	48.9	38.7	0.0	8.8	15.9

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Bridgeport-Stamford-Norwalk, CT MSA and good in the Hartford-West Hartford-East Hartford, CT MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 31 percent of its small loans to businesses.

Bridgeport-Stamford-Norwalk, CT MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Bridgeport-Stamford-Norwalk, CT MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 52.6 percent is lower than the 80.5 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 48.3 percent for aggregate lenders, overall performance is good.

Hartford-West Hartford-East Hartford, CT MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Hartford-West Hartford-East Hartford, CT MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 50.6 percent is lower than the 78.6 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 47.9 percent for aggregate lenders, overall performance is good.

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
FS Bridgeport-Stamford-Norwalk CT MSA	7,950	320,342	35.6	31,937	80.5	52.6	48.3	5.2	11.4	14.3	36.0
FS Hartford-West Hartford-East Hartford CT MSA	7,261	307,655	32.6	26,757	78.6	50.6	47.9	5.4	12.3	16.0	37.2
LS Connecticut Non-MSA	1,111	38,507	5.0	6,036	82.6	49.9	52.6	4.3	8.2	13.1	41.9
LS New Haven-Milford CT MSA	4,726	219,494	21.2	22,319	79.3	51.3	47.2	5.2	12.9	15.5	35.8
LS Norwich-New London CT MSA	1,258	39,142	5.6	4,501	79.1	51.4	49.5	4.3	9.4	16.6	39.2
Total	22,306	925,140	100.0	91,550	79.7	51.5	48.3	5.2	11.7	15.2	36.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate, primarily driven by performance in the Hartford-West Hartford-East Hartford, CT MSA. The distribution is good in the Bridgeport-Stamford-Norwalk, CT MSA and adequate in the Hartford-West Hartford-East Hartford, CT MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 39 percent of its small loans to farms.

Bridgeport-Stamford-Norwalk, CT MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Bridgeport-Stamford-Norwalk, CT MSA is good. Based on farms with known revenues, the

proportion of the bank’s small loans to farms at 70 percent is lower than the 96.4 percent of farms with gross annual revenues of \$1 million or less. However, the bank’s distribution exceeds the 60 percent for aggregate lenders.

Hartford-West Hartford-East Hartford, CT MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Hartford-West Hartford-East Hartford, CT MSA is adequate. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 55.6 percent is lower than the 96.6 percent of farms with gross annual revenues of \$1 million or less. The bank’s distribution is also lower than the 62.9 percent for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Bridgeport-Stamford-Norwalk CT MSA	20	273	20.0	35	96.4	70.0	60.0	2.3	18.2	1.3	25.0
FS Hartford-West Hartford-East Hartford CT MSA	45	986	36.9	97	96.6	55.6	62.9	1.9	7.1	1.5	42.2
LS Connecticut Non-MSA	12	103	15.4	56	98.3	83.3	64.3	1.4	16.7	0.2	25.0
LS New Haven-Milford CT MSA	21	151	20.2	62	96.2	47.6	64.5	2.3	17.6	1.5	38.1
LS Norwich-New London CT MSA	24	1,086	21.7	24	98.3	62.5	66.7	1.0	11.1	0.7	29.2
Total	122	2,599	100.0	274	96.8	60.7	63.5	2.0	7.4	1.2	32.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect overall on the bank’s Lending Test performance in the state of Connecticut. The bank met the community’s credit needs primarily through retail lending.

Bridgeport-Stamford-Norwalk, CT MSA

In the Bridgeport-Stamford-Norwalk, CT MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated 11 CD loans totaling \$46.4 million that primarily helped provide 96 units of affordable housing. CD lending represents 1.7 percent of the allocated Tier 1 Capital.

Examples of CD loans include:

- The bank provided \$2.5 million in funding to the Connecticut Housing Finance Authority (CHFA), which allowed the CHFA to re-fund a loan it provides to the Danbury Housing Authority (DHA) for financing the installation of energy conservation measures at several DHA properties. The DHA administers the public housing program in Danbury of approximately 900 apartment units and it administers approximately 1,100 Section 8 vouchers.
- The bank provided \$9.8 million through the bank’s Special Bond Offering (SBO) product for Multifamily Housing Revenue Bonds. The SBO helped to finance the construction of The Residences at Laurel Hill, a 72-unit multifamily residential housing project in

Brookfield, CT. All units are restricted to incomes at or below 60 percent of the area median income. The bank also provided the term loan for \$6.9 million.

- The bank provided \$23.5 million in construction financing for Park 215, a mixed-use, mixed-income 78-unit multifamily housing complex in Stamford, CT. The development will comprise 47 LIHTC units restricted to incomes at or below 60 percent of the area median income.

Hartford-West Hartford-East Hartford, CT MSA

In the Hartford-West Hartford-East Hartford, CT MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated 10 CD loans totaling \$40 million that primarily helped provide 238 units of affordable housing. CD lending represents 2 percent of the allocated Tier 1 Capital, after considering \$2.6 billion in deposits from national corporations in which the deposits did not derive from the local community.

Examples of CD loans include:

- The bank provided \$17.4 million in financing for the acquisition and historic rehabilitation of 390 Capitol, a former mill building in downtown Hartford, CT. The developer will gut the building and convert it into 112 multifamily units comprising 23 affordable units at 50 percent of the area median income and 89 work-force housing market rate units at 120 percent of the area median income.
- The bank provided \$2.1 million in construction financing for Jefferson Heights, a 70-unit affordable multifamily housing project in New Britain, CT for seniors aged 62 or older. All units are restricted incomes at or below 60 percent of the area median income.
- The bank provided \$2 million in funding to the Hartford Community Loan Fund (HCLF), a non-profit certified CDFI. The HCLF's mission is to stabilize and revitalize Hartford's neighborhoods and create affordable housing and economic opportunities for residents and business owners in the city's low- and moderate-income neighborhoods.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Connecticut, lending under the MHA and HARP programs accounted for 89 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Norwich-New London, CT MSA, New Haven-Milford, CT MSA, and Connecticut Non-MSA is stronger than the overall High Satisfactory Lending Test performance in the state of Connecticut primarily due to higher relative levels of CD lending that positively affected Lending Test performance in those assessment areas.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Connecticut is rated Outstanding. Investment performance is adequate in the Bridgeport-Stamford-Norwalk, CT MSA and excellent in the Hartford-West Hartford-East Hartford, CT MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Bridgeport-Stamford-Norwalk, CT MSA

In the Bridgeport-Stamford-Norwalk, CT MSA, Bank of America has an adequate level of community development investments. The bank made 53 CD investments during the current period totaling \$40.4 million. Approximately \$3.7 million or 55 percent of the current period investment dollars supported 276 units of affordable housing. In addition, the bank has 37 CD investments totaling \$14.5 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$55 million or 6 percent of allocated Tier 1 Capital. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$36.1 million or 89 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$5.3 million in a LIHTC to fund the construction of Albion Street Apartments, a 35-unit public housing development in Bridgeport, CT. All units are restricted to families earning no more than 60 percent of the area median income.
- The bank invested \$19.6 million in a LIHTC to finance the construction of Park 215, a 78-unit mixed-use, mixed-income housing development. The development will include 47 units restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$9.6 million in a LIHTC to finance the construction of St. Paul's Commons, a 56-unit affordable housing development in Bridgeport, CT. The development comprises two sites approximately 1.5 miles apart. One site is restricted to seniors aged 62 or older and the site is for families. All units are restricted to incomes at or below 60 percent of the area median income.

Hartford-West Hartford-East Hartford, CT MSA

In the Hartford-West Hartford-East Hartford, CT MSA, the bank has an excellent level of CD investments. The bank made 301 CD investments during the current period totaling \$194 million. Approximately \$190.2 million or 98 percent of the current period investment dollars supported 232 units of affordable housing. In addition, the bank has 178 CD investments totaling \$36.1 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$230.2 million or 11.7 percent of allocated Tier 1 Capital, after considering the \$2.6 billion in deposits that did not originate from the assessment area. In addition to the community development investments, Bank of America made 73 grants and donations of more than \$2 million to various community development organizations that serve the needs of the community. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$142.5 million or 73 percent of the investment dollars.

Examples of community development investments include:

- The bank provided \$2 million in funding to the Boston Community Loan Fund (BCLF), a certified CDFI. The mission of the BCLF is to create and preserve healthy communities where low-income people live and work. The BCLF finances community development projects that include affordable housing, childcare, public education, healthcare facilities, and commercial revitalization projects.
- The bank invested \$33.7 million in a Section 42 LIHTC Fund that indirectly invests in a portfolio of nine LIHTC affordable housing projects. The funds represent the amount invested in Square Village, a development of 32 two-story apartments in Manchester, CT containing 379 rental units. All units, except one unit reserved for the onsite property manager, are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$1.9 million in funding to the Hartford Community Loan Fund (HCLF), a certified CDFI. The mission of the HCLF is to provide and promote just and affordable financial services that benefit the low-wealth residents of Hartford, CT. HCLF's primary lending product is a construction/rehab loan designed to create affordable housing opportunities in low- and moderate-income areas. This funding will allow HCLF to expand its construction/rehab mini permanent loan pool. According to the HCLF, the construction/rehab program improved approximately 430 units. Approximately 88 percent of those units were affordable to residents with incomes at or below 50 percent of the area median income.

Table 14. Qualified Investments								2012-2016	
QUALIFIED INVESTMENTS		Geography: CONNECTICUT				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Bridgeport, CT	37	14,513	53	40,443	90	54,956	13.71	3	18,213
Hartford, CT	178	36,121	301	194,047	479	230,167	57.40	0	0
Limited Review									
New Haven, CT	13	6,941	87	47,774	100	54,716	13.65	1	9,625
Norwich, CT	6	190	46	7,428	52	7,618	1.90	0	0
Connecticut Non-MSA	7	1,131	32	3,620	39	4,751	1.18	0	0
CONNECTICUT - Statewide	0	0	17	48,751	17	48,751	12.16	0	0
CONNECTICUT	241	58,895	536	342,064	777	400,959	100.00	4	27,838

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Norwich-New London, CT MSA, New Haven-Milford, CT MSA, and Connecticut Non-MSA is consistent with the Outstanding Investment Test performance in the state of Connecticut.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Connecticut is rated Outstanding. Service Test performance is good in the Bridgeport-Stamford-Norwalk, CT MSA and excellent in the Hartford-West Hartford-East Hartford, CT MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Bridgeport-Stamford-Norwalk, CT MSA

In the Bridgeport-Stamford-Norwalk, CT MSA, the bank's service delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 48 financial centers with the distribution of the population. The bank has six financial centers in low-income geographies or 12.5 percent of its financial centers where 13.5 percent of the population lives. The bank also has six financial centers or 12.5 percent of its financial centers located in moderate-income geographies where 19.5 percent of the population lives.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies.

The bank has five financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to moderate-income census tracts. The adjacent financial centers help improve access to retail banking services to individuals in moderate-income geographies.

Financial center openings and closings generally did not affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank closed six financial centers during the evaluation period. The bank closed two financial centers in low-income geographies, one in a moderate-income geography, and three in middle- and upper-income geographies. Despite the closures, financial centers remain accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are more restrictive in moderate-income geographies. Financial centers are generally open 9:00 am to 4:00 pm Monday through Friday and 9:00 am to 12:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Bridgeport-Stamford-Norwalk CT MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	33	15.7	123,570	13.5	6	12.5	17	19.5	0	0.0	2	33.3
Moderate	37	17.6	178,760	19.5	6	12.5	16	18.4	0	0.0	1	16.7
Middle	67	31.9	308,502	33.6	20	41.7	32	36.8	0	0.0	2	33.3
Upper	73	34.8	305,997	33.4	16	33.3	22	25.3	0	0.0	1	16.7
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	210	100.0	916,829	100.0	48	100.0	87	100.0	0	100.0	6	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Hartford-West Hartford-East Hartford, CT MSA

In the Hartford-West Hartford-East Hartford, CT MSA, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 46 financial centers with the distribution of the population. The bank has 6 financial centers or 13 percent of its financial centers in low-income geographies where 11.8 percent of the population lives. The bank has five financial centers or 10.9 percent of its financial centers located in moderate-income geographies where 14 percent of the population lives.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-

income individuals and geographies. The proportions of customers in low- and moderate-income geographies using online, telephone, mobile, and text banking are near the proportion of the population in low- and moderate-income geographies. Cash dispensing and full-service ATM usage by customers in low- and moderate-income geographies exceeds the proportion of the population in low- and moderate-income geographies.

The bank has five financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. One of the financial centers provides additional access to retail banking services in low-income geographies and four financial centers provide additional access in moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened two financial center and closed sixteen. The bank closed three financial centers in low-income geographies, four in moderate-income geographies, and the remaining nine in middle- and upper-income geographies. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconvenience the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are more restrictive in moderate-income geographies. Financial centers are generally open 9:00 am to 4:00 pm Monday through Friday and 9:00 am to 12:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Hartford-West Hartford-East Hartford CT MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	46	15.9	142,551	11.8	6	13.0	19	17.9	0	0.0	3	18.8
Moderate	42	14.5	169,588	14.0	5	10.9	13	12.3	1	50.0	4	25.0
Middle	114	39.3	504,873	41.6	20	43.5	40	37.7	0	0.0	3	18.8
Upper	82	28.3	379,496	31.3	15	32.6	33	31.1	1	50.0	6	37.5
NA	6	2.1	15,873	1.3	0	0.0	1	0.9	0	0.0	0	0.0
Totals	290	100.0	1,212,381	100.0	46	100.0	106	100.0	2	100.0	16	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Bridgeport-Stamford-Norwalk, CT MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 47 community development services targeted to low- and moderate-income individuals. Employees provided 12 financial education and foreclosure prevention workshops for 547 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 20 webinars and workshops with non-profit organizations to help the organizations with capacity building. In

addition, 15 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Hartford-West Hartford-East Hartford, CT MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 89 community development services targeted to low- and moderate-income individuals. Employees provided 31 financial education and foreclosure prevention workshops for 584 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 26 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 30 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the New Haven-Milford, CT MSA and Connecticut Non-MSA is consistent with the Outstanding Service Test performance in the state of Connecticut. Performance in the Norwich-New London, CT MSA is weaker than the overall Outstanding Service Test performance in the state of Connecticut primarily due to the weaker distribution of financial centers, particularly in low-income geographies.

State of Delaware

CRA Rating for Delaware²⁰:	Satisfactory
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>High Satisfactory</u>
The Service Test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Good distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Good level and responsiveness of qualified investments; and
- Reasonably accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Delaware

Bank of America, N.A. has no financial centers in the state of Delaware in areas that exclude the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Multistate MSA and Salisbury, MD-DE Multistate MSA. Examiners excluded the two multistate MSAs from the analysis of the state of Delaware because examiners evaluated the two multistate MSAs as separate rating areas. Because the bank has no financial centers in the state of Delaware in areas that exclude the multistate MSAs, deposit market share data is not available. As of December 31, 2016, the bank operated one ATM in the state of Delaware. Depository financial institutions in the rating area with deposit market shares greater than 5 percent include Manufacturers and Traders Trust Company (28.9 percent), PNC Bank (20.8 percent), Wilmington Savings Fund Society (16.7 percent), Citizens Bank (10.9 percent), and Wells Fargo Bank (9.4 percent).

Refer to the community profiles for the state of Delaware in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

²⁰ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in Delaware

The bank has defined the Dover, DE MSA as its sole assessment area in the state of Delaware. Examiners based conclusions and ratings for the state of Delaware solely on performance in the Dover, DE MSA. During the evaluation period, Bank of America originated or purchased 384 home mortgage loans totaling \$65.6 million, 301 small loans to businesses totaling \$5.9 million, 10 small loans to farms totaling \$46,000, and 1 CD loan totaling \$240,000. Loan volumes include loans that originated or purchased in the Delaware Non-MSA assessment area (Sussex County) prior to OMB including the county in the Salisbury, MD-DE Multistate MSA. Based on loan volume, examiners weighted home mortgage loans, representing 55 percent of the volume, the most followed by small loans to businesses (43 percent), and small loans to farms (2 percent).

Examiners conducted a telephone interview with an affordable housing representative at one local community services agency. The contact noted the need for affordable housing due to the increasing senior population and the need to revitalize blighted areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DELAWARE

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Delaware is rated High Satisfactory, based on excellent lending activity, good geographic distribution, and good borrower income distribution.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Delaware is excellent. Lending activity is excellent in the Dover, DE MSA.

Dover, DE MSA

Lending activity in the Dover, DE MSA is excellent. Because the bank has no financial centers in the state of Delaware, deposit market share data is not available. According to peer mortgage data for 2016, the bank has a market share of 1.7 percent based on the number of home mortgage loans originated or purchased. The bank ranks 14th among 249 home mortgage lenders in the assessment area, which places it in the top 6 percent of 249 lenders. According to peer small business data for 2016, the bank has a 3.7 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks 10th among 68 small business lenders, which places it in the top 15 percent of the lenders. The bank originated or purchased too few small loans to farms during the evaluation period for any meaningful analysis. Considering the bank has no deposits derived from the community, its overall lending activity is excellent.

LENDING VOLUME												Geography: DELAWARE		Evaluation Period: January 1, 2012 to December 31, 2016	
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)				
Full Review															
Dover, DE	35.26	384	65,636	301	5,899	10	46	1	240	696	71,821	0.00			
Delaware Non-MSA	64.74	937	226,891	329	8,117	12	60	0	0	1,278	235,068	0.00			
DELAWARE	100.00	1,321	292,527	630	14,016	22	106	1	240	1,974	306,889	100.00			

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is good in the Dover, DE MSA.

Dover, DE MSA

The geographic distribution of home mortgage loans in the Dover, DE MSA is good. There are no low-income census tracts in the Dover, DE MSA. Performance is good in moderate-income geographies. The distribution in moderate-income geographies at 7.6 percent is lower than the 9.2 percent of owner-occupied housing units in moderate-income geographies; however, the bank slightly exceeds the 7.2 percent for aggregate lenders.

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
FS Dover DE MSA	384	65,636	100.0	6,157	0.0	0.0	0.0	9.2	7.6	7.2	75.3	77.1	78.3	15.5	15.4	14.5	0.0	0.0	0.0
Total	384	65,636	100.0	6,157	0.0	0.0	0.0	9.2	7.6	7.2	75.3	77.1	78.3	15.5	15.4	14.5	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Dover, DE MSA.

Dover, DE MSA

The geographic distribution of small loans to businesses in the Dover, DE MSA is excellent. There are no low-income census tracts in the Dover, DE MSA. Performance is excellent in moderate-income geographies. The distribution in moderate-income geographies at 26.2 percent exceeds the 20.2 percent of businesses in moderate-income geographies and it exceeds the 19.5 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Dover DE MSA	301	5,899	100.0	2,689	0.0	0.0	0.0	20.2	26.2	19.5	65.0	53.5	65.3	14.8	20.3	15.2	0.0	0.0	0.0
Total	301	5,899	100.0	2,689	0.0	0.0	0.0	20.2	26.2	19.5	65.0	53.5	65.3	14.8	20.3	15.2	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The bank originated or purchased too few small loans to farms during the evaluation period for any meaningful analysis.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Dover DE MSA	10	46	100.0	65	0.0	0.0	0.0	8.4	0.0	13.8	77.6	100.0	80.0	14.0	0.0	6.2	0.0	0.0	0.0
Total	10	46	100.0	65	0.0	0.0	0.0	8.4	0.0	13.8	77.6	100.0	80.0	14.0	0.0	6.2	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

Examiners noted no conspicuous or unexplained gaps in lending in moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Dover, DE MSA.

Dover, DE MSA

The distribution of home mortgage loans by borrower income in the Dover, DE MSA is good. The distribution is adequate to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 8.3 percent is lower than the 18.7 percent of low-income families in the MSA; however, the bank’s performance exceeded the 4.2 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 28.1 percent exceeds the 18.4 percent of moderate-income families and it exceeds the 16.5 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Dover DE MSA	384	65,636	100.0	6,157	18.7	8.3	4.2	18.4	28.1	16.5	23.3	28.1	22.0	39.6	19.3	27.2	0.0	16.1	30.1
Total	384	65,636	100.0	6,157	18.7	8.3	4.2	18.4	28.1	16.5	23.3	28.1	22.0	39.6	19.3	27.2	0.0	16.1	30.1

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Dover, DE MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 36 percent of its small loans to businesses.

Dover, DE MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Dover, DE MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 48.2 percent is lower than the 76.9 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 46.2 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Dover DE MSA	301	5,899	100.0	2,689	76.9	48.2	46.2	3.7	15.9	19.4	35.9
Total	301	5,899	100.0	2,689	76.9	48.2	46.2	3.7	15.9	19.4	35.9

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The bank originated or purchased too few small loans to farms for any meaningful analysis.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Dover DE MSA	10	46	100.0	65	97.5	60.0	29.2	1.3	0.0	1.1	40.0
Total	10	46	100.0	65	97.5	60.0	29.2	1.3	0.0	1.1	40.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect on the bank’s Lending Test performance in the state of Delaware, based on its limited presence in the state. The bank met the community’s credit needs primarily through retail lending.

Dover, DE MSA

In the Dover, DE MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated one CD loan totaling \$240,000 for affordable housing purposes. This loan did not create any new units of affordable housing.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Lending under the MHA and HARP programs accounted for 84 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank’s level of qualified investments.

Bank of America’s performance under the Investment Test in the state of Delaware is rated High Satisfactory. Investment performance is good in the Dover, DE MSA.

Dover, DE MSA

In the Dover, DE MSA, Bank of America has a good level of community development investments considering its very limited presence in the state of Delaware. The bank made 21 CD investments during the current evaluation period totaling \$1 million. Approximately \$823,000 or 83 percent of the current period investment dollars supported three units of affordable housing. In addition, the bank has five CD investments totaling \$386,000 it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$1.4 million. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$800,000 or 80 percent of the investment dollars.

QUALIFIED INVESTMENTS		Geography: DELAWARE				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Dover, DE	5	\$386	21	\$989	26	1,374	5	0	0
DELAWARE - Statewide	4	\$24,175	63	\$3,957	67	28,132	95	0	0
DELAWARE	9	\$24,561	84	\$4,946	93	29,507	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 bank's financial reporting system.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America’s performance under the Service Test in the state of Delaware is rated Low Satisfactory. Service Test performance is adequate in the Dover, DE MSA.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank’s retail banking services.

Dover, DE MSA

In the Dover, DE MSA, the bank’s service delivery systems are reasonably accessible to geographies and individuals of different income levels. Because the bank has no financial centers in the state of Delaware, customers access retail banking services through alternative delivery systems, including ATMs, telephone, online, mobile, and text banking. Based on customer usage data provided by the bank, alternative delivery systems have a positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Dover DE MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	5	15.6	19,750	12.2	0	0.0	1	100.0	0	0.0	0	0.0
Middle	22	68.8	119,687	73.7	0	0.0	0	0.0	0	0.0	0	0.0
Upper	5	15.6	22,873	14.1	0	0.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	32	100.0	162,310	100.0	0	100.0	1	100.0	0	100.0	0	100.0

Source: 2010 U.S. Census & Bank Data
Due to rounding, totals may not equal 100.0

Community Development Services

Dover, DE MSA

The bank provides an adequate level of community development services. During the evaluation period, the bank participated with community development organizations to provide 23 community development services targeted to low- and moderate-income individuals. Employees provided six financial education and foreclosure prevention workshops for 230 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in one webinar with a non-profit organization to help the organization with capacity building. In addition, eight employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

State of Florida

CRA Rating for Florida²¹:	Outstanding
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business/farm revenue size;
- Relatively high level of CD lending that has a positive effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Florida

The state of Florida is Bank of America's fifth largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$103 billion or 8.6 percent of its total domestic deposits in financial centers within the state of Florida. Of the 237 depository financial institutions operating in the state, Bank of America, with a deposit market share of 19.2 percent, is the largest. Depository financial institutions in the state with deposit market shares greater than 5 percent include Wells Fargo Bank (14.7 percent), SunTrust Bank (9 percent), and JPMorgan Chase Bank (5.4 percent). As of December 31, 2016, Bank of America operated 572 full-service financial centers and 1,637 deposit-taking ATMs in the state.

A bank's deposit volume serves as an indicator of its capacity to lend and invest in its assessment areas; however, not all deposits originate within the local community. In the Jacksonville, FL MSA, Bank of America reported an additional \$3 billion in deposits of national corporations. The funds for these large national corporations originated from communities across the nation and deposited in financial centers near the headquarters of those corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

²¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the community profiles for the state of Florida in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Florida

Examiners selected three assessment areas for full-scope reviews and the remaining 19 assessment areas for limited-scope reviews. The full-scope assessment areas are Miami-Fort Lauderdale-West Palm Beach, FL MSA, Jacksonville, FL MSA, and North Port-Sarasota-Bradenton, FL MSA. Examiners based their conclusions on activities within all assessment areas. Examiners interviewed five community based organizations and local government agencies serving various housing, employment, and community service needs. The organizations identified affordable housing, financial literacy, and financing programs for applicants with weak credit as some of the most pressing needs.

During the evaluation period, Bank of America originated or purchased 103,230 home mortgage loans totaling \$21.3 billion, 255,015 small loans to businesses totaling \$6.8 billion, 1,574 small loans to farms totaling \$21.1 million, and 139 CD loans totaling \$683.6 million. Lending volumes include loans originated or purchased in the following counties, which the bank no longer designates as assessment areas due to the bank's closure or sale of all financial centers or deposit-taking ATMs: Calhoun, Columbia, Dixie, Hamilton, and Suwannee counties. These counties were previously part of the Florida Non-MSA assessment area. Small loans to businesses represented nearly 71 percent of the loan volume; therefore, examiners weighted small loans to businesses more than home mortgage loans. Small loans to farms represented less than 1 percent of the loan volume and thus examiners weighted them very little in the overall Lending Test performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Florida is rated Outstanding, based on excellent lending activity, good geographic and borrower income distributions, and a relatively high level of CD lending that positively affected overall performance under the Lending Test. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Florida is excellent. Lending activity is excellent in the Jacksonville, FL MSA, North Port-Sarasota-Bradenton, FL MSA, and Miami-Fort Lauderdale-West Palm Beach, FL MSA. Performance in the Miami-Fort Lauderdale-West Palm Beach, FL MSA carried the most weight in arriving at

the good performance overall. Lending activity in limited-scope areas is consistent with the excellent performance.

Jacksonville, FL MSA

Lending activity in the Jacksonville, FL MSA is excellent. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 41 percent. The bank ranks first among 35 depository financial institutions in the assessment area, which places it in the top 3 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.9 percent based on the number of home mortgage loans originated or purchased. The bank ranks 12th among 674 home mortgage lenders in the assessment area, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has a 10 percent market share based on the number of small loans to businesses originated or purchased. The bank ranks third among 133 small business lenders, which places it in the top 3 percent of lenders. According to peer small farm data for 2016, the bank has a 14.1 percent market share based on the number of small loans to farms originated or purchased. The bank ranks second among 16 farm lenders, which places it in the top 13 percent of lenders. Considering the higher ranking for home mortgage loans and ranking for small loans to businesses relative to its ranking for deposits, lending activity is excellent.

Miami-Fort Lauderdale-West Palm Beach, FL MSA

Lending activity in the Miami-For Lauderdale-West Palm Beach, FL MSA is excellent. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 16.7 percent. The bank ranks second among 97 depository financial institutions in the assessment area, which places it in the top 3 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.4 percent based on the number of home mortgage loans originated or purchased. The bank ranks ninth among 997 home mortgage lenders in the assessment area, which places it in the top 1 percent of lenders. According to peer small business data for 2016, the bank has a 13 percent market share based on the number of small loans to businesses originated or purchased. The bank ranks third among 236 small business lenders, which places it in the top 2 percent of lenders. According to peer small farm data for 2016, the bank has a 32.7 percent market share based on the number of small loans to farms originated or purchased. The bank ranks first among 24 farm lenders, which places it in the top 5 percent of lenders. Considering the higher ranking for home mortgage loans and small loans to businesses relative to its ranking for deposits, lending activity is excellent.

North Port-Sarasota-Bradenton, FL MSA

Lending activity in the North Port-Sarasota-Bradenton, FL MSA is excellent. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 19.9 percent. The bank ranks first among 40 depository financial institutions, placing it in the top 3 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.7 percent based on the number of home mortgage loans originated or purchased. The bank ranks fourth among 783 home mortgage lenders, which places it in the top 1 percent of lenders. According to peer small business data for 2016, the bank has a 12.2 percent market share based on the number of small loans to businesses originated or purchased. The bank ranks third among 135 small business lenders, which places it in the top 3 percent of lenders.

According to peer small farm data for 2016, the bank has a 29.6 percent market share based on the number of small loans to farms originated or purchased. The bank ranks first among 18 farm lenders, which places it in the top 6 percent of lenders. Considering the higher ranking for home mortgage loans and ranking for small loans to businesses relative to its ranking for deposits, lending activity is excellent.

LENDING VOLUME		Geography: FLORIDA						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Jacksonville, FL	5.80	8,832	1,757,817	11,971	364,574	62	534	5	15,373	20,870	2,138,298	23.28
Miami, FL	40.10	25,894	7,053,842	117,949	3,220,487	453	5,933	65	299,122	144,361	10,579,384	35.92
North Port, FL	4.72	5,417	1,132,665	11,489	232,622	79	991	7	18,374	16,992	1,384,652	3.74
Limited Review												
Cape Coral, FL	3.31	4,105	766,589	7,754	174,662	65	413	3	14,638	11,927	956,302	2.11
Crestview, FL	0.87	1,622	368,809	1,508	33,998	13	98	0	0	3,143	402,905	0.39
Deltona, FL	2.56	3,690	532,289	5,468	110,440	50	587	4	27,915	9,212	671,231	1.94
Gainesville, FL	1.10	1,459	230,110	2,473	79,848	38	655	2	2,688	3,972	313,301	0.90
Homosassa Springs, FL	0.30	348	42,926	712	14,318	13	127	0	0	1,073	57,371	0.42
Lakeland, FL	1.72	2,684	382,704	3,467	115,501	36	901	2	2,610	6,189	501,716	0.98
Naples, FL	2.02	2,279	913,373	4,927	129,706	48	444	0	0	7,254	1,043,523	1.60
Ocala, FL	1.20	1,654	197,248	2,572	73,348	84	570	0	0	4,310	271,166	0.81
Orlando, FL	10.67	11,896	2,151,067	26,373	729,658	122	2,254	16	96,255	38,407	2,979,234	9.19
Palm Bay, FL	2.32	3,527	572,726	4,775	123,112	32	1,469	2	3,510	8,336	700,817	1.48
Palm Coast, FL	0.27	615	90,331	339	5,271	6	71	0	0	960	95,673	0.00
Pensacola, FL	1.33	2,453	387,324	2,322	58,986	22	264	5	42,099	4,802	488,673	0.61
Port St. Lucie, FL	2.03	2,593	448,033	4,673	96,852	55	595	4	14,486	7,325	559,966	1.20
Punta Gorda, FL	0.81	1,334	197,345	1,549	35,823	15	185	2	13,750	2,900	247,103	0.67
Sebastian, FL	0.67	861	229,251	1,536	47,420	24	325	0	0	2,421	276,996	0.70
Sebring, FL	0.13	137	18,943	328	7,126	20	236	0	0	485	26,305	0.21
Tallahassee, FL	0.97	1,368	237,211	2,096	54,659	18	218	0	0	3,482	292,088	0.75
Tampa, FL	15.14	17,609	2,991,418	36,695	1,057,375	177	2,368	22	132,778	54,503	4,183,939	12.34
The Villages, FL	0.18	284	51,914	349	10,336	13	575	0	0	646	62,825	0.11
Florida Non-MSA	1.77	2,569	536,606	3,690	69,366	129	1,241	0	0	6,388	607,213	0.65
FLORIDA	100.00	103,230	21,290,541	255,015	6,845,488	1,574	21,054	139	683,596	359,958	28,840,679	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is adequate. The distribution is adequate in the Jacksonville, FL MSA, Miami-Fort Lauderdale-West Palm Beach, FL MSA, and North Port-Sarasota-Bradenton, FL MSA.

Jacksonville, FL MSA

The geographic distribution of home mortgage loans in the Jacksonville, FL MSA is adequate. Performance is adequate in low-income geographies and adequate in moderate-income geographies. At 1.4 percent, the distribution of the bank's home mortgage loans in low-income geographies is lower than the 2.9 percent of owner-occupied housing units in low-income geographies; however, the bank's distribution is higher than the 0.8 percent for aggregate lenders. At 9.8 percent, the distribution in moderate-income geographies is also lower than the 15.6 percent of owner-occupied housing units in moderate-income geographies and it is similar to the 9.9 percent for aggregate lenders.

Miami-Fort Lauderdale-West Palm Beach, FL MSA

The geographic distribution of home mortgage loans in the Miami-Fort Lauderdale-West Palm Beach, FL MSA is adequate. Performance is adequate in low-income geographies and adequate in moderate-income geographies. At 1 percent, the distribution in low-income geographies is lower than the 2.1 percent of owner-occupied housing units in low-income geographies and lower than the 1.2 percent for aggregate lenders. At 14.3 percent, the distribution in moderate-income geographies is lower than the 23.1 percent of owner-occupied housing units in moderate-income geographies and it is slightly lower than the 16.8 percent for aggregate lenders.

North Port-Sarasota-Bradenton, FL MSA

The geographic distribution of home mortgage loans in the North Port-Sarasota-Bradenton, FL MSA is adequate. Performance is adequate in low-income geographies and adequate in moderate-income geographies. At 0.4 percent, the distribution in low-income geographies is lower than the 1.3 percent of owner-occupied housing units in low-income geographies, but comparable to the 0.4 percent for aggregate lenders. At 11.7 percent, the distribution in moderate-income geographies is lower than the 20.1 percent of owner-occupied housing units in moderate-income geographies and lower than the 12.2 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Jacksonville FL MSA	2,998	647,728	8.1	55,232	2.9	1.4	0.8	15.6	9.8	9.9	47.9	43.3	48.2	33.6	45.5	41.1	0.0	0.0	0.0
FS Miami-Fort Lauderdale-West Palm Beach FL MSA	9,615	3,193,359	25.9	145,423	2.1	1.0	1.2	23.1	14.3	16.8	36.3	32.3	36.9	38.6	52.4	45.0	0.0	0.0	0.1
FS North Port-Sarasota-Bradenton FL MSA	2,228	529,623	6.0	30,116	1.3	0.4	0.4	20.1	11.7	12.2	49.0	45.6	50.6	29.7	42.4	36.8	0.0	0.0	0.0
LS Cape Coral-Fort Myers FL MSA	1,527	317,526	4.1	28,289	1.3	0.3	1.3	14.2	9.3	12.3	55.6	52.3	55.5	28.9	38.1	30.9	0.0	0.0	0.0
LS Crestview - Fort Walton Beach-Destin FL MSA	633	186,840	1.7	13,244	0.0	0.0	0.0	16.6	8.5	7.7	57.7	52.6	55.3	25.7	38.9	36.9	0.0	0.0	0.0
LS Deltona-Daytona Beach-Ormond Beach FL MSA	1,552	234,396	4.2	22,254	1.1	0.4	0.3	14.0	9.5	10.8	58.3	54.5	57.6	26.6	35.6	31.3	0.0	0.0	0.0
LS Florida Non-MSA	386	134,498	1.0	4,802	0.0	0.0	0.0	20.4	9.3	12.3	47.7	33.2	33.8	32.0	57.5	53.9	0.0	0.0	0.0
LS Gainesville FL MSA	510	85,092	1.4	6,191	4.7	2.7	3.9	19.7	12.4	13.3	30.5	27.1	29.9	45.1	57.8	52.9	0.0	0.0	0.0
LS Homosassa Springs FL MSA	348	42,926	0.9	4,164	0.0	0.0	0.0	8.1	6.0	7.4	75.5	72.1	70.6	16.4	21.8	22.1	0.0	0.0	0.0
LS Lakeland-Winter Haven FL MSA	893	144,537	2.4	19,662	1.3	0.6	0.4	19.2	13.2	14.3	54.7	54.8	55.4	24.9	31.5	29.9	0.0	0.0	0.0
LS Naples-Immokalee-Marco Island FL MSA	983	503,045	2.6	14,107	2.4	1.7	1.8	16.4	14.5	13.6	46.0	39.9	54.8	35.2	43.8	29.8	0.0	0.0	0.0
LS Ocala FL MSA	516	59,718	1.4	9,526	0.0	0.0	0.0	13.0	9.9	9.4	73.1	74.2	75.4	13.9	15.9	15.2	0.0	0.0	0.0
LS Orlando-Kissimmee-Sanford FL MSA	4,115	777,559	11.1	81,146	0.5	0.3	0.2	20.0	14.2	15.5	43.8	43.2	44.3	35.7	42.3	39.9	0.0	0.0	0.0
LS Palm Bay-Melbourne-Titusville FL MSA	1,153	215,189	3.1	22,135	1.2	1.1	0.5	18.8	13.3	14.4	46.9	43.5	46.9	33.1	42.2	38.1	0.0	0.0	0.0
LS Pensacola-Ferry Pass-Brent FL MSA	785	112,058	2.1	16,838	1.0	0.1	0.2	17.9	13.1	9.5	49.8	47.8	47.9	31.3	39.0	42.4	0.0	0.0	0.0
LS Port St Lucie FL MSA	956	171,668	2.6	16,858	1.0	0.2	0.2	14.7	7.3	7.4	57.5	58.4	64.0	26.8	34.1	28.4	0.0	0.0	0.0
LS Punta Gorda FL MSA	468	73,196	1.3	6,979	0.0	0.0	0.0	6.3	3.4	4.9	76.5	72.7	79.2	17.3	23.9	15.8	0.0	0.0	0.0
LS Sebastian-Vero Beach FL MSA	330	105,583	0.9	5,035	1.1	0.0	0.6	11.9	5.8	8.6	58.7	52.7	65.0	28.3	41.5	25.8	0.0	0.0	0.0
LS Sebring FL MSA	137	18,943	0.4	2,067	0.0	0.0	0.0	7.2	3.7	3.7	80.1	70.8	75.4	12.7	25.5	20.9	0.0	0.0	0.0
LS Tallahassee FL MSA	573	110,575	1.5	9,261	3.3	3.5	3.1	24.8	18.2	15.7	37.1	31.1	35.9	34.8	47.3	45.3	0.0	0.0	0.0
LS Tampa-St Petersburg-Clearwater FL MSA	6,186	1,130,333	16.6	102,154	1.8	1.3	1.3	22.2	14.5	15.3	43.8	42.2	42.9	32.2	41.9	40.5	0.0	0.0	0.0
LS The Villages FL MSA	284	51,914	0.8	4,666	0.9	0.0	0.2	15.7	25.4	37.4	58.7	23.2	25.6	24.7	51.4	36.9	0.0	0.0	0.0
Total	37,176	8,846,306	100.0	620,149	1.6	0.9	0.9	19.5	12.7	13.9	46.1	42.6	46.4	32.8	43.8	38.9	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The distribution is good in the Jacksonville, FL MSA, excellent in the Miami-Fort Lauderdale-West Palm Beach, FL MSA, and good in the North Port-Sarasota-Bradenton, FL MSA.

Jacksonville, FL MSA

The geographic distribution of small loans to businesses in the Jacksonville, FL MSA is good. Performance is adequate in low-income geographies and good in moderate-income geographies. At 2.3 percent, the distribution in low-income geographies is lower than the 3.4 percent of businesses in low-income geographies and lower than the 3.1 percent for aggregate lenders. At 17.1 percent, the distribution in moderate-income geographies is lower than the 19.3 percent of businesses in moderate-income geographies and comparable with the 17.3 percent for aggregate lenders. In the Jacksonville, FL MSA, competition for small business banking is strong, with American Express and Citibank owning a majority of market share at 21.5 percent and 17.1 percent, respectively. Additionally, there are 17 low-income census tracts in the Jacksonville, FL MSA; however, Bank of America only has two financial centers in low-income census tracts, limiting the ability to lend in these geographies.

Miami-Fort Lauderdale-West Palm Beach, FL MSA

The geographic distribution of small loans to businesses in the Miami-Fort Lauderdale-West Palm Beach, FL MSA is excellent. Performance is excellent in low-income geographies and excellent in moderate-income geographies. At 3.1 percent, the distribution in low-income geographies is comparable to the 3.3 percent of businesses in low-income geographies and it is comparable to the 3.2 percent for aggregate lenders. At 21.6 percent, the distribution in moderate-income geographies is comparable to the 21.9 percent of businesses in moderate-income geographies and higher than the 20.5 percent for aggregate lenders.

North Port-Sarasota-Bradenton, FL MSA

The geographic distribution of small loans to businesses in the North Port-Sarasota-Bradenton, FL MSA is good. Performance is excellent in low-income geographies and good in moderate-income geographies. At 1.5 percent, the distribution in low-income geographies is comparable with the 1.5 percent of businesses in low-income geographies and it is slightly higher than the 1.3 percent performance for aggregate lenders. The distribution in moderate-income geographies at 17.7 percent is slightly lower than the 20.3 percent of businesses in moderate-income geographies and it is slightly lower than the 18.7 percent performance for aggregate lenders. Competition for small business banking is strong within the North Port-Sarasota-Bradenton, FL MSA, with American Express and Citibank owning a majority of market share at 19.8 percent and 17.1 percent, respectively.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate
FS Jacksonville FL MSA	7,992	228,809	4.7	31,327	3.4	2.3	3.1	19.3	17.1	17.3	42.8	39.2	40.0	34.5	41.4	39.5	0.0	0.0	0.0
FS Miami-Fort Lauderdale-West Palm Beach FL MSA	80,820	2,016,980	47.4	242,848	3.3	3.1	3.2	21.9	21.6	20.5	30.3	29.5	28.5	43.6	45.0	46.8	0.8	0.9	0.9
FS North Port-Sarasota-Bradenton FL MSA	7,511	147,382	4.4	22,839	1.5	1.5	1.3	20.3	17.7	18.7	42.8	41.7	40.1	35.3	39.1	39.8	0.0	0.0	0.0
LS Cape Coral-Fort Myers FL MSA	5,182	109,747	3.0	20,877	3.5	3.5	3.0	14.7	14.0	12.3	51.8	50.4	47.7	29.9	32.1	36.9	0.1	0.0	0.0
LS Crestview -Fort Walton Beach-Destin FL MSA	1,027	22,929	0.6	6,473	0.0	0.0	0.0	15.0	12.9	13.6	54.4	50.5	51.3	30.6	36.6	35.1	0.0	0.0	0.0
LS Deltona-Daytona Beach-Ormond Beach FL MSA	3,720	72,038	2.2	12,984	2.8	2.1	3.1	18.8	15.6	18.6	50.7	49.3	47.3	27.7	33.0	30.9	0.0	0.0	0.0
LS Gainesville FL MSA	1,533	48,715	0.9	4,717	10.3	9.8	8.7	20.2	16.4	20.5	28.8	29.0	28.2	40.7	44.7	42.6	0.0	0.0	0.0
LS Homosassa Springs FL MSA	712	14,318	0.4	2,835	0.0	0.0	0.0	8.8	9.4	9.9	75.3	72.2	72.6	15.9	18.4	17.5	0.0	0.0	0.0
LS Lakeland-Winter Haven FL MSA	2,260	76,685	1.3	10,175	4.7	4.2	4.9	19.5	18.5	20.1	49.8	50.5	49.9	26.0	26.9	25.1	0.0	0.0	0.0
LS Naples-Immokalee-Marco Island FL MSA	3,341	83,752	2.0	15,717	2.6	3.9	1.7	13.3	13.3	11.0	42.2	42.9	42.3	41.8	39.8	45.0	0.0	0.0	0.0
LS Ocala FL MSA	1,637	46,644	1.0	5,942	0.0	0.0	0.0	17.9	16.0	18.1	55.0	52.8	52.8	27.1	31.2	29.1	0.0	0.0	0.0
LS Orlando-Kissimmee-Sanford FL MSA	17,803	480,677	10.4	62,740	0.6	0.5	0.6	23.5	21.2	21.0	38.6	38.7	36.7	37.3	39.6	41.7	0.0	0.0	0.0
LS Palm Bay-Melbourne-Titusville FL MSA	2,975	79,066	1.7	11,299	1.8	1.4	1.7	22.3	19.3	23.3	41.9	40.5	39.9	33.9	38.8	35.0	0.0	0.0	0.0
LS Pensacola-Ferry Pass-Brent FL MSA	1,464	29,348	0.9	8,019	2.2	2.3	3.4	24.5	21.1	24.9	44.1	40.9	40.7	29.1	35.7	31.0	0.0	0.0	0.0
LS Port St Lucie FL MSA	3,095	58,482	1.8	11,518	1.8	1.1	1.5	18.7	16.0	19.3	52.7	50.9	48.0	26.8	31.7	31.0	0.1	0.4	0.2
LS Punta Gorda FL MSA	977	20,104	0.6	4,120	0.0	0.0	0.0	6.6	7.8	5.8	79.0	77.1	79.1	14.4	15.1	15.2	0.0	0.0	0.0
LS Sebastian-Vero Beach FL MSA	962	30,887	0.6	4,033	4.8	6.9	7.2	8.8	8.3	8.8	56.0	54.5	53.8	30.2	29.8	29.6	0.2	0.5	0.6
LS Sebring FL MSA	328	7,126	0.2	1,475	0.0	0.0	0.0	8.3	7.3	10.0	74.2	75.3	72.8	17.1	13.1	16.5	0.4	4.3	0.7
LS Tallahassee FL MSA	1,305	28,957	0.8	7,281	6.7	6.2	5.6	25.3	22.3	24.1	33.8	32.0	30.2	33.9	38.9	39.7	0.4	0.7	0.4
LS Tampa-St Petersburg-Clearwater FL MSA	24,036	647,472	14.1	74,386	2.8	2.8	3.3	21.3	19.3	20.7	38.9	38.6	38.4	36.9	39.2	37.6	0.1	0.1	0.1
LS The Villages FL MSA	349	10,336	0.2	1,698	1.7	2.0	2.2	18.9	21.8	29.4	48.9	39.0	38.2	30.5	37.2	30.2	0.0	0.0	0.0
LS Florida Non-MSA	1,546	22,727	0.9	6,110	0.0	0.0	0.0	16.4	9.8	13.1	35.9	30.7	34.1	47.6	59.4	52.7	0.1	0.2	0.0
Total	170,575	4,283,181	100.0	569,413	2.7	2.6	2.7	20.6	19.6	19.4	38.8	36.1	36.0	37.5	41.2	41.4	0.3	0.5	0.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is adequate. The distribution is poor in the Jacksonville, FL MSA, adequate in the Miami-Fort Lauderdale-West Palm Beach, FL MSA, and good in the North Port-Sarasota-Bradenton, FL MSA.

Jacksonville, FL MSA

The geographic distribution of small loans to farms in the Jacksonville, FL MSA is poor. Performance is very poor in low-income geographies and adequate in moderate-income geographies. At 0 percent, the proportion of loans in low-income geographies is lower than the 2.5 percent of farms in low-income geographies and lower than the 1.2 percent for aggregate lenders. At 10 percent, the proportion of loans in moderate-income geographies is lower than the 15.4 percent of farms in moderate-income geographies and lower than the 12 percent for aggregate lenders.

Miami-Fort Lauderdale-West Palm Beach, FL MSA

The geographic distribution of small loans to farms in the Miami-Fort Lauderdale-West Palm Beach, FL MSA is adequate. Performance is good in low-income geographies and poor in moderate-income geographies. At 2.2 percent, the proportion of loans in low-income geographies is lower than the 3.1 percent of farms in low-income geographies and comparable to the 2.3 percent for aggregate lenders. At 9.5 percent, the distribution in moderate-income geographies is lower than the 22.8 percent of farms in moderate-income geographies and it is lower than the 13.1 percent for aggregate lenders.

North Port-Sarasota-Bradenton, FL MSA

The geographic distribution of small loans to farms in North Port-Sarasota-Bradenton, FL MSA is good. Performance is poor in low-income geographies and excellent in moderate-income geographies. At 0 percent, the proportion of loans in low-income geographies is lower than the 1.7 percent of farms in low-income geographies, but is consistent with the 0 percent for aggregate lenders. At 17.9 percent, the proportion in moderate-income geographies is consistent with the 17.9 percent of farms in moderate-income geographies, but is slightly lower than the 18.3 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Jacksonville FL MSA	41	381	4.4	83	2.5	0.0	1.2	15.4	10.0	12.0	51.3	48.8	45.8	30.8	43.9	41.0	0.0	0.0	0.0
FS Miami-Fort Lauderdale-West Palm Beach FL MSA	306	4,004	30.4	351	3.1	2.2	2.3	22.8	9.5	13.1	31.6	29.7	20.5	42.3	60.1	63.8	0.3	0.0	0.3
FS North Port-Sarasota-Bradenton FL MSA	55	759	5.8	71	1.7	0.0	0.0	17.9	17.9	18.3	47.0	32.7	45.1	33.4	54.5	36.6	0.0	0.0	0.0
LS Cape Coral-Fort Myers FL MSA	40	295	4.0	49	1.5	0.0	0.0	17.7	8.3	8.2	56.0	42.5	46.9	24.9	55.0	44.9	0.1	0.0	0.0
LS Crestview-Fort Walton Beach-Destin FL MSA	10	78	1.0	23	0.0	0.0	0.0	19.3	0.0	30.4	61.8	70.0	60.9	18.9	30.0	8.7	0.0	0.0	0.0
LS Deltona-Daytona Beach-Ormond Beach FL MSA	28	448	3.1	41	1.2	9.5	2.4	16.3	14.3	12.2	55.9	35.7	51.2	26.6	46.4	34.1	0.0	0.0	0.0
LS Gainesville FL MSA	23	542	2.8	107	3.2	0.0	0.0	18.6	11.1	32.7	43.7	52.2	41.1	34.5	39.1	26.2	0.0	0.0	0.0
LS Homosassa Springs FL MSA	12	124	1.7	16	0.0	0.0	0.0	12.8	16.7	12.5	69.5	75.0	87.5	17.7	28.6	0.0	0.0	0.0	0.0
LS Lakeland-Winter Haven FL MSA	19	208	1.9	64	2.3	0.0	1.6	20.5	16.7	26.6	51.4	52.6	43.8	25.8	36.8	28.1	0.0	0.0	0.0
LS Naples-Immokalee-Marco Island FL MSA	36	351	4.1	31	6.5	55.6	19.4	18.6	22.2	29.0	49.0	21.7	22.6	25.9	10.7	29.0	0.0	0.0	0.0
LS Ocala FL MSA	49	369	4.9	73	0.0	0.0	0.0	15.0	24.5	8.2	60.3	49.0	57.5	24.7	26.5	34.2	0.0	0.0	0.0
LS Orlando-Kissimmee-Sanford FL MSA	71	908	7.1	161	0.6	0.0	0.0	19.9	8.5	13.0	46.0	59.2	50.3	33.4	32.4	36.6	0.1	0.0	0.0
LS Palm Bay-Melbourne-Titusville FL MSA	24	912	2.4	31	1.5	0.0	0.0	22.6	15.4	19.4	45.2	16.7	32.3	30.7	75.0	48.4	0.0	0.0	0.0
LS Pensacola-Ferry Pass-Brent FL MSA	19	238	2.2	48	1.5	0.0	0.0	16.9	12.5	10.4	53.8	78.9	83.3	27.8	15.8	6.3	0.0	0.0	0.0
LS Port St Lucie FL MSA	40	472	4.0	53	1.4	0.0	0.0	21.9	15.0	30.2	51.3	40.0	34.0	25.4	45.0	35.8	0.0	0.0	0.0
LS Punta Gorda FL MSA	12	172	1.2	9	0.0	0.0	0.0	7.3	0.0	0.0	75.2	41.7	33.3	17.4	58.3	66.7	0.0	0.0	0.0
LS Sebastian-Vero Beach FL MSA	13	251	1.7	28	2.2	0.0	0.0	16.7	25.0	21.4	62.6	25.0	46.4	18.3	53.8	32.1	0.2	0.0	0.0
LS Sebring FL MSA	20	236	2.0	26	0.0	0.0	0.0	6.3	0.0	0.0	73.5	85.0	84.6	19.3	23.1	11.5	0.9	0.0	3.8
LS Tallahassee FL MSA	11	162	1.2	57	2.4	0.0	0.0	27.6	37.5	47.4	38.2	54.5	31.6	31.8	50.0	21.1	0.0	0.0	0.0
LS Tampa-St Petersburg-Clearwater FL MSA	115	1,737	11.5	152	2.1	3.8	2.6	22.5	10.4	17.8	43.5	40.9	40.8	31.9	46.1	38.8	0.0	0.0	0.0
LS The Villages FL MSA	13	575	1.5	11	0.8	0.0	0.0	22.5	23.1	27.3	68.0	61.5	54.5	8.8	20.0	18.2	0.0	0.0	0.0
LS Florida Non-MSA	48	645	4.8	95	0.0	0.0	0.0	20.6	14.6	16.8	49.5	43.8	62.1	29.8	41.7	21.1	0.0	0.0	0.0
Total	1,006	13,870	100.0	1,580	1.9	2.7	1.3	19.9	11.1	17.8	46.1	40.5	42.2	31.9	45.7	38.5	0.1	0.0	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the "Inside/Outside Ratio" section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Jacksonville, FL MSA, adequate in the Miami-Fort Lauderdale-West Palm Beach, FL MSA, and adequate in the North Port-Sarasota-Bradenton, FL MSA.

Jacksonville, FL MSA

The distribution of home mortgage loans by borrower income in the Jacksonville, FL MSA is good. The distribution is adequate for low-income borrowers and good for moderate-income borrowers. At 8.4 percent, the proportion of the bank's home mortgage loans to low-income borrowers is lower than the 20.6 percent of low-income families, but higher than the 5 percent for aggregate lenders. At 15.3 percent, the proportion of loans to moderate-income borrowers is lower than the 17.7 percent of moderate-income families, but higher than the 14.8 percent for aggregate lenders.

Miami-Fort Lauderdale-West Palm Beach, FL MSA

The distribution of home mortgage loans by borrower income in the Miami-Fort Lauderdale-West Palm Beach, FL MSA is adequate. The distribution is adequate for low-income borrowers and adequate for moderate-income borrowers. At 5.7 percent, the proportion of the bank's home mortgage loans to low-income borrowers is lower than the 22.4 percent of low-income families, but higher than the 2.2 percent for aggregate lenders. At 9.4 percent, the proportion of loans to moderate-income borrowers is lower than the 17.3 percent of moderate-income families and it is consistent with the 9.6 percent for aggregate lenders.

North Port-Sarasota-Bradenton, FL MSA

The distribution of home mortgage loans by borrower income in the North Port-Sarasota-Bradenton, FL MSA is adequate. The distribution is adequate for low-income borrowers and adequate for moderate-income borrowers. At 8.6 percent, the proportion of the bank's home mortgage loans to low-income borrowers is lower than the 19.6 percent of low-income families, but higher than the 3.7 percent for aggregate lenders. The proportion of loans to moderate-income borrowers at 12.8 percent is lower than the 19.0 percent of moderate-income families and less than the 14.1 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Jacksonville FL MSA	2,998	647,728	8.1	55,232	20.6	8.4	5.0	17.7	13.7	14.8	21.9	16.4	20.5	39.9	40.7	39.1	0.0	20.8	20.6
FS Miami-Fort Lauderdale-West Palm Beach FL MSA	9,615	3,193,359	25.9	145,423	22.4	5.7	2.2	17.3	9.4	9.6	18.9	15.3	17.6	41.3	58.6	53.7	0.0	10.9	16.8
FS North Port-Sarasota-Bradenton FL MSA	2,228	529,623	6.0	30,116	19.6	8.6	3.7	19.0	12.8	14.1	20.9	18.1	20.4	40.5	53.5	49.8	0.0	7.0	12.0
LS Cape Coral-Fort Myers FL MSA	1,527	317,526	4.1	28,289	19.0	10.3	3.3	19.0	13.8	13.7	21.4	16.3	19.1	40.7	52.7	48.9	0.0	7.0	15.0
LS Crestview - Fort Walton Beach-Destin FL MSA	633	186,840	1.7	13,244	19.6	5.7	3.3	18.0	11.8	11.4	23.0	17.7	17.3	39.5	47.9	46.8	0.0	16.9	21.2
LS Deltona-Daytona Beach-Ormond Beach FL MSA	1,552	234,396	4.2	22,254	19.7	9.5	3.9	18.2	14.0	14.7	22.0	18.6	21.0	40.1	48.3	42.5	0.0	9.7	17.9
LS Florida Non-MSA	386	134,498	1.0	4,802	20.2	6.7	2.0	17.3	6.7	6.2	18.9	10.1	11.8	43.6	65.5	64.4	0.0	10.9	15.5
LS Gainesville FL MSA	510	85,092	1.4	6,191	23.8	7.6	3.7	17.2	14.1	13.1	18.0	21.8	19.4	41.0	46.1	45.3	0.0	10.4	18.5
LS Homosassa Springs FL MSA	348	42,926	0.9	4,164	17.5	10.1	7.4	20.5	16.4	18.5	21.4	19.8	21.2	40.6	43.1	36.5	0.0	10.6	16.5
LS Lakeland-Winter Haven FL MSA	893	144,537	2.4	19,662	20.3	8.4	3.3	18.6	18.0	15.0	20.8	21.8	22.6	40.3	38.7	37.9	0.0	13.0	21.2
LS Naples-Immokalee-Marco Island FL MSA	983	503,045	2.6	14,107	21.1	4.4	1.9	18.3	10.0	10.4	19.0	8.6	16.3	41.5	69.0	57.0	0.0	8.0	14.4
LS Ocala FL MSA	516	59,718	1.4	9,526	18.1	14.0	4.0	19.8	17.8	14.5	22.8	18.8	21.6	39.3	36.8	40.6	0.0	12.6	19.3
LS Orlando-Kissimmee-Sanford FL MSA	4,115	777,559	11.1	81,146	20.1	8.0	3.4	18.6	15.1	13.4	20.8	18.4	19.7	40.5	49.2	46.1	0.0	9.3	17.4
LS Palm Bay-Melbourne-Titusville FL MSA	1,153	215,189	3.1	22,135	19.4	15.0	5.1	18.8	18.4	14.6	21.5	16.6	19.1	40.4	40.5	43.1	0.0	9.5	18.1
LS Pensacola-Ferry Pass-Brent FL MSA	785	112,058	2.1	16,838	21.1	8.8	4.4	17.6	17.8	14.0	20.8	20.5	20.8	40.4	33.5	39.1	0.0	19.4	21.6
LS Port St Lucie FL MSA	956	171,668	2.6	16,858	18.6	8.8	3.5	20.1	12.0	13.8	20.3	19.1	20.9	41.0	51.8	44.0	0.0	8.3	17.8
LS Punta Gorda FL MSA	468	73,196	1.3	6,979	16.4	11.3	3.9	19.6	17.5	13.8	25.3	17.5	20.9	38.6	47.0	47.8	0.0	6.6	13.6
LS Sebastian-Vero Beach FL MSA	330	105,583	0.9	5,035	20.3	6.7	3.3	17.0	13.9	12.8	22.0	13.6	18.4	40.7	61.5	50.3	0.0	4.2	15.3
LS Sebring FL MSA	137	18,943	0.4	2,067	15.6	10.9	4.0	21.3	12.4	12.3	24.0	20.4	18.6	39.1	44.5	42.9	0.0	11.7	22.2
LS Tallahassee FL MSA	573	110,575	1.5	9,261	23.5	8.0	6.3	16.2	16.4	16.7	19.1	21.1	20.2	41.2	44.5	39.5	0.0	9.9	17.3
LS Tampa-St Petersburg-Clearwater FL MSA	6,186	1,130,333	16.6	102,154	20.7	10.0	4.1	18.5	15.0	14.2	19.7	18.3	19.7	41.0	44.6	43.5	0.0	12.1	18.5
LS The Villages FL MSA	284	51,914	0.8	4,666	17.5	7.7	4.4	19.5	11.3	13.2	23.8	22.5	21.5	39.2	53.9	51.8	0.0	4.6	9.2
Total	37,176	8,846,306	100.0	620,149	20.8	8.2	3.5	18.2	13.2	12.9	20.3	17.2	19.3	40.8	50.2	46.6	0.0	11.3	17.6

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank's originations/purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The distribution is good in the Jacksonville, FL MSA, Miami-Fort Lauderdale-West Palm Beach, FL MSA, and North Port-Sarasota-Bradenton, FL MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 27.4 percent of its small loans to businesses.

Jacksonville, FL MSA

The distribution of small loans to businesses by revenue within the Jacksonville FL MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 60 percent is lower than the 79.7 percent of businesses with gross annual revenues of \$1 million or less. The bank's distribution is significantly higher than the 48 percent for aggregate lenders.

Miami-Fort Lauderdale-West Palm Beach, FL MSA

The distribution of small loans to businesses by revenue within the Miami-Fort Lauderdale-West Palm Beach, FL MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 62.5 percent is lower than the 80.8 percent of businesses with gross annual revenues of \$1 million or less. The bank's distribution is significantly higher than the 48.5 percent for aggregate lenders.

North Port-Sarasota-Bradenton, FL MSA

The distribution of small loans to businesses by revenue within the North Port-Sarasota-Bradenton, FL MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 63.3 percent is lower than the 82.1 percent of businesses with gross annual revenues of \$1 million or less. The bank's distribution is significantly higher than the 49.1 percent for aggregate lenders.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Jacksonville FL MSA	7,992	228,809	4.7	31,327	79.7	60.0	48.0	3.5	12.1	16.8	27.9
FS Miami-Fort Lauderdale-West Palm Beach FL MSA	80,820	2,016,980	47.4	242,848	80.8	62.5	48.5	3.3	11.1	15.9	26.4
FS North Port-Sarasota-Bradenton FL MSA	7,511	147,382	4.4	22,839	82.1	63.3	49.1	2.9	8.8	15.0	28.0
LS Cape Coral-Fort Myers FL MSA	5,182	109,747	3.0	20,877	81.6	61.8	44.2	3.0	9.9	15.4	28.3
LS Crestview -Fort Walton Beach-Destin FL MSA	1,027	22,929	0.6	6,473	80.9	61.3	46.0	2.8	9.9	16.3	28.7
LS Deltona-Daytona Beach-Ormond Beach FL MSA	3,720	72,038	2.2	12,984	82.3	62.1	53.3	2.5	8.1	15.2	29.8
LS Gainesville FL MSA	1,533	48,715	0.9	4,717	78.5	56.6	50.6	3.5	13.2	17.9	30.1
LS Homosassa Springs FL MSA	712	14,318	0.4	2,835	83.5	60.4	53.9	2.4	9.4	14.1	30.2
LS Lakeland-Winter Haven FL MSA	2,260	76,685	1.3	10,175	80.7	57.2	46.5	3.0	14.5	16.3	28.3
LS Naples-Immokalee-Marco Island FL MSA	3,341	83,752	2.0	15,717	81.2	63.1	42.4	3.0	9.8	15.8	27.1
LS Ocala FL MSA	1,637	46,644	1.0	5,942	82.0	58.1	49.9	3.0	12.9	15.0	29.0
LS Orlando-Kissimmee-Sanford FL MSA	17,803	480,677	10.4	62,740	80.9	61.2	47.4	3.1	11.8	16.0	27.0
LS Palm Bay-Melbourne-Titusville FL MSA	2,975	79,066	1.7	11,299	81.2	59.6	48.9	3.2	11.7	15.6	28.7
LS Pensacola-Ferry Pass-Brent FL MSA	1,464	29,348	0.9	8,019	81.6	54.7	44.2	3.2	12.3	15.2	33.0
LS Port St Lucie FL MSA	3,095	58,482	1.8	11,518	83.1	63.2	47.9	2.6	9.7	14.3	27.1
LS Punta Gorda FL MSA	977	20,104	0.6	4,120	83.4	61.9	51.5	2.2	7.4	14.4	30.7
LS Sebastian-Vero Beach FL MSA	962	30,887	0.6	4,033	78.3	56.4	46.4	2.6	13.1	19.1	30.5
LS Sebring FL MSA	328	7,126	0.2	1,475	81.4	56.1	55.9	1.5	10.4	17.1	33.5
LS Tallahassee FL MSA	1,305	28,957	0.8	7,281	79.9	60.7	49.3	3.2	10.3	16.9	29.0
LS Tampa-St Petersburg-Clearwater FL MSA	24,036	647,472	14.1	74,386	80.5	60.4	48.6	3.2	11.0	16.3	28.6
LS The Villages FL MSA	349	10,336	0.2	1,698	80.6	55.6	43.1	2.5	13.5	16.9	30.9
LS Florida Non-MSA	1,546	22,727	0.9	6,110	80.1	60.8	47.3	2.8	6.7	17.2	32.5
Total	170,575	4,283,181	100.0	569,413	80.9	61.6	48.1	3.1	11.0	16.0	27.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank's originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good. The distribution is adequate in the Jacksonville, FL MSA, good in the Miami-Fort Lauderdale-West Palm Beach, FL MSA, and adequate in the North Port-Sarasota-Bradenton, FL MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 27.9 percent of its small loans to farms.

Jacksonville, FL MSA

The distribution of the bank's small loans to farms by revenue within the Jacksonville, FL MSA is adequate. Based on farms with known revenues, the proportion of the bank's small loans to farms at 56.1 percent is lower than the 96.7 percent of farms with gross annual revenues of \$1 million or less. The distribution of the bank's small loans to farms is higher than the 43.4 percent for aggregate lenders.

Miami-Fort Lauderdale-West Palm Beach, FL MSA

The distribution of the bank’s small loans to farms by revenue within the Miami-Fort Lauderdale-West Palm Beach is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 61.1 percent is lower than the 96.6 percent of farms with gross annual revenues of \$1 million or less. The distribution of the bank’s small loans to farms is higher than the 51.9 percent for aggregate lenders.

North Port-Sarasota-Bradenton, FL MSA

The distribution of the bank’s small loans to farms by revenue within the North Port-Sarasota-Bradenton, FL MSA is adequate. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 54.5 percent is lower than the proportion of farms with gross annual revenues of \$1 million or less. The distribution of the bank’s small loans to farms is higher than the 38 percent for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Jacksonville FL MSA	41	381	4.1	83	96.7	56.1	43.4	2.1	7.3	1.2	36.6
FS Miami-Fort Lauderdale-West Palm Beach FL MSA	306	4,004	31.4	351	96.6	61.1	51.9	2.5	11.1	1.0	27.8
FS North Port-Sarasota-Bradenton FL MSA	55	759	5.9	71	96.3	54.5	38.0	2.7	9.1	1.0	36.4
LS Cape Coral-Fort Myers FL MSA	40	295	4.0	49	96.8	80.0	53.1	2.1	7.1	1.1	17.5
LS Crestview -Fort Walton Beach-Destin FL MSA	10	78	1.0	23	97.2	60.0	17.4	1.7	0.0	1.1	40.0
LS Deltona-Daytona Beach-Ormond Beach FL MSA	28	448	3.0	41	97.5	67.9	43.9	1.4	15.0	1.1	21.4
LS Gainesville FL MSA	23	542	3.1	107	95.9	60.9	57.9	2.4	20.0	1.7	30.4
LS Homosassa Springs FL MSA	13	127	1.7	16	99.1	69.2	75.0	0.4	0.0	0.5	33.3
LS Lakeland-Winter Haven FL MSA	19	208	1.9	64	95.6	63.2	67.2	3.4	21.1	0.9	25.0
LS Naples-Immokalee-Marco Island FL MSA	36	351	4.5	31	94.3	80.6	64.5	3.9	13.3	1.7	38.5
LS Ocala FL MSA	49	369	7.5	73	97.4	65.3	37.0	1.8	4.2	0.8	32.7
LS Orlando-Kissimmee-Sanford FL MSA	71	908	7.6	161	96.2	62.0	40.4	2.5	16.9	1.2	21.1
LS Palm Bay-Melbourne-Titusville FL MSA	24	912	2.9	31	97.9	50.0	51.6	1.4	21.1	0.7	33.3
LS Pensacola-Ferry Pass-Brent FL MSA	19	238	2.0	48	98.2	63.2	25.0	0.8	14.3	1.0	35.7
LS Port St Lucie FL MSA	40	472	4.0	53	95.9	70.0	49.1	2.8	7.7	1.4	25.0
LS Punta Gorda FL MSA	12	172	1.3	9	97.7	58.3	55.6	1.0	25.0	1.4	33.3
LS Sebastian-Vero Beach FL MSA	13	251	1.8	28	94.7	25.0	53.6	3.8	33.3	1.5	61.5
LS Sebring FL MSA	20	236	2.0	26	93.3	40.0	42.3	5.0	20.0	1.7	40.0
LS Tallahassee FL MSA	11	162	1.1	57	97.1	100.0	49.1	1.9	0.0	1.0	0.0
LS Tampa-St Petersburg-Clearwater FL MSA	115	1,737	11.9	152	96.7	62.6	42.8	2.2	7.0	1.1	30.4
LS The Villages FL MSA	13	575	1.8	11	96.4	69.2	36.4	2.0	16.7	1.6	42.9
LS Florida Non-MSA	48	645	6.0	95	94.3	58.3	47.4	3.7	14.6	2.0	27.1
Total	1,006	13,870	100.0	1,580	96.5	62.3	47.4	2.4	9.7	1.1	27.9

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a positive effect overall on the bank’s Lending Test performance in the state of Florida.

Jacksonville, FL MSA

In the Jacksonville, FL MSA, CD lending has a neutral effect on the lending performance in the assessment area. The bank originated five CD loans totaling \$15.4 million that primarily support economic development, and community services. CD loans helped to finance the development of 72 units of affordable housing. CD lending represents 0.6 percent of the allocated Tier 1 Capital, after adjusting for \$3.7 billion in non-local deposits. The bank met the community's credit needs primarily through retail lending.

Examples of CD loans include:

- An End-2-End loan for \$12.7 million for new construction of the Houston Street Manor Apartments targeted to seniors, age 62 and older, to be located in Jacksonville, FL. The project consists of a seven-story building with 37 one- and 35 two-bedroom units. Unit income restrictions include eight at 33 percent of area median income (AMI) and 64 at 60 percent of AMI. The bank is also providing LIHTC equity investment for this project.
- A two-month renewal of an existing \$222,000 line of credit to an organization that works to bridge the gap in high-poverty communities between the support that students actually need and what their schools can provide. This organization collaborates with public schools in 27 locations across the United States. All 152 schools served between 2012 and 2014 had a majority of students that were economically disadvantaged with percentages ranging from 75 percent to 100 percent. Economic disadvantage was determined based on school-level demographics and poverty data, including the percentage students eligible for the free/reduced-price lunch and also census and state human services database information.
- An SBA 504 lending package for \$1.1 million for the purchase of existing industrial buildings and land located in Jacksonville FL. The loan recipient is a scrap metal recycling business that collects and sells primarily nonferrous metals mostly copper tin and aluminum. This financing package will allow the customer to acquire three lots and existing buildings to start a new recycling business.

Miami-Fort Lauderdale-West Palm Beach, FL MSA

In the Miami-Fort Lauderdale-West Palm Beach, FL MSA, CD lending has a positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated 65 CD loans totaling \$299 million, or 6.5 percent of the allocated Tier 1 Capital. The CD loans primarily support economic development and affordable housing. CD loans provided over 2,000 units of affordable housing.

Examples of CD loans include:

- A \$1.9 million loan to refinance the acquisition of an industrial building located in Doral, FL. The subject transaction is part of an SBA 504 lending package for a wholesale distributor of computer hardware, software and related equipment and supplies in the United States. Utilizing the SBA program enables the small business to obtain financing with substantially less cash investment than is typical in conventional financing.

- Construction and bridge financing for \$8.8 million for rehab of South Miami Plaza Preservation, an existing affordable housing development constructed in 1974 and located in Miami, FL. The project consists of one 6-story building with 97 studio and one-bedroom units, community room with a computer and library center, leasing office, fitness center, and laundry facilities. Unit income restrictions include 19 for households at or below 28 percent of AMI and 78 for households at or below 60 percent AMI (replacement public housing units) under an Annual Contribution Contract for seniors age 55 years and older. The Bank is also providing LIHTC equity investment for this project.
- Construction financing for \$17 million to rehabilitate Jack Orr Plaza, a 200-unit affordable housing community for seniors 55 years or older that is located in Miami FL. The project consists of one twelve-story building with 154 studio units and 46 one-bedroom units. After renovations, there will be 200 one-bedroom units. In addition, the project will have a community room, exercise room, computer and library lab, leasing office, and laundry facilities. Unit income restrictions include 40 units at 28 percent of AMI or below, and 160 units at 60 percent AMI or below. All of the units have an Annual Contributions Contract (ACC) operating subsidy managed by the Miami-Dade Public Housing Agency. Any vacancies not filled by existing residents (either at initial occupancy or thereafter) will be filled by residents who are referred by the County from the County's waiting list. The Bank is also providing LIHTC equity investment for this project.

North Port-Sarasota-Bradenton, FL MSA

In the North Port-Sarasota-Bradenton, FL MSA, CD lending has a neutral effect on the lending performance in the assessment area. The bank originated seven CD loans totaling \$18.4 million that primarily supported affordable housing and economic development. CD lending represents 3.8 percent of the allocated Tier 1 Capital. The bank met the community's credit needs primarily through retail lending.

Examples of CD loans include:

- The bank provided \$8.4 million in construction/bridge financing for Venetian Walk Senior Apartments, a 61-unit affordable housing development located in Venice FL. This project is for seniors age 62 and over, of which 25 will be public housing units. It is the first phase of a planned two-phase development to replace 50 public housing units at Grove Terrace Apartments that were in poor condition and functionally obsolete. The development will include a single four-story building with 53 one-bedroom and eight two-bedroom units. An Annual Contributions Contract operating subsidy will support the housing units. All units are restricted to renters with incomes at or below 60 percent of the area median income.
- The bank provided a six-month renewal to extend the maturity date of a \$1 million construction loan to facilitate the development of Bradenton Village II, a scattered-site development located in Bradenton FL. This renewal allows additional time for the borrower to obtain permanent financing. Bradenton Village II includes 30 non-assisted senior units, 48 multifamily and 39 single-family rental properties attached and detached

for 117 units total. Sixty-five units are public housing units restricted to households earning at or below 30 percent of the area median income and 52 are LIHTC units restricted to households earning at or below 60 percent of the area median income.

- The bank provided \$2.3 million in bridge financing for the development of Rolling Green Apartments, a 118-unit affordable housing project in Sarasota, FL. All units are restricted to renters with incomes at or below 60 percent of the area median income. Bank of America also provided a LIHTC equity investment in the project.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Florida, lending under the MHA and HARP programs accounted for 77 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance varied across the limited-scope assessment areas. Performance in the Deltona-Daytona Beach-Ormond Beach, FL MSA, Orlando-Kissimmee-Sanford, FL MSA, Pensacola-Ferry Pass-Brent, FL MSA, Punta Gorda, FL MSA, and Tampa-St Petersburg-Clearwater, FL MSA is consistent with the Outstanding Lending Test performance in the state of Florida. Performance in the Cape Coral-Fort Myers, FL MSA, Crestview-Fort Walton Beach-Destin, FL MSA, Gainesville, FL MSA, Homosassa Springs, FL MSA, Lakeland-Winter Haven, FL MSA, Naples-Immokalee-Marco Island, FL MSA, Ocala, FL MSA, Palm Bay-Melbourne-Titusville, FL MSA, Port St Lucie, FL MSA, Sebastian-Vero Beach, FL MSA, Sebring, FL MSA, Tallahassee, FL MSA, The Villages, FL MSA, and Florida Non-MSA is weaker than the overall Outstanding Lending Test performance in the state of Florida due to weaker geographic distributions and or limited levels of CD lending.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Florida is rated Outstanding. Investment performance is excellent in the Jacksonville, FL MSA, Miami-Fort Lauderdale-West Palm Beach, FL MSA, and North Port-Sarasota-Bradenton, FL MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Jacksonville, FL MSA

In the Jacksonville, FL MSA, the bank has an excellent level of community development investments. The bank made 452 community development investments during the current evaluation period totaling \$240 million. Approximately \$88.5 million or 99 percent of the current period investment dollars supported more than 2,000 units of affordable housing. In addition, the bank has 293 community development investments totaling \$50 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior and current period investments total \$290.0 million or 9.64 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$193.6 million or 81 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$19.8 million in a LIHTC to finance the rehabilitation of Cathedral Towers, a 203-unit affordable housing development in Jacksonville, FL. The property consists of an 18-story high rise that houses low-income elderly families and persons requiring accessible features. All units, except one designated for the onsite manager, are restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$19.3 million in a LIHTC to help fund construction of Houston Street Manor Apartments, a 72-unit affordable housing development in Jacksonville, FL for seniors aged 55 and older. All units are restricted to incomes at or below 60 percent of the area median income. The bank is also providing construction financing for the project.
- The bank invested \$1.8 million in a commercial-backed security backed by a pool of recently originated multifamily mortgage loans. This transaction represents Whispering Woods, a 200-unit multifamily affordable housing development in St. Augustine, FL. The bank's investment represents its 14 percent share of total funding for the housing development. Based on its share in the pool, the investment supports 37 units of affordable housing.

Miami-Fort Lauderdale-West Palm Beach, FL MSA

In the Miami-Fort Lauderdale-West Palm Beach, FL MSA, the bank has an excellent level of community development investments. The bank made 779 community development investments during the current evaluation period totaling \$554 million. Approximately \$359.3 million or 65 percent of the current period investment dollars supported more than 3,000 units of affordable housing. In addition, the bank has 331 community development investments totaling \$119 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior and current period investments total \$673.3 million or 14.5 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are innovative or complex with LIHTCs, New Markets Tax Credits, and the School District of Palm Beach bond representing approximately \$348.7 million or 63 percent of the investment dollars.

Examples of community development investments include:

- The bank purchased a \$115.6 million Certificate of Participation note issued by the School Board of Palm Beach County. This note replaces a note issued in 2002 for the original purpose of financing the replacement and modernization of four elementary schools (Belvedere Elementary, Greenacres Elementary, Jupiter Elementary, and South Olive Elementary), a middle school (Lantana Middle), constructing a new middle school (Jeaga Middle), and acquiring the site for a new middle school (Don Estridge High Tech). Six of the seven schools have a majority of students eligible for the free or reduced price lunch program
- The bank invested \$19.8 million in a Fannie Mae commercial mortgage backed security representing Miami Gardens Apartments, a 331-unit multifamily affordable housing development. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$23.1 million in a LIHTC for the rehabilitation of Jack Orr Plaza, a 200-unit affordable housing community for seniors located in Miami, FL. All units are restricted to incomes at or below 60 percent of the area median income.

North Port-Sarasota-Bradenton, FL MSA

In the North Port-Sarasota-Bradenton, FL MSA, the bank has an excellent level of community development investments. The bank made 118 community development investments during the current evaluation period totaling \$44 million. Approximately \$43.6 million or 99 percent of the current period investment dollars supported more than 80 units of affordable housing. In addition, the bank has 79 community development investments totaling \$4.6 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior and current period investments total \$48.6 million or 10.1 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$22.5 million or 51 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$7.8 million in a low-income housing tax credit (LIHTC) for the construction of Rolling Green Apartments, a 118-unit multifamily housing development located in Sarasota, FL. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$13.2 million in a LIHTC for the construction of Venetian Walk, a 61-unit affordable housing complex for seniors located in Venice, FL. All units are restricted to incomes at or below 60 percent of the area median income.

Table 14. Qualified Investments								2012-2016	
QUALIFIED INVESTMENTS		Geography: FLORIDA			Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Jacksonville, FL	293	50,061	452	239,901	745	289,962	17.01	0	0
Miami, FL	331	119,409	779	553,861	1,110	673,270	39.49	7	27,375
North Port, FL	79	4,573	118	44,008	197	48,581	2.85	0	0
Limited Review									
Cape Coral, FL	30	3,110	95	26,523	125	29,633	1.74	0	0
Crestview, FL	4	164	35	4,913	39	5,077	0.30	0	0
Deltona, FL	35	1,788	35	27,334	70	29,122	1.71	0	0
Gainesville, FL	13	589	51	11,285	64	11,874	0.70	0	0
Homosassa Springs, FL	1	50	49	4,072	50	4,122	0.24	0	0
Lakeland, FL	15	6,345	45	92,276	60	98,621	5.78	0	0
Naples, FL	35	1,528	69	12,660	104	14,188	0.83	0	0
Ocala, FL	9	465	76	9,021	85	9,487	0.56	0	0
Orlando, FL	38	28,796	91	150,884	129	179,680	10.54	2	4,488
Palm Bay, FL	19	2,585	85	16,575	104	19,160	1.12	0	0
Pensacola, FL	11	5,107	38	5,155	49	10,261	0.60	0	0
Port St. Lucie, FL	8	342	26	17,967	34	18,310	1.07	1	2,233
Punta Gorda, FL	6	307	21	20,125	27	20,432	1.20	2	11,778
Sebastian, FL	4	371	40	9,707	44	10,078	0.59	0	0
Sebring, FL	2	1,371	21	1,278	23	2,649	0.16	0	0
Tallahassee, FL	5	957	52	8,707	57	9,664	0.57	0	0
Tampa, FL	36	48,927	217	156,000	253	204,927	12.02	2	1,604
The Villages, FL	0	0	17	1,607	17	1,607	0.09	0	0
Florida Non-MSA	3	167	52	2,498	55	2,665	0.16	0	0
FLORIDA - Statewide	0	0	35	695	35	695	0.04	0	0
FLORIDA - Non Assessed	25	8,188	50	2,712	75	10,900	0.64	0	0
FLORIDA	1,002	285,200	2,549	1,419,765	3,551	1,704,965	100.00	14	47,479

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance varied across the limited-scope assessment areas. Performance in the Cape Coral-Fort Myers, FL MSA, Crestview-Fort Walton Beach-Destin, FL MSA, Deltona-Daytona Beach-Ormond Beach, FL MSA, Gainesville, FL MSA, Lakeland-Winter Haven, FL MSA, Orlando-Kissimmee-Sanford, FL MSA, Palm Bay-Melbourne-Titusville, FL MSA, Pensacola-Ferry Pass-Brent, FL MSA, Port St Lucie, FL MSA, Punta Gorda, FL MSA, Sebastian-Vero Beach, FL MSA, Tampa-St Petersburg-Clearwater, FL MSA, and The Villages, FL MSA is consistent with the Outstanding Investment Test performance in the state of Florida. Performance in the Homosassa Springs, FL MSA, Naples-Immokalee-Marco Island, FL MSA, Ocala, FL MSA, Sebring, FL MSA, Tallahassee, FL MSA, and Florida Non-MSA is weaker than the overall Outstanding Investment Test performance in the state of Florida. Performance is weaker due to lower levels of community development investments relative to the bank's financial capacity in those assessment areas.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Florida is rated High Satisfactory. Service Test performance is excellent in the Jacksonville, FL MSA, good in the Miami-Fort Lauderdale-West Palm Beach, FL MSA, and adequate in the North Port-Sarasota-Bradenton, FL MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Jacksonville, FL MSA

In the Jacksonville, FL MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 34 financial centers with the distribution of the population. The bank has two financial centers in low-income geographies representing 5.9 percent of its financial centers. Considering 4.6 percent of the population lives in low-income geographies, financial center distribution in low-income geographies is excellent. The bank has seven financial centers in moderate-income geographies representing 20.6 percent of its financial centers. Considering 19.2 percent of the population lives in moderate-income geographies, financial center distribution in moderate-income geographies is excellent.

Examiners also considered the bank's alternative delivery systems, including ATMs and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have no effect on the retail banking services conclusion.

The bank has six financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. The bank has one financial center adjacent to a low-income census tract and five financial centers adjacent to middle-income census tracts. The adjacent financial centers help expand accessibility of service delivery systems in low- and moderate-income geographies and to low- and moderate-income individuals.

The bank's record of opening and closing branches generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center in a moderate-income geography and closed four (one each in a low and moderate-income geography and two in middle-income geographies). The closure of these branches has not had a significant adverse effect due to the high number of branches located in low- and moderate-income tracts.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are generally consistent throughout the assessment area. Financial centers are generally open 9:00 am to 4:00 pm Monday through Thursday and 9:00 am to 5:00 pm Friday. The bank has 17 or 50 percent of the financial centers open 9:00 am to 1:00 pm for Saturday banking.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Jacksonville FL MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	17	6.5	61,693	4.6	2	5.9	4	3.9	0	0.0	1	25.0
Moderate	60	23.1	258,679	19.2	7	20.6	26	25.5	1	100.0	1	25.0
Middle	112	43.1	624,089	46.4	13	38.2	44	43.1	0	0.0	2	50.0
Upper	69	26.5	401,135	29.8	12	35.3	28	27.5	0	0.0	0	0.0
NA	2	0.8	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	260	100.0	1,345,596	100.0	34	100.0	102	100.0	1	100.0	4	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Miami-Fort Lauderdale-West Palm Beach, FL MSA

In the Miami-Fort Lauderdale-West Palm Beach, FL MSA, the bank’s service delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 196 financial centers with the distribution of the population. The bank has six financial centers in low-income geographies representing 3.1 percent of its financial centers. Considering 4.7 percent of the population resides in low-income geographies, financial center distribution in low-income geographies is adequate. The bank has 45 financial centers in moderate-income geographies representing 23 percent of its financial centers. Considering 27.3 percent of the population resides in moderate-income geographies, financial center distribution in moderate-income geographies is good.

Examiners also considered the bank’s alternative delivery systems, including ATMs and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have no effect on the retail banking services conclusion.

The bank has 46 financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. The bank has 3 financial centers adjacent to low-income census tracts and 43 financial centers adjacent to middle-income census tracts. The adjacent financial centers help expand accessibility of service delivery systems in low- and moderate-income geographies and to low- and moderate-income individuals.

The bank’s record of opening and closing branches generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened five financial centers and closed 14. Five of the closures were in moderate-income geographies with the remaining nine financial center closures in middle- and upper-income geographies.

Despite the closures, financial centers remain accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are generally consistent throughout the assessment area. Financial centers are generally open 9:00 am to 4:00 pm Monday through Thursday and 9:00 am to 6:00 pm Friday. The bank has 130 or 66 percent of the financial centers open 9:00 am to 1:00 pm for Saturday banking.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Miami-Fort Lauderdale-West Palm Beach FL MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	71	5.8	262,858	4.7	6	3.1	21	3.0	1	20.0	0	0.0
Moderate	315	25.9	1,519,843	27.3	45	23.0	182	25.6	1	20.0	5	35.7
Middle	405	33.3	1,925,153	34.6	60	30.6	229	32.3	1	20.0	4	28.6
Upper	399	32.8	1,839,405	33.1	82	41.8	237	33.4	2	40.0	5	35.7
NA	26	2.1	17,376	0.3	3	1.5	41	5.8	0	0.0	0	0.0
Totals	1,216	100.0	5,564,635	100.0	196	100.0	710	100.0	5	100.0	14	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

North Port-Sarasota-Bradenton, FL MSA

In the North Port-Sarasota-Bradenton, FL MSA, the bank’s service delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank has no financial centers in low-income geographies where 2.7 percent of the population lives. Financial center distribution in low-income geographies is poor. The bank has five financial centers in moderate-income geographies representing 15.2 percent of its financial centers. Considering 23.5 percent of the population lives in moderate-income geographies, financial center distribution in moderate-income geographies adequate.

Examiners also considered the bank’s alternative delivery systems, including ATMs and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have no effect on the service delivery systems conclusion.

The bank has eight financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to moderate-income census tracts. The adjacent financial centers help expand accessibility of service delivery systems in moderate-income geographies and to low- and moderate-income individuals.

The bank’s record of opening and closing branches did adversely affect the accessibility or retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. The North Port-Sarasota-Bradenton, FL MSA does not have any branches in low-income tracts. During the evaluation period, the bank opened one financial center in a moderate-income geography and closed three financial centers in moderate-income geographies and one in a middle-income geography.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are generally consistent throughout the assessment area. Financial centers are generally open 9:00 am to 4:00 pm Monday through Thursday and 9:00 am to 4:00 pm Friday. The bank has 12 or 36 percent of the financial centers open 9:00 am to 1:00 pm for Saturday banking.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS North Port-Sarasota-Bradenton FL MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	4	2.3	18,761	2.7	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	42	24.4	164,698	23.5	5	15.2	13	19.1	1	100.0	3	75.0
Middle	78	45.3	328,465	46.8	18	54.5	38	55.9	0	0.0	1	25.0
Upper	48	27.9	190,357	27.1	10	30.3	17	25.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	172	100.0	702,281	100.0	33	100.0	68	100.0	1	100.0	4	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Jacksonville, FL MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 201 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 79 low- and moderate-income individuals and provided 29 financial education and foreclosure prevention workshops for 960 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees also provided 49 tax preparation workshops. Employees participated in 26 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 18 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Miami-Fort Lauderdale-West Palm Beach, FL MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 354 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 13 low- and moderate-income individuals and provided 160 financial education and foreclosure prevention workshops for 3,329 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 82 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 93 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

North Port-Sarasota-Bradenton, FL MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 43 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 2 low- and moderate-income individuals and provided 16 financial education and foreclosure prevention workshops for 345 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 11 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 14 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance varied across the limited-scope assessment areas. Performance in the Naples-Immokalee-Marco Island, FL MSA is consistent with the High Satisfactory performance under the Service Test in the state of Florida. Performance in the Cape Coral-Fort Myers, FL MSA, Gainesville, FL MSA, Lakeland-Winter Haven, FL MSA, Orlando-Kissimmee-Sanford, FL MSA, Tallahassee, FL MSA, and Tampa-St Petersburg-Clearwater, FL MSA is stronger than the overall good performance primarily due to higher accessibility to retail banking services. Performance in the Crestview-Fort Walton Beach-Destin, FL MSA, Deltona-Daytona Beach-Ormond Beach, FL MSA, Homosassa Springs, FL MSA, Ocala, FL MSA, Palm Bay-Melbourne-Titusville, FL MSA, Pensacola-Ferry Pass-Brent, FL MSA, Port St Lucie, FL MSA, Punta Gorda, FL MSA, Sebastian-Vero Beach, FL MSA, Sebring, FL MSA, The Villages, FL MSA, and Florida Non-MSA is weaker than the overall High Satisfactory Service Test performance in the state of Florida primarily due to lower accessibility to retail banking services in low- and moderate-income geographies and to low- and moderate-income individuals.

State of Georgia

CRA Rating for Georgia²²:	Outstanding
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>High Satisfactory</u>
The Service Test is rated:	<u>Outstanding</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Excellent distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Significant level and good responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Georgia

The state of Georgia is Bank of America's eighth largest rating area based on its total deposits in the state when excluding deposits in the Augusta-Richmond County, GA-SC Multistate MSA. Examiners excluded the multistate MSA from the analysis of the state of Georgia because examiners evaluated the multistate MSA as a separate rating area. As of June 30, 2016, the bank maintained approximately \$32.3 billion or 2.7 percent of its total domestic deposits in financial centers in areas of the state that do not include the multistate MSA. Of the 233 depository financial institutions operating in the portion of the state that excludes the multistate MSA, Bank of America, with a deposit market share of 14.7 percent, is the third largest. Depository financial institutions in the state of Georgia with deposit market shares greater than 5 percent include SunTrust Bank (22.3 percent), Wells Fargo Bank (15.4 percent), Synovus Bank (6.2 percent), and Branch Banking and Trust Company (5.6 percent). As of December 31, 2016, Bank of America operated 167 financial centers and 616 deposit-taking ATMs in the state, excluding the multistate MSA.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Atlanta-Sandy Springs-Roswell, GA MSA, Bank of America reported an additional \$3.4 billion in deposits of national corporations, in which the funds originated from communities

²² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area

Refer to the community profiles for the state of Georgia in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Georgia

Examiners selected two assessment areas for full-scope reviews and the remaining nine assessment areas for limited-scope reviews. The full-scope assessment areas were Athens-Clarke County, GA MSA and Atlanta-Sandy Springs-Roswell, GA MSA. While the Atlanta-Sandy Springs-Roswell, GA MSA carries approximately 90 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in Georgia, examiners based the conclusions and ratings for the state on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 46,314 home mortgage loans totaling \$8.5 billion, 67,828 small loans to businesses totaling \$1.9 billion, 317 small loans to farms totaling \$5.6 million, and 32 CD loans totaling \$144.6 million. Lending volumes include loans originated or purchased in the Albany, GA MSA and Hinesville-Ft Stewart, GA MSA, which the bank no longer designates as assessment areas due to the bank's closure or sale of all financial centers and deposit-taking ATMs. Based on loan volume, examiners weighted small loans to businesses, representing 59.3 percent of the volume, the most followed by home mortgage lending at 40.5 percent, and small loans to farms at less than 1 percent.

Only in the Atlanta-Sandy Springs-Roswell, GA MSA and Georgia Non-MSA (limited-scope) assessment areas did the bank originate or purchase sufficient volumes of small loans to farms to provide any meaningful analysis.

The OCC interviewed four community based organizations and local government agencies. The interviewees identified affordable housing, employment, and community services as the most pressing needs of the communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Georgia is rated Outstanding, based on excellent lending activity, excellent geographic distribution, and good borrower income distribution. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Georgia is excellent. Lending activity is excellent in each of the full-scope assessment areas.

Athens-Clarke County, GA MSA

Lending activity in the Athens-Clarke County, GA MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 14 percent. The bank ranks second among 18 depository financial institutions in the assessment area, which places it in the top 12 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.5 percent based on the number of home mortgage loans originated or purchased. The bank ranks 21st among 285 home mortgage lenders, which places it in the top 8 percent of lenders. According to peer small business lending data for 2016, the bank has a market share of 7.6 percent based on the number of small loans to businesses originated or purchased. The bank ranks third among 73 small business lenders, which places it in the top 5 percent of lenders. The bank originated too few small loans to farms for any meaningful analysis. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its deposit ranking, overall lending activity is excellent.

Atlanta-Sandy Springs-Roswell, GA MSA

Lending activity in the Atlanta-Sandy Springs-Roswell, GA MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 16.3 percent. The bank ranks third among 87 depository financial institutions in the assessment area, which places it in the top 4 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.2 percent based on the number of home mortgage loans originated or purchased. The bank ranks eighth among 841 home mortgage lenders in the assessment area, which places it in the top 1 percent of lenders. According to peer small business lending data for 2016, the bank has a market share of 9.5 percent based on the number of small loans to businesses originated or purchased. The bank ranks third among 205 small business lenders, placing it in the top 2 percent of lenders. According to peer small farm lending data for 2016, the bank has a market share of 10.4 percent based on the number of small loans to farms originated or purchased. The bank ranks fourth among 29 farm lenders, which places it in the top 14 percent of lenders for farm loans. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its deposit ranking, overall lending activity is excellent.

LENDING VOLUME		Geography: GEORGIA						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Athens, GA	1.55	685	103,656	1,070	18,734	23	199	1	44	1,779	122,633	1.71
Atlanta, GA	82.99	37,397	7,107,532	57,448	1,583,647	149	1,737	21	110,448	95,015	8,803,364	89.97
Limited Review												
Albany, GA	0.42	260	30,071	211	6,043	10	1,463	0	0	481	37,577	0.00
Brunswick, GA	1.15	536	128,976	764	21,568	18	371	0	0	1,318	150,915	0.42
Columbus, GA	0.95	646	94,617	436	9,359	3	21	1	7,104	1,086	111,101	0.09
Dalton, GA	0.75	374	40,156	480	14,992	4	22	1	88	859	55,258	1.26
Gainesville, GA	1.83	913	145,590	1,176	47,515	9	87	1	44	2,099	193,236	0.52
Hinesville, GA	0.20	165	20,682	65	2,739	0	0	0	0	230	23,421	0.00
Macon, GA	1.51	795	95,670	915	21,138	15	114	2	2,784	1,727	119,706	1.34
Savannah, GA	4.71	2,352	405,210	3,008	112,862	23	305	4	12,477	5,387	530,854	3.28
Valdosta, GA	1.05	514	67,527	667	18,500	18	132	0	0	1,199	86,159	0.58
Warner Robins, GA	1.06	643	86,650	554	11,683	13	713	1	11,645	1,211	110,691	0.48
Georgia Non-MSA	1.83	1,034	138,214	1,034	21,370	32	441	0	0	2,100	160,025	0.36
GEORGIA	100.00	46,314	8,464,551	67,828	1,890,150	317	5,605	32	144,634	114,491	10,504,940	100.00
(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area. (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016. (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.												

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is adequate in the Athens-Clarke County, GA MSA and good in the Atlanta-Sandy Springs-Roswell, GA MSA.

Athens-Clarke County, GA MSA

The geographic distribution of home mortgage loans in the Athens-Clarke County, GA MSA is adequate. Performance is adequate in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 4.4 percent is lower than the 4.9 percent of owner-occupied housing units in low-income geographies and 6.2 percent for aggregate lenders. The distribution in moderate-income geographies at 7.7 percent is lower than the 11.1 percent of owner-occupied housing units in moderate-income geographies and 8.8 percent for aggregate lenders.

Atlanta-Sandy Springs-Roswell, GA MSA

The geographic distribution of home mortgage loans in the Atlanta-Sandy Springs-Roswell, GA MSA is good. Performance is good in low-income geographies and good in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 2.3 percent is lower than the 2.8 percent of owner-occupied housing units in low-income geographies, but higher than the 1.8 percent performance for aggregate lenders. The distribution in moderate-income geographies at 14.7 percent is lower than the 18.7 percent of owner-occupied housing units in moderate-income geographies, but is higher than the 13.7 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Athens-Clarke County GA MSA	274	41,878	1.5	6,159	4.9	4.4	6.2	11.1	7.7	8.8	47.9	40.9	40.2	36.1	47.1	44.7	0.0	0.0	0.0
FS Atlanta-Sandy Springs-Roswell GA MSA	15,377	3,273,036	82.1	229,304	2.8	2.3	1.8	18.7	14.7	13.7	41.1	39.8	40.4	37.4	43.2	44.1	0.0	0.0	0.0
LS Brunswick GA MSA	219	58,856	1.2	3,700	0.0	0.0	0.0	25.4	12.3	13.2	47.1	36.1	38.5	27.5	51.6	48.3	0.0	0.0	0.0
LS Columbus GA MSA	267	36,802	1.4	5,935	2.4	0.7	0.6	15.8	11.2	7.7	33.9	35.2	28.0	47.9	52.8	63.8	0.0	0.0	0.0
LS Dalton GA MSA	149	14,445	0.8	2,783	1.5	2.7	1.4	8.4	11.4	7.1	63.1	56.4	59.8	26.9	29.5	31.7	0.0	0.0	0.0
LS Gainesville GA MSA	362	62,556	1.9	7,177	0.0	0.0	0.0	15.5	14.1	14.3	55.5	58.8	54.7	29.0	27.1	31.0	0.0	0.0	0.0
LS Georgia Non-MSA	246	32,470	1.3	5,414	0.6	0.4	0.6	5.2	3.7	3.8	44.9	35.8	38.6	49.4	60.2	57.0	0.0	0.0	0.0
LS Macon-Bibb County GA MSA	315	36,568	1.7	4,319	5.2	2.9	1.2	21.5	14.3	10.9	37.0	30.5	39.2	36.3	52.4	48.7	0.0	0.0	0.0
LS Savannah GA MSA	978	165,001	5.2	13,538	4.2	3.2	2.5	15.8	10.8	8.6	38.9	35.4	38.1	41.1	50.6	50.8	0.0	0.0	0.0
LS Valdosta GA MSA	241	31,141	1.3	3,774	2.8	0.4	1.1	24.2	20.7	21.0	35.8	23.7	27.8	37.2	55.2	50.1	0.0	0.0	0.0
LS Warner Robins GA MSA	296	41,801	1.6	6,573	0.9	0.0	0.4	22.8	13.9	12.0	42.5	45.3	37.8	33.8	40.9	49.8	0.0	0.0	0.0
Total	18,724	3,794,554	100.0	288,676	2.7	2.2	1.7	18.0	14.2	13.0	41.7	39.7	40.3	37.5	44.0	45.0	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is good in the Athens-Clarke County, GA MSA and excellent in the Atlanta-Sandy Springs-Roswell, GA MSA.

Athens-Clarke County, GA MSA

The geographic distribution of small loans to businesses in the Athens-Clarke County, GA MSA is good. Performance is adequate in low-income geographies and good in moderate-

income geographies. The distribution in low-income geographies at 11.5 percent is lower than the 16.3 percent of businesses in low-income geographies and 13.4 percent performance for aggregate lenders. The distribution in moderate-income geographies at 8.8 percent is lower than the 11 percent of businesses in moderate-income geographies and 9.6 percent performance for aggregate lenders.

Atlanta-Sandy Springs-Roswell, GA MSA

The geographic distribution of small loans to businesses in the Atlanta-Sandy Springs-Roswell, GA MSA is excellent. The distribution is excellent in low-income geographies and good in moderate-income geographies. The geographic distribution in low-income geographies at 4.8 percent is higher than the 4.6 percent of businesses in low-income geographies and 4.1 percent performance for aggregate lenders. The geographic distribution in moderate-income geographies at 18.7 percent is lower than the 21.2 percent of businesses in moderate-income geographies, but is higher than the 18.3 percent performance of aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Athens-Clarke County GA MSA	670	12,053	1.5	3,344	16.3	11.5	13.4	11.0	8.8	9.6	36.0	36.4	34.5	36.7	43.3	42.4	0.0	0.0	0.0
FS Atlanta-Sandy Springs-Roswell GA MSA	37,622	975,686	86.3	148,983	4.6	4.8	4.1	21.2	18.7	18.3	35.2	31.8	32.3	38.9	44.7	45.3	0.1	0.0	0.0
LS Brunswick GA MSA	468	11,326	1.1	2,236	0.0	0.0	0.0	35.0	30.3	26.1	31.2	26.3	29.6	33.7	43.4	44.3	0.0	0.0	0.0
LS Columbus GA MSA	264	3,907	0.6	3,298	8.8	6.4	7.9	22.0	16.7	19.0	27.7	25.4	26.4	41.4	51.5	46.7	0.1	0.0	0.0
LS Dalton GA MSA	294	10,992	0.7	1,691	4.5	3.1	5.0	21.3	22.4	20.0	51.1	55.1	48.7	23.1	19.4	26.3	0.0	0.0	0.0
LS Gainesville GA MSA	749	29,373	1.7	4,208	0.0	0.0	0.0	28.7	28.3	26.3	46.1	44.6	47.4	25.2	27.1	26.3	0.0	0.0	0.0
LS Georgia Non-MSA	411	7,767	0.9	2,924	2.6	1.5	3.8	10.0	6.6	10.6	48.1	43.3	42.7	39.2	48.7	42.9	0.0	0.0	0.0
LS Macon-Bibb County GA MSA	513	9,397	1.2	3,326	7.0	5.1	5.3	20.7	17.0	19.8	36.6	37.4	34.5	35.7	40.5	40.4	0.0	0.0	0.0
LS Savannah GA MSA	1,860	70,957	4.3	7,441	5.6	4.5	4.9	20.3	19.3	19.7	36.6	37.0	34.5	37.2	38.9	40.6	0.3	0.3	0.3
LS Valdosta GA MSA	385	7,131	0.9	2,196	4.7	3.1	3.6	37.1	37.7	37.8	21.2	21.6	19.3	37.0	37.7	39.3	0.0	0.0	0.0
LS Warner Robins GA MSA	361	6,125	0.9	2,041	3.8	2.1	2.2	27.1	20.8	25.4	46.0	45.4	46.8	23.0	32.4	25.6	0.0	0.0	0.0
Total	43,597	1,144,714	100.0	181,688	4.9	4.7	4.2	21.4	19.0	18.8	35.7	32.5	33.0	37.9	43.8	44.0	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The geographic distribution of small loans to farms is excellent, driven by performance in the Atlanta-Sandy Springs-Roswell, GA MSA.

Athens-Clarke County, GA MSA

The bank made too few small loans to farms in the Athens-Clarke County, GA MSA to perform any meaningful analysis.

Atlanta-Sandy Springs-Roswell, GA MSA

The geographic distribution of small loans to farms in the Atlanta-Sandy Springs-Roswell, GA MSA is excellent based on excellent performance in low-income geographies and excellent performance in moderate-income geographies. The geographic distribution in low-income geographies at 3.7 percent is higher than the 2.8 percent of farms in low-income geographies and it is higher than the 0.9 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 25.3 percent is higher than the 20.2 percent of farms in moderate-income geographies and the bank’s performance is slightly lower than the 27.4 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggr gate	% Farms	% Bank Loans	Aggr gate	% Farms	% Bank Loans	Aggr gate	% Farms	% Bank Loans	Aggr gate	% Farms	% Bank Loans	Aggr gate
FS Athens-Clarke County GA MSA	18	172	13.0	60	3.0	0.0	0.0	8.9	14.3	0.0	52.5	66.7	88.3	35.6	27.8	11.7	0.0	0.0	0.0
FS Atlanta-Sandy Springs-Roswell GA MSA	91	1,095	50.0	321	2.8	3.7	0.9	20.2	25.3	27.4	43.9	44.0	42.7	33.0	29.7	29.0	0.0	0.0	0.0
LS Brunswick GA MSA	10	310	5.5	24	0.0	0.0	0.0	26.6	40.0	33.3	43.1	33.3	45.8	30.3	40.0	20.8	0.0	0.0	0.0
LS Columbus GA MSA	1	10	1.6	42	4.1	0.0	0.0	17.7	0.0	23.8	27.7	100.0	61.9	50.3	100.0	14.3	0.2	0.0	0.0
LS Dalton GA MSA	2	12	3.3	14	0.9	0.0	0.0	11.3	0.0	0.0	67.3	100.0	78.6	20.5	0.0	21.4	0.0	0.0	0.0
LS Gainesville GA MSA	6	70	4.4	26	0.0	0.0	0.0	16.3	50.0	11.5	52.7	33.3	61.5	31.0	66.7	26.9	0.0	0.0	0.0
LS Georgia Non-MSA	3	29	1.6	99	0.0	0.0	0.0	4.3	0.0	3.0	46.1	0.0	61.6	49.7	100.0	35.4	0.0	0.0	0.0
LS Macon-Bibb County GA MSA	13	104	7.8	42	2.4	0.0	0.0	23.9	50.0	23.8	31.5	30.8	40.5	42.3	30.8	35.7	0.0	0.0	0.0
LS Savannah GA MSA	14	182	12.2	37	3.0	0.0	0.0	14.5	21.4	8.1	41.4	78.6	48.6	41.1	35.7	43.2	0.1	0.0	0.0
LS Valdosta GA MSA	12	107	6.6	92	0.7	0.0	0.0	29.3	41.7	38.0	38.0	41.7	38.0	31.9	25.0	23.9	0.0	0.0	0.0
LS Warner Robins GA MSA	7	693	5.9	55	1.0	0.0	1.8	34.2	50.0	25.5	40.9	57.1	61.8	23.9	33.3	10.9	0.0	0.0	0.0
Total	183	2,857	100.0	812	2.5	1.9	0.5	19.4	24.0	21.4	43.8	44.8	51.6	34.3	30.6	26.5	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is excellent. The distribution is good in the Athens-Clarke County, GA MSA and excellent in the Atlanta-Sandy Springs-Roswell, GA MSA.

Athens-Clarke County, GA MSA

The distribution of home mortgage loans by borrower income in the Athens-Clarke County, GA MSA is good. The distribution is adequate to low-income borrowers and good to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 7.7 percent is lower than the 24.5 percent of low-income families in the MSA, but the bank's performance is higher than the 3.6 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 12 percent is lower than the 16.1 percent of moderate-income families, but is higher than the 11.1 percent performance for aggregate lenders.

Atlanta-Sandy Springs-Roswell, GA MSA

The distribution of home mortgage loans by borrower income in the Atlanta-Sandy Springs-Roswell, GA MSA is excellent. The distribution is good to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 11.6 percent is lower than the 21.8 percent of low-income families in the MSA, but it is higher than the 5.3 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 19.4 percent exceeds the 17.1 percent of moderate-income families in the MSA and it exceeds the 14.5 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Athens-Clarke County GA MSA	274	41,878	1.5	6,159	24.5	7.7	3.6	16.1	12.0	11.1	18.2	18.2	16.7	41.2	50.4	47.0	0.0	11.7	21.6
FS Atlanta-Sandy Springs-Roswell GA MSA	15,377	3,273,036	82.1	229,304	21.8	11.6	5.3	17.1	19.4	14.5	19.6	18.2	18.2	41.5	39.3	41.5	0.0	11.6	20.5
LS Brunswick GA MSA	219	58,856	1.2	3,700	23.8	8.2	2.9	16.5	10.0	9.1	19.8	15.5	14.5	40.0	51.1	54.5	0.0	15.1	19.1
LS Columbus GA MSA	267	36,802	1.4	5,935	21.1	9.7	3.4	16.1	19.5	9.5	18.8	18.0	16.4	44.0	34.1	39.1	0.0	18.7	31.6
LS Dalton GA MSA	149	14,445	0.8	2,783	22.3	4.7	2.8	17.6	32.2	20.6	21.1	19.5	18.5	39.0	34.2	38.6	0.0	9.4	19.5
LS Gainesville GA MSA	362	62,556	1.9	7,177	21.3	10.2	3.5	18.3	18.5	12.6	20.1	17.1	18.5	40.4	41.4	44.9	0.0	12.7	20.5
LS Georgia Non-MSA	246	32,470	1.3	5,414	18.7	4.5	2.0	15.3	10.2	9.0	17.4	21.5	19.1	48.5	48.0	47.9	0.0	15.9	22.0
LS Macon-Bibb County GA MSA	315	36,568	1.7	4,319	25.5	7.6	3.9	15.3	16.8	12.8	18.1	20.6	18.6	41.1	39.0	39.6	0.0	15.9	25.1
LS Savannah GA MSA	978	165,001	5.2	13,538	21.5	7.3	3.7	17.1	16.3	12.2	19.7	22.3	19.7	41.7	42.9	37.1	0.0	11.2	27.3
LS Valdosta GA MSA	241	31,141	1.3	3,774	22.5	5.8	4.0	18.6	12.9	11.0	18.4	20.7	19.4	40.5	46.9	35.9	0.0	13.7	29.7
LS Warner Robins GA MSA	296	41,801	1.6	6,573	21.8	12.5	5.1	17.8	21.3	12.8	19.9	22.6	19.8	40.5	29.4	32.3	0.0	14.2	29.9
Total	18,724	3,794,554	100.0	288,676	21.9	10.9	5.0	17.0	18.9	13.9	19.4	18.5	18.2	41.6	39.8	41.4	0.0	11.9	21.5

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Athens-Clarke County, GA MSA and Atlanta-Sandy Springs-Roswell, GA MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 30 percent of its small loans to businesses.

Athens-Clarke County, GA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Athens-Clarke County, GA MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 56.6 percent is lower than the 77.6 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 48.6 percent for aggregate lenders, overall performance is good.

Atlanta-Sandy Springs-Roswell, GA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Atlanta-Sandy Springs-Roswell, GA MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 60.2 percent is lower than

the 79.8 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is stronger than the 49.9 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Athens-Clarke County GA MSA	670	12,053	1.5	3,344	77.6	56.6	48.6	3.7	10.1	18.7	33.3
FS Atlanta-Sandy Springs-Roswell GA MSA	37,622	975,686	86.3	148,983	79.8	60.2	49.9	4.1	10.4	16.2	29.4
LS Brunswick GA MSA	468	11,326	1.1	2,236	77.5	51.3	48.3	3.6	11.5	18.9	37.2
LS Columbus GA MSA	264	3,907	0.7	3,298	75.5	58.3	47.5	4.7	7.2	19.8	34.5
LS Dalton GA MSA	294	10,992	0.7	1,691	73.9	44.6	44.8	6.4	24.8	19.8	30.6
LS Gainesville GA MSA	749	29,373	1.7	4,208	79.6	50.3	45.8	4.9	17.0	15.5	32.7
LS Georgia Non-MSA	411	7,767	0.9	2,924	76.4	51.8	48.1	3.9	11.9	19.7	36.3
LS Macon-Bibb County GA MSA	513	9,397	1.2	3,326	75.6	55.4	49.9	4.8	8.6	19.5	36.1
LS Savannah GA MSA	1,860	70,957	4.3	7,441	76.4	56.3	48.3	4.5	14.0	19.1	29.6
LS Valdosta GA MSA	385	7,131	0.9	2,196	75.8	56.1	46.2	4.5	8.6	19.8	35.3
LS Warner Robins GA MSA	361	6,125	0.9	2,041	76.7	55.7	51.6	3.2	10.0	20.1	34.3
Total	43,597	1,144,714	100.0	181,688	79.1	59.4	49.6	4.1	10.8	16.8	29.9

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good, driven by performance in the Atlanta-Sandy Springs-Roswell, GA MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 30 percent of its small loans to farms.

Athens-Clarke County, GA MSA

The bank made too few small loans to farms in the Athens-Clarke County, GA MSA to perform any meaningful analysis.

Atlanta-Sandy Springs-Roswell, GA MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Atlanta-Sandy Springs-Roswell, GA MSA is good. Based on farms with known revenues, the proportion of the bank's small loans to farms at 67 percent is lower than the 96 percent of farms with gross annual revenues of \$1 million or less. Considering the bank's distribution was higher than the 43 percent for aggregate lenders, performance is good.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Athens-Clarke County GA MSA	18	172	10.7	60	97.0	61.1	40.0	1.8	0.0	1.3	53.8
FS Atlanta-Sandy Springs-Roswell GA MSA	91	1,095	50.0	321	96.0	67.0	43.0	2.4	6.6	1.6	26.4
LS Brunswick GA MSA	10	310	6.1	24	97.4	70.0	58.3	1.0	0.0	1.6	42.9
LS Columbus GA MSA	2	16	1.6	42	96.0	100.0	57.1	2.0	0.0	2.0	0.0
LS Dalton GA MSA	2	12	3.3	14	94.8	50.0	14.3	3.2	0.0	2.0	50.0
LS Gainesville GA MSA	6	70	4.4	26	96.2	83.3	65.4	2.5	0.0	1.4	33.3
LS Georgia Non-MSA	3	29	1.6	99	97.7	100.0	64.6	0.9	0.0	1.4	0.0
LS Macon-Bibb County GA MSA	13	104	7.4	42	97.0	76.9	52.4	1.0	0.0	2.1	33.3
LS Savannah GA MSA	19	249	10.4	37	95.8	63.2	45.9	1.8	0.0	2.4	36.8
LS Valdosta GA MSA	12	107	6.6	92	95.2	50.0	52.2	3.2	0.0	1.5	50.0
LS Warner Robins GA MSA	7	693	5.9	55	96.4	66.7	45.5	3.0	50.0	0.6	42.9
Total	183	2,857	100.0	812	96.1	65.6	48.6	2.3	4.4	1.6	30.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect overall on the bank’s Lending Test performance in the state of Georgia. To help assess the bank’s capacity to lend, examiners compared the dollar volume of CD loans with the dollar volume of the bank’s net Tier 1 Capital allocated to the assessment area according to the assessment area’s proportion of deposits. The bank met the credit needs of its communities primarily through retail lending.

Athens-Clarke County, GA MSA

In the Athens-Clarke County, GA MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated one CD loan totaling \$44,118 that helped provide community services targeted to low- and moderate-income individuals. CD lending represents 0.06 percent of the allocated Tier 1 Capital.

Atlanta-Sandy Springs-Roswell, GA MSA

In the Atlanta-Sandy Springs-Roswell, GA MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated 21 CD loans totaling \$110.5 million that primarily helped provide 936 units of affordable housing. CD lending represents 3.4 percent of the allocated Tier 1 Capital, after considering \$3.4 billion in deposits from national corporations in which the deposits did not derive from the local community.

Examples of CD loans include:

- The bank provided \$5.5 million in construction financing to develop Allen Wilson Terrace Phase III, a 71-unit affordable multifamily housing project in Decatur, GA. This is the third phase of the redevelopment of the former public housing development, built in 1941. All units are restricted to incomes at or below 60 percent of the area median income.

- The bank provided \$3 million in funding to help form Appalachian Community Capital (ACC), an organization created by the Appalachian Regional Commission (ARC) along with 12 high-performing CDFI and non-CDFI funds. ARC created ACC primarily to increase the availability of capital to small businesses in chronically underserved areas of the 13-state Appalachian Region. Of the \$3 million commitment, the bank allocated more than \$529,000 specifically to the Atlanta-Sandy Springs-Roswell, GA MSA.
- The bank provided \$10.7 million in construction financing to develop Mallalieu Pointe, a 67-unit affordable multifamily housing project in East Point, GA. All units are restricted to incomes at or below 60 percent of the area median income. The area has a strong demand for affordable housing with occupancy rates at comparable properties ranging between 88 percent and 100 percent.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Georgia, lending under the MHA and HARP programs accounted for 70 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance varied across the limited-scope assessment areas. Performance in the Columbus, GA MSA, Gainesville, GA MSA, and Savannah, GA MSA is consistent with the excellent Lending Test performance in the state of Georgia. Performance in the Brunswick, GA MSA, Dalton, GA MSA, Macon-Bibb County, GA MSA, Valdosta, GA MSA, Warner Robins, GA MSA, and Georgia Non-MSA is weaker than the overall excellent Lending Test performance in the state of Georgia primarily due to lower levels of CD lending relative to the bank's financial capacity in those assessment areas.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test is good. Investment performance is poor in the Athens-Clark County MSA and excellent in the Atlanta-Sandy Springs-Roswell, GA MSA. Performance in limited-scope assessment areas has a negative effect on the state rating.

Athens-Clarke County, GA MSA

In the Athens-Clarke County, GA MSA, the bank has a poor level of CD investments. The bank made 32 CD investments during the current evaluation period totaling \$2.1 million. Approximately \$1.8 million or 89 percent of the current period investment dollars supported 15 units of affordable housing. In addition, the bank has five CD investments totaling \$430,000 made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$2.5 million or 3.6 percent of allocated Tier 1 Capital. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$1.8 million or 88 percent of the investment dollars.

Examples of community development investments include:

- The bank made two donations totaling \$200,000 to the Boys & Girls Clubs of Metro Atlanta, with a mission to save and change the lives of children and teens by providing a safe, positive, and engaging environment and programs that prepare and inspire them to achieve great futures. According to the organization and income information it collects through the membership application process, the average annual household income is \$27,000 and over half of the members live at or below the federal poverty level.
- The bank provided \$15,000 in grants to Mercy Housing, Inc., with a mission to create stable, vibrant, and healthy communities by developing financing and operating affordable housing for families, seniors, and people with special needs who lack the economic resources to access quality safe housing opportunities. According to the organization, 71 percent of all residents are families and the median family income is \$23,575. Mercy Housing is one of the nation's largest nonprofit affordable housing organizations. The organization used the grant funds, which is the amount specifically allocated to the Athens-Clarke County, GA MSA, to provide general operating support.
- The bank provided more than \$11,000 in grants to Project Open Hand, an organization that serves a 19-county service area with nutritional meals. According to the organization, more than 99 percent of those served live at or below 200 percent of the federal poverty level (equivalent to a household income at or below 68 percent of the area median income).

Atlanta-Sandy Springs-Roswell, GA MSA

In the Atlanta-Sandy Springs-Roswell, GA MSA, the bank has an excellent level of CD investments. The bank made 395 CD investments during the current evaluation period totaling \$341 million. Approximately \$294 million or 86 percent of the current period investment dollars supported more than 2,600 units of affordable housing. In addition, the bank has 152 CD investments totaling \$42.8 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$383.9 million or 11.9 percent of allocated Tier 1 Capital, after considering the \$3.9 billion in deposits that did not originate from the assessment area. The majority of

current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$220.4 million or 88 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$7.6 million in LIHTCs to support the construction of Abbington Trail Apartments, a 60-unit housing development for seniors to be located in Powder Springs, GA. The project will have 57 units restricted to incomes at or below 60 percent of the median area income. The bank also provided the construction loan.
- The bank invested \$7.3 million in LIHTCs to support the construction of Allen Wilson III, a 71-unit multifamily affordable housing project in Decatur, GA. This is the third phase of a redevelopment of a former public housing development built in 1941. Units are restricted to incomes at or below 60 percent of the area median income. The bank also provided the construction loan.
- The bank has \$37 million in deposits in Citizens Trust Bank (CTB), a minority-owned community development bank and certified CDFI and CDE. The U.S. Treasury's CDFI Bank Enterprise Award Program awarded funds to CTB, which is one of 77 national award recipients. The Treasury provides awards to organizations serving economically distressed communities where at least 30 percent of the population is living below the federal poverty rate and unemployment is 1.5 times above the national average. Bank of America has been a leader in helping CTB meet its mission to develop the community by providing capital to underserved borrowers in the Atlanta-Sandy Springs-Roswell, GA MSA.

QUALIFIED INVESTMENTS		Geography: GEORGIA				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Athens, GA	5	430	32	2,062	37	2,493	0.59	0	0	
Atlanta, GA	152	42,827	395	341,044	547	383,871	90.75	9	25,311	
Limited Review										
Brunswick, GA	3	2,582	17	459	20	3,041	0.72	0	0	
Columbus, GA	2	226	16	10,087	18	10,313	2.44	1	6,385	
Dalton, GA	3	127	26	1,795	29	1,923	0.45	0	0	
Gainesville, GA	3	118	18	799	21	918	0.22	0	0	
Macon, GA	7	395	34	1,595	41	1,990	0.47	0	0	
Savannah, GA	6	391	36	8,603	42	8,994	2.13	1	6,120	
Valdosta, GA	3	90	14	711	17	801	0.19	0	0	
Warner Robins, GA	3	274	13	575	16	850	0.20	0	0	
Georgia Non-MSA	2	260	21	942	23	1,202	0.28	0	0	
GEORGIA - Statewide	0	0	18	244	18	244	0.06	0	0	
GEORGIA - Non Assessed	32	2,044	72	4,335	104	6,379	1.51	0	0	
GEORGIA	221	49,765	712	373,253	933	423,018	100.00	11	37,817	

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance varied across the limited-scope assessment areas. Performance in the Georgia Non-MSA is consistent with the High Satisfactory Investment Test performance in the state of Georgia. Performance in the Brunswick, GA MSA and Columbus, GA MSA is stronger than the overall High Satisfactory Investment Test performance in the state of Georgia primarily due to higher levels of CD investments relative to the bank's financial capacity in those assessment areas. Performance in the Dalton, GA MSA, Gainesville, GA MSA, Macon-Bibb County, GA MSA, Savannah, GA MSA, Valdosta, GA MSA, and Warner Robins, GA MSA is weaker than the overall High Satisfactory Investment Test performance in the state of Georgia primarily due to limited or no CD investments in those communities.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Georgia is rated Outstanding. Service Test performance is excellent in the Athens-Clarke County, GA MSA and Atlanta-Sandy Springs-Roswell, GA MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Athens-Clarke County, GA MSA

In the Athens-Clarke County, GA MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's four financial centers with the distribution of the population along with the accessibility provided through alternative delivery systems. The bank has one financial center in a low-income geography and one financial center in a moderate-income geography each representing 25 percent of its financial centers. According to the 2010 U.S. Census data, approximately 15 percent of the area population resides in low-income geographies and approximately 16 percent resides in moderate-income geographies. Although the bank only has four financial centers, half are located in low- and moderate-income geographies, which exceeds the 31 percent of the population residing in low- and moderate-income geographies.

Examiners considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Alternative delivery systems have a positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of alternative delivery systems through income proxies based on customers' residency. The percentage of customers in low- and moderate-income

geographies using five of six alternative delivery systems exceeds 70 percent of the proportion of the population living in low- and moderate-income geographies.

The bank has one financial center in an upper-income census tract that is adjacent to or in very close proximity to a low-income census tract. This adjacent financial center helps improve access to retail banking services to individuals in low-income geographies.

The bank did not open or close any financial centers in the assessment area during the evaluation period.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Financial centers are generally open 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday. The Main Branch (low-income geography) is the only financial center not open for Saturday banking.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Athens-Clarke County GA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	8	17.4	28,038	14.6	1	25.0	4	25.0	0	0.0	0	0.0
Moderate	8	17.4	30,906	16.1	1	25.0	3	18.8	0	0.0	0	0.0
Middle	18	39.1	78,919	41.0	0	0.0	2	12.5	0	0.0	0	0.0
Upper	12	26.1	54,678	28.4	2	50.0	7	43.8	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	46	100.0	192,541	100.0	4	100.0	16	100.0	0	100.0	0	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Atlanta-Sandy Springs-Roswell, GA MSA

In the Atlanta-Sandy Springs-Roswell, GA MSA, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 134 financial centers with the distribution of the population along with the accessibility provided through alternative delivery systems. The bank has 7 financial centers in low-income geographies and 41 financial centers in moderate-income geographies each representing 5.2 percent and 30.6 percent of its financial centers. According to the 2010 U.S. Census data, approximately 6.2 percent of the area population resides in low-income geographies and approximately 23.7 percent resides in moderate-income geographies.

Alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of alternative delivery systems through income proxies based on customers’ residency. The percentage of customers in low- and moderate-income geographies using the five alternative delivery systems exceeds 70 percent of the proportion of the population living in low- and moderate-income geographies.

The bank has 21 financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to 4 low-income census tracts and 17 moderate-income census tracts. These adjacent financial centers help improve access to retail banking services to individuals in low- and moderate-income geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened three financial centers and closed ten. The bank closed two financial centers in low-income geographies, four in moderate-income geographies, and the remaining four in middle- and upper-income geographies. Despite the closures, service delivery systems remain readily accessible.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Financial centers are generally open 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday. Four financial centers (8 percent) in low- and moderate-income geographies are not open for Saturday banking.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Atlanta-Sandy Springs-Roswell GA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	93	9.8	327,813	6.2	7	5.2	26	5.0	0	0.0	2	20.0
Moderate	234	24.6	1,251,913	23.7	41	30.6	159	30.4	1	33.3	4	40.0
Middle	330	34.7	2,054,136	38.9	39	29.1	175	33.5	0	0.0	2	20.0
Upper	289	30.4	1,647,220	31.2	47	35.1	162	31.0	2	66.7	2	20.0
NA	5	0.5	5,646	0.1	0	0.0	1	0.2	0	0.0	0	0.0
Totals	951	100.0	5,286,728	100.0	134	100.0	523	100.0	3	100.0	10	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Athens-Clarke County, GA MSA

The bank provides a limited level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide nine community development services targeted to low- and moderate-income individuals. Employees provided eight financial education workshops for 216 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in one webinar with a non-profit organization to help the organization with capacity building. No employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Atlanta-Sandy Springs-Roswell, GA MSA

The bank is a leader in providing community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 1,191 community development services targeted to low- and moderate-income individuals.

Employees provided homebuyer education workshops to 1,051 low- and moderate-income individuals and provided 79 financial education and foreclosure prevention workshops for 2,640 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 47 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 15 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance varied across the limited-scope assessment areas. Performance in the Brunswick, GA MSA, Columbus, GA MSA, Gainesville, GA MSA, Macon-Bibb County, GA MSA, Warner Robins, GA MSA, and Georgia Non-MSA is consistent with the Outstanding Service Test performance in the state of Georgia. Performance in the Dalton, GA MSA, Savannah, GA MSA, and Valdosta, GA MSA is weaker than the overall Outstanding Service Test performance in the state of Georgia primarily due to weaker branch distribution.

State of Idaho

CRA Rating for Idaho²³:	Outstanding
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Excellent distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Idaho

The state of Idaho is Bank of America's 40th largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$827 million or less than 0.1 percent of its total domestic deposits in financial centers within the state of Idaho. Of the 31 depository financial institutions operating in the state, Bank of America, with a deposit market share of 3.6 percent, is the seventh largest. The bank's primary competitors for deposits in the state of Idaho with deposit market shares greater than 5 percent include Wells Fargo Bank, N.A. (23.7 percent), US Bank (17.8 percent), ZB Bank (6.3 percent), and Key Bank (6.3 percent). As of December 31, 2016, BANA operated three financial centers and five full-service ATMs in Idaho.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originate from the local community. In the Coeur d'Alene, ID MSA, Bank of America reported \$427.5 million in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these companies. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's financial capacity in the assessment area.

²³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the community profiles for the state of Idaho in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Idaho

The bank has defined one assessment area in the state of Idaho. Examiners selected the Coeur d'Alene, ID MSA for a full-scope review and it comprises 100 percent of the bank's deposits and lending in the state of Idaho.

During the evaluation period, Bank of America originated or purchased 864 home mortgage loans totaling \$176.5 million, 1,545 small loans to businesses totaling \$22.9 million, and 23 small loans to farms totaling \$163,000. Based on loan volume, examiners weighted small loans to businesses, representing 64 percent of the volume, the most followed by home mortgage loans at 36 percent. The bank originated or purchased too few small loans to farms for any meaningful analysis.

Examiners interviewed one local community development organization. According to the community contact, the top housing needs in the community are housing for first-time homebuyers and affordable rental housing, particularly for individuals with annual incomes between \$15,000 and \$20,000.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IDAHO

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Idaho is rated High Satisfactory, based on good lending activity, good geographic distribution, and good borrower income distribution.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the Coeur d'Alene, ID MSA is excellent.

Coeur d'Alene, ID MSA

Lending activity in the Coeur d'Alene, ID MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 29.9 percent. The bank ranks first among 14 depository financial institutions, which places it in the top 8 percent of institutions. Excluding the \$427.5 million in deposits derived from outside the assessment area, the bank's market share declines to 17.1 percent and it places it in the top 15 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.1 percent based on the number of home mortgage loans originated or purchased. The bank

ranks 20th among 235 home mortgage lenders, which places it in the top 9 percent of lenders. According to peer small business data for 2016, the bank has a 5.5 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fifth among 62 small business lenders, which places it in the top 9 percent of the lenders. The bank originated or purchased too few small loans to farms for any meaningful analysis. Considering the bank’s higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its adjusted deposit market share ranking, overall lending activity is excellent.

Table 1. Total Lending Volume											2012-2016	
LENDING VOLUME			Geography: IDAHO					Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Coeur d'Alene, ID	100.00	864	176,468	1,545	22,897	23	163	0	0	2,432	199,528	100.00
IDAHO	100.00	864	176,468	1,545	22,897	23	163	0	0	2,432	199,528	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is good in the Coeur d’Alene, ID MSA.

Coeur d’Alene, ID MSA

The geographic distribution of home mortgage loans in the Coeur d’Alene, ID MSA is good. Performance is good in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 1.7 percent is lower than the 2.1 percent of owner-occupied housing units in low-income geographies and it exceeds the 1.3 percent for aggregate lenders. The distribution in moderate-income geographies at 7.3 percent is lower than the 10.5 percent of owner-occupied housing units in moderate-income geographies and lower than the 9.4 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Coeur d Alene ID MSA	289	70,379	100.0	8,579	2.1	1.7	1.3	10.5	7.3	9.4	68.7	66.1	73.7	18.6	24.9	15.7	0.0	0.0	0.0
Total	289	70,379	100.0	8,579	2.1	1.7	1.3	10.5	7.3	9.4	68.7	66.1	73.7	18.6	24.9	15.7	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Coeur d’Alene, ID MSA.

Coeur d’Alene, ID MSA

The geographic distribution of small loans to businesses in the Coeur d’Alene, ID MSA is excellent. Performance is excellent in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 10.7 percent is consistent with the 10.6 percent of businesses in low-income geographies and it exceeds the 7.2 percent performance for aggregate lenders. The distribution in moderate-income geographies at 14.9 percent is lower than the 17.1 percent of businesses in moderate-income geographies, but it exceeds the 13.2 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Coeur d Alene ID MSA	945	13,796	100.0	5,547	10.6	10.7	7.2	17.1	14.9	13.2	55.8	57.7	58.8	16.5	16.7	20.9	0.0	0.0	0.0
Total	945	13,796	100.0	5,547	10.6	10.7	7.2	17.1	14.9	13.2	55.8	57.7	58.8	16.5	16.7	20.9	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The bank originated or purchased too few small loans to farms to provide any meaningful analysis.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS Coeur d Alene ID MSA	16	124	100.0	42	2.7	0.0	0.0	12.7	0.0	7.1	69.8	87.5	76.2	14.8	16.7	16.7	0.0	0.0	0.0
Total	16	124	100.0	42	2.7	0.0	0.0	12.7	0.0	7.1	69.8	87.5	76.2	14.8	16.7	16.7	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is excellent. The distribution is excellent in the Coeur d’Alene, ID MSA.

Coeur d’Alene, ID MSA

The distribution of home mortgage loans by borrower income in the Coeur d’Alene, ID MSA is excellent. The distribution is good to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 11.4 percent is lower than the 18.9 percent of low-income families in the MSA; however, the bank’s performance is higher than the 4.7 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 18.3 percent is slightly lower than the 19.6 percent of moderate-income families; however, it exceeds the 17 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Coeur d Alene ID MSA	289	70,379	100.0	8,579	18.9	11.4	4.7	19.6	18.3	17.0	21.3	19.0	23.0	40.1	42.2	37.0	0.0	9.0	18.3
Total	289	70,379	100.0	8,579	18.9	11.4	4.7	19.6	18.3	17.0	21.3	19.0	23.0	40.1	42.2	37.0	0.0	9.0	18.3

*Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Coeur d’Alene, ID MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 37 percent of its small loans to businesses.

Coeur d’Alene, ID MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Coeur d’Alene, ID MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 53.3 percent is lower than the 80.5 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 39.3 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Coeur d Alene ID MSA	945	13,796	100.0	5,547	80.5	53.3	39.3	4.9	10.2	14.5	36.5
Total	945	13,796	100.0	5,547	80.5	53.3	39.3	4.9	10.2	14.5	36.5

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The bank originated or purchased too few small loans to farms to provide any meaningful analysis.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Coeur d Alene ID MSA	16	124	100.0	42	97.2	25.0	50.0	2.0	0.0	0.8	75.0
Total	16	124	100.0	42	97.2	25.0	50.0	2.0	0.0	0.8	75.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect overall on the bank’s Lending Test performance in the state of Idaho. The bank met the community’s needs primarily through retail lending.

Coeur d’Alene, ID MSA

In the Coeur d’Alene, ID MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, Bank of America did not originate or purchase any CD loans within the Coeur d’Alene, ID MSA.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Idaho, lending under the MHA and HARP programs accounted for 94 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank’s level of qualified investments.

Bank of America’s performance under the Investment Test in the state of Idaho is rated Outstanding. Investment performance is excellent in the Coeur d’Alene, ID MSA.

Coeur d’Alene, ID MSA

In the Coeur d’Alene, ID MSA, Bank of America has an excellent level of CD investments. The bank made 34 CD investments during the current evaluation period totaling \$5.6 million. Approximately \$5.4 million or 98 percent of the current period investment dollars supported 28 units of affordable housing. In addition, the bank has 14 CD investments totaling \$560,000 it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$6.1 million or 12.2 percent of allocated Tier 1 Capital. The majority of current period investments are neither innovative

nor complex with mortgage-backed securities representing approximately \$5.4 million or 98 percent of the investment dollars.

Table 14. Qualified Investments								2012-2016		
QUALIFIED INVESTMENTS		Geography: IDAHO				Evaluation Period: January 1, 2012 to December 31, 2016				
		Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Coeur d'Alene, ID	14	560	34	5,562	48	6,122	40.87	0	0	
IDAHO - Statewide	0	0	13	48	13	48	0.32	0	0	
IDAHO - Non Assessed	33	5,133	37	3,677	70	8,811	58.81	0	0	
IDAHO	47	5,693	84	9,288	131	14,981	100.00	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 bank's financial reporting system.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Idaho is rated High Satisfactory. Service Test performance is good in the Coeur d'Alene, ID MSA.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Coeur d'Alene, ID MSA

In the Coeur d'Alene, ID MSA, the bank's service delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's three financial centers with the distribution of the population. The bank has one financial center in a low-income geography representing 33.3 percent of its financial centers. Approximately 3.5 percent of the population lives in low-income geographies. The bank has no financial centers in moderate-income geographies where 13.2 percent of the population lives.

Examiners also considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. The percentages of customers in low- and moderate-income geographies using ATMs, online, telephone, mobile, and text banking exceed the percentages of individuals in low- and moderate-income geographies.

The bank has one financial center in a middle-income census tract that is adjacent to or in very close proximity to a moderate-income census tract. The adjacent financial center helps improve access to retail banking services to individuals in moderate-income geographies.

Financial center openings and closings did adversely affect the accessibility of retail banking services, particularly in moderate-income geographies and to low- and moderate-income individuals. The bank closed two financial centers during the evaluation period. The bank closed one financial center in a moderate-income geography and one in a middle-income geography.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are more restrictive in moderate-income geographies. All three financial centers are open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 10:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Coeur d'Alene ID MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	1	4.0	4,782	3.5	1	33.3	2	40.0	0	0.0	0	0.0
Moderate	5	20.0	18,240	13.2	0	0.0	0	0.0	0	0.0	1	50.0
Middle	14	56.0	93,473	67.5	2	66.7	3	60.0	0	0.0	1	50.0
Upper	5	20.0	21,999	15.9	0	0.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	25	100.0	138,494	100.0	3	100.0	5	100.0	0	100.0	2	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Coeur d'Alene, ID MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 33 community development services targeted to low- and moderate-income individuals. Employees provided five financial education workshops for 678 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in three webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, one employee served on the board of a community organization. The types of CD services provided are responsive to the needs identified in the community.

State of Illinois

CRA Rating for Illinois²⁴:	Outstanding
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Good volume of loans originated or purchased within the assessment areas;
- Excellent distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively high level of CD lending that has a positive effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Illinois

The state of Illinois is Bank of America's seventh largest rating area based on its total deposits in the state when excluding the St. Louis, MO-IL Multistate MSA. Examiners excluded the St. Louis, MO-IL Multistate MSA from the analysis of the state of Illinois because examiners evaluated the multistate MSA as a separate rating area. As of June 30, 2016, the bank maintained approximately \$41.5 billion or 3.4 percent of its total domestic deposits in financial centers in areas of the state of Illinois that do not include the multistate MSA. Of the 508 depository financial institutions operating in the portion of the state of Illinois that excludes the multistate MSA, Bank of America, with a deposit market share of 9 percent, is the third largest. Competitors with deposit market shares greater than 5 percent include JP Morgan Chase Bank (18.3 percent), BMO Harris Bank (11.4 percent), and the Northern Trust Company (6.3 percent). The state of Illinois is the bank's seventh largest rating area for the bank's total domestic deposits. As of December 31, 2016, the bank operated 158 financial centers and 398 ATMs in the portion of Illinois that excludes the multistate MSA.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Chicago-Naperville-Elgin, IL MSA, Bank of America reported an additional \$12.3 billion in deposits of national corporations, in which the funds originated from communities across the

²⁴ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

Refer to the community profiles for the state of Illinois in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Illinois

The bank has defined two assessment areas in the state of Illinois. Examiners selected the Chicago-Naperville-Elgin, IL MSA for a full-scope review and the Rockford, IL MSA for a limited-scope review. The Chicago-Naperville-Elgin, IL MSA accounts for 99.8 percent of the bank's deposits within the state of Illinois. During the evaluation period, Bank of America originated or purchased 41,110 home mortgage loans totaling \$10.1 billion, 45,842 small loans to businesses totaling \$1.5 billion, 122 small loans to farms totaling \$1.5 million, and 55 CD loans totaling \$343.4 million. Lending volumes include loans originated or purchased in the Illinois Non-MSA assessment area (Adams County), which the bank no longer designates as an assessment area due to the bank's closure or sale of all financial centers and deposit-taking ATMs in the county. Based on loan volume, examiners weighted small loans to businesses, representing 53 percent of the volume, the most followed by home mortgage loans at 47 percent, and small loans to farms at less than 1 percent.

Examiners conducted interviews with two local community organizations representing housing and policy research. The community contacts identified the following as some of the most pressing needs in their communities: mortgage loans, small loans to businesses, and bank branches in low- and moderate-income neighborhoods in Chicago. The perception is that banks have avoided low- and moderate-income neighborhoods in favor of neighborhoods where banks can originate larger loan amounts that are more profitable. A nonprofit CDFI with a 43 percent market share in a community further illustrates the absence of banks in the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Illinois is rated Outstanding, based on good lending activity, excellent geographic distribution, good borrower income distribution, and relatively high levels of CD lending that have a positive effect on the Lending Test rating. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank’s lending activity in the state of Illinois is good. Lending activity is good in the Chicago-Naperville-Elgin, IL MSA and excellent in the limited-scope assessment area.

Chicago-Naperville-Elgin, IL MSA

Lending activity in the Chicago-Naperville-Elgin, IL MSA is good. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 11 percent. The bank ranks third among 181 depository financial institutions in the assessment area, which places it in the top 2 percent of institutions. Adjusting for the \$12.3 billion in corporate deposits, the bank’s deposit market share would decline to 8 percent, but its ranking would remain unchanged. According to peer mortgage data for 2016, the bank has a market share of 1.7 percent based on the number of home mortgage loans originated or purchased. The bank ranks 10th among 906 home mortgage lenders, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has a 5.2 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks sixth among 217 small business lenders, which places it in the top 3 percent of lenders. For small loans to farms, the bank has a market share of 1.9 percent based on the number of small loans to farms originated or purchased. The bank ranks 13th among 43 farm lenders, which places it in the top 31 percent of lenders. Considering the bank’s ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is good.

LENDING VOLUME		Geography: ILLINOIS						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Chicago, IL	97.68	39,936	9,995,978	45,016	1,466,379	105	1,189	54	333,832	85,111	11,797,378	99.82
Limited Review												
Rockford, IL	2.13	1,118	124,896	728	12,595	9	54	1	9,600	1,856	147,145	0.18
Illinois Non-MSA	0.19	56	6,146	98	1,626	8	253	0	0	162	8,025	0.00
ILLINOIS	100.00	41,110	10,127,020	45,842	1,480,600	122	1,496	55	343,432	87,129	11,952,548	100.00
(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.												
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.												
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.												

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is good in the Chicago-Naperville-Elgin, IL MSA.

Chicago-Naperville-Elgin, IL MSA

The geographic distribution of home mortgage loans in the Chicago-Naperville-Elgin, IL MSA is good. Performance is good in low-income geographies and good in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 2.8 percent is lower than the 3.8 percent of owner-occupied housing units in low-income geographies; however, it exceeds the 2.5 percent for aggregate lenders. The distribution in moderate-income geographies at 12.6 percent is lower than the 17.4 percent of owner-occupied housing units in moderate-income geographies; however, it exceeds the 12.3 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Chicago-Naperville-Elgin IL-IN-WI MSA	13,853	4,104,472	97.6	300,156	3.8	2.8	2.5	17.4	12.6	12.3	38.4	33.5	35.8	40.4	51.1	49.4	0.0	0.0	0.0
LS Rockford IL MSA	336	36,783	2.4	8,889	4.0	4.8	1.4	19.2	20.2	13.0	45.6	46.4	47.8	31.2	28.6	37.9	0.0	0.0	0.0
Total	14,189	4,141,255	100.0	309,045	3.8	2.8	2.4	17.5	12.8	12.4	38.7	33.8	36.2	40.0	50.6	49.0	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Chicago-Naperville-Elgin, IL MSA.

Chicago-Naperville-Elgin, IL MSA

The geographic distribution of small loans to businesses in the Chicago-Naperville-Elgin, IL MSA is excellent. The distribution is good in low-income geographies and excellent in moderate-income geographies. The geographic distribution in low-income geographies at 3.1 percent is lower than the 4.3 percent of businesses in low-income geographies and it is slightly lower than the 3.3 percent performance for aggregate lenders. The geographic distribution in moderate-income geographies at 17.2 percent is higher than the 15.2 percent of businesses in

moderate-income geographies and it exceeds the 14.4 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Chicago-Naperville-Elgin IL-IN-WI MSA	30,638	890,906	98.6	218,120	4.3	3.1	3.3	15.2	17.2	14.4	33.4	35.9	33.7	46.9	43.7	48.5	0.1	0.1	0.1
LS Rockford IL MSA	450	7,341	1.4	4,011	6.4	6.7	6.1	19.5	14.4	17.8	45.6	42.7	45.7	27.9	36.0	30.0	0.5	0.8	0.3
Total	31,088	898,247	100.0	222,131	4.4	3.2	3.3	15.4	17.1	14.5	33.8	36.0	34.0	46.3	43.6	48.2	0.1	0.1	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is adequate. The distribution is adequate in the Chicago-Naperville-Elgin, IL MSA.

Chicago-Naperville-Elgin, IL MSA

The geographic distribution of small loans to farms in the Chicago-Naperville-Elgin, IL MSA is adequate, based on poor performance in low-income geographies and adequate performance in moderate-income geographies. The bank did not originate or purchase small loans to farms in low-income geographies where 2.4 percent of the farms are located. The performance for aggregate lenders was 0.7 percent. The geographic distribution in moderate-income geographies at 6.3 percent is lower than the 12.3 percent of farms in moderate-income geographies; however, it exceeds the 5.3 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Chicago-Naperville-Elgin IL-IN-WI MSA	66	696	100.0	846	2.4	0.0	0.7	12.3	6.3	5.3	44.4	48.5	68.1	40.9	50.0	25.9	0.0	0.0	0.0
LS Rockford IL MSA	4	23	11.1	87	1.8	0.0	0.0	10.4	0.0	4.6	56.3	75.0	57.5	31.2	33.3	37.9	0.2	0.0	0.0
Total	70	719	100.0	933	2.3	0.0	0.6	12.1	6.3	5.3	45.4	50.0	67.1	40.1	48.6	27.0	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Chicago-Naperville-Elgin, IL MSA.

Chicago-Naperville-Elgin, IL MSA

The distribution of home mortgage loans by borrower income in the Chicago-Naperville-Elgin, IL MSA is good. The distribution is adequate to low-income borrowers and good to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 7.8 percent is lower than the 22.1 percent of low-income families in the MSA; however, it exceeds the 5.2 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 13.6 percent is lower than the 16.8 percent of moderate-income families in the MSA and it is slightly higher than the 13.5 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Chicago-Naperville-Elgin IL-IN-WI MSA	13,853	4,104,472	97.6	300,156	22.1	7.8	5.2	16.8	13.6	13.5	19.7	18.5	19.8	41.4	46.8	46.4	0.0	13.3	15.2
LS Rockford IL MSA	336	36,783	2.4	8,889	21.6	14.3	5.5	17.5	17.6	16.8	21.8	19.3	20.1	39.1	21.1	35.6	0.0	27.7	21.9
Total	14,189	4,141,255	100.0	309,045	22.1	7.9	5.2	16.8	13.7	13.6	19.7	18.5	19.8	41.3	46.2	46.1	0.0	13.7	15.4

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Chicago-Naperville-Elgin, IL MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 28 percent of its small loans to businesses.

Chicago-Naperville-Elgin, IL MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Chicago-Naperville-Elgin, IL MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 58.9 percent is lower than the 75.7 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 39.6 percent for aggregate lenders, overall performance is good.

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
FS Chicago-Naperville-Elgin IL-IN-WI MSA	30,638	890,906	98.6	218,120	75.7	58.9	39.6	7.1	12.8	17.2	28.3
LS Rockford IL MSA	450	7,341	1.5	4,011	75.4	50.7	41.5	6.9	16.0	17.7	33.3
Total	31,088	898,247	100.0	222,131	75.7	58.8	39.6	7.1	12.9	17.2	28.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The distribution is adequate in the Chicago-Naperville-Elgin, IL MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 33 percent of its small loans to farms.

Chicago-Naperville-Elgin, IL MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Chicago-Naperville-Elgin, IL MSA is adequate. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 54.5 percent is lower than the 92.2 percent of farms with gross annual revenues of \$1 million or less. The bank’s distribution slightly exceeds the 53.1 percent for aggregate lenders.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Chicago-Naperville-Elgin IL-IN-WI MSA	66	696	94.3	846	94.2	54.5	53.1	3.6	13.6	2.2	31.8
LS Rockford IL MSA	4	23	11.1	87	97.0	50.0	50.6	1.7	0.0	1.3	66.7
Total	70	719	100.0	933	94.5	54.3	52.8	3.4	12.9	2.1	32.9

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a positive effect overall on the bank’s Lending Test performance in the state of Illinois.

Chicago-Naperville-Elgin, IL MSA

In the Chicago-Naperville-Elgin, IL MSA, CD lending has a positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated 54 CD loans totaling \$333.8 million that primarily helped provide 1,820 units of affordable housing. CD lending represents 9.1 percent of the allocated Tier 1 Capital, after considering \$12.3 billion in deposits from national corporations in which the deposits did not derive from the local community.

Examples of CD loans include:

- The bank provided its annual commitment of \$18 million in funding to the Community Investment Corporation (CIC), which is a certified CDFI. The consortium provides funding for permanent loans on revitalized low- and moderate-income housing throughout Chicago. Bank of America’s \$72 million total commitment is the largest total dollar commitment in the CIC.
- The bank provided \$11.8 million in construction financing for the rehabilitation of 201 units of public housing under the HUD Rental Assistance Demonstration Conversion Program to Project-Based Section 8 housing in Evanston, IL. The project consists of two separate public housing developments. All units except two reserved for the onsite property managers are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$16.1 million in acquisition and construction financing for the complete gut rehabilitation of a 20-story former public housing building named “Fannie Emanuel Apartments” in Chicago, IL. The completed 181-unit building will have 180 units restricted to seniors aged 62 and over with incomes up to 60 percent of the area median income. One unit is reserved for the onsite property manager.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s

Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Illinois, lending under the MHA and HARP programs accounted for 84 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Rockford, IL MSA is consistent with the Outstanding Lending Test performance in the state of Illinois.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Illinois is rated Outstanding. Investment performance is excellent in the Chicago-Naperville-Elgin, IL MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Chicago-Naperville-Elgin, IL MSA

In the Chicago-Naperville-Elgin, IL MSA, the bank has an excellent level of CD investments. The bank made 651 CD investments during the current evaluation period totaling \$457.3 million. Approximately \$419.2 million or 92 percent of the current period investment dollars supported nearly 3,900 units of affordable housing. In addition, the bank has 148 CD investments totaling \$118 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$575.4 million or 15.7 percent of allocated Tier 1 Capital, after considering the \$12.3 billion in deposits that did not originate from the assessment area. The majority of current period investments are innovative or complex with LIHTCs and New Markets Tax Credits representing approximately \$243.8 million or 53 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$9.6 million in a LIHTC to fund the substantial rehabilitation and historic preservation of the 1704 N. Humboldt project located in the Humboldt Park neighborhood of Chicago, IL. The 1920's courtyard building has 29 units of affordable housing. The development has all units occupied and under Section 8 contracts.
- The bank invested \$12 million in a LIHTC for the construction of 65th Infantry Regiment Veterans Housing, a new 49-unit multifamily housing project in Chicago, IL. All units, except one reserved for the onsite property manager, are restricted to veterans and families with incomes at or below 60 percent of the area median income.

- The bank invested \$3.2 million in a joint venture to acquire investments in partnerships that own affordable housing projects financed with LIHTCs. This \$3.2 million represents the portion of funding applied toward the Amberton Apartments LIHTC project, located in Bolingbrook, IL.

QUALIFIED INVESTMENTS		Geography: ILLINOIS				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Chicago, IL	148	118,129	651	457,316	799	575,445	98.28	15	77,527	
Limited Review										
Rockford, IL	4	50	16	424	20	474	0.08	0	0	
ILLINOIS - Statewide	0	0	20	148	20	148	0.03	0	0	
ILLINOIS - Non Assessed	35	6,239	35	3,208	70	9,447	1.61	0	0	
ILLINOIS	187	124,418	722	461,097	909	585,515	100.00	15	77,527	

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Rockford, IL MSA is weaker than the overall Outstanding Investment Test performance in the state of Illinois primarily due to lower levels of CD investments relative to the bank's size and resources in the assessment area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Illinois is rated High Satisfactory. Service Test performance is good in the Chicago-Naperville-Elgin, IL MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Chicago-Naperville-Elgin, IL MSA

In the Chicago-Naperville-Elgin, IL MSA, the bank's service delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 157 financial centers with the distribution of the population. The bank has 9 financial centers or 5.7 percent of its financial centers in low-income geographies where 8.7 percent of the population lives. The bank has 27 financial

centers or 17.2 percent of its financial centers located in moderate-income geographies where 23 percent of the population lives.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The proportions of customers in low- and moderate-income geographies using ATM, telephone, mobile, and text banking exceed the proportion of the population in low- and moderate-income geographies.

The bank has 20 financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to moderate-income census tracts. These financial centers provide additional access to individuals and businesses in moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of service delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened five financial centers and closed twenty-five. The bank closed four financial centers in moderate-income geographies and the remaining twenty-one in middle- and upper-income geographies.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are more restrictive in moderate-income geographies. Financial centers are generally open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Chicago-Naperville-Elgin IL-IN-WI MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	255	12.7	750,938	8.7	9	5.7	32	8.1	0	0.0	0	0.0
Moderate	466	23.1	1,978,920	23.0	27	17.2	94	23.7	1	20.0	4	16.0
Middle	654	32.5	2,971,692	34.6	47	29.9	116	29.2	3	60.0	12	48.0
Upper	632	31.4	2,880,652	33.5	74	47.1	155	39.0	1	20.0	9	36.0
NA	7	0.3	4,407	0.1	0	0.0	0	0.0	0	0.0	0	0.0
Totals	2,014	100.0	8,586,609	100.0	157	100.0	397	100.0	5	100.0	25	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Chicago-Naperville-Elgin, IL MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 288 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 4 low- and moderate-income individuals and provided 16 financial education and foreclosure prevention workshops for 1,042 individuals. Employees provided 216 income tax preparation services and

participated in 47 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, five employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Rockford, IL MSA is weaker than the overall High Satisfactory Service Test performance in the state of Illinois. Performance is weaker primarily due to the weaker distribution of financial centers. The bank has only one financial center in the assessment area, which is located in an upper-income census tract.

State of Iowa

CRA Rating for Iowa²⁵: **Outstanding**
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the rating area;
- Excellent distribution of loans by geography and good distribution by borrower income or business revenue size;
- Relatively high level of CD lending, which has a positive effect on the overall Lending Test rating;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and to low- and moderate-income individuals.

Description of Institution's Operations in Iowa

The state of Iowa is Bank of America's 38th largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$866 million or less than 0.1 percent of its total domestic deposits in financial centers within the state of Iowa. Of the 331 depository financial institutions operating in the state, Bank of America, with a deposit market share of 1.1 percent, is the 15th largest. The bank's primary banking competitors with deposit market shares greater than 5 percent include Wells Fargo Bank (8.9 percent) and U.S. Bank (7.1 percent). As of December 31, 2016, BANA operated four financial centers and six full-service ATMs in Iowa.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Des Moines-West Des Moines, IA MSA, Bank of America reported \$46.6 million in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

²⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the community profiles for the state of Iowa in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Iowa

The bank has defined the Des Moines-West Des Moines, IA MSA as its only assessment area in the state of Iowa. Examiners reviewed the Des Moines-West Des Moines, IA MSA as a full-scope assessment area.

During the evaluation period, Bank of America originated or purchased 1,981 home mortgage loans totaling \$266.4 million, 2,241 small loans to businesses totaling \$57.9 million, 55 small loans to farms totaling \$482,000, and 2 CD loans totaling \$10 million. Lending volumes include loans originated or purchased in the Iowa Non-MSA assessment area (Cerro Gordo County), which the bank no longer designates as an assessment area due to the bank's closure or sale of all financial centers and deposit-taking ATMs in the county. Based on loan volume, small loans to businesses represented 52 percent of the volume while home mortgage loans represented 46 percent of the volume. Therefore, examiners weighted loans to small businesses more than home mortgage loans. Small loans to farms represented 1.3 percent of the total volume by number and therefore examiners weighted them the least.

Examiners interviewed one local community development organization to gain insight on the needs of the community. According to the contact, some neighborhoods such as Eagle Hill and King Irving are suffering from years of disinvestment even as economic conditions have improved for other neighborhoods. The neighborhoods need investments to improve the housing stock. The community also needs affordable banking services and small dollar loans for consumers.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IOWA

LENDING TEST

Bank of America's performance under the Lending Test in the state of Iowa is rated Outstanding, based on excellent lending activity, excellent geographic distribution, good borrower income distribution, and a relatively high level of CD lending that positively affects the Lending Test rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Iowa is excellent. Lending activity is good in the Des Moines-West Des Moines, IA MSA.

Des Moines-West Des Moines, IA MSA

Lending activity in the Des Moines-West Des Moines, IA MSA is excellent. According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 5.2 percent. The

bank ranks sixth among 50 depository financial institutions in the assessment area, which places it in the top 12 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 0.4 percent based on the number of home mortgage loans originated or purchased. The bank ranks 45th among 394 home mortgage lenders, which places it in the top 12 percent of lenders. According to peer small business lending data for 2016, the bank has a market share of 3.9 percent based on the number of small loans to businesses originated or purchased. The bank ranks ninth among 95 small business lenders, which places it in the top 10 percent of lenders. According to peer small farm lending data for 2016, the bank has a market share of 2.8 percent based on the number of small loans to farms originated or purchased. The bank ranks eighth among 23 farm lenders, which places the bank in the top 35 percent of lenders. Considering the bank’s ranking for each loan category relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: IOWA						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Des Moines, IA	93.97	1,814	249,822	2,153	57,090	52	410	2	10,047	4,021	317,369	100.00
Limited Review												
low a Non-MSA	6.03	167	16,562	88	855	3	72	0	0	258	17,489	0.00
IOWA	100.00	1,981	266,384	2,241	57,945	55	482	2	10,047	4,279	334,858	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business lending, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of home mortgage loans.

The geographic distribution of home mortgage loans is excellent. The distribution is excellent in the Des Moines-West Des Moines, IA MSA.

Des Moines-West Des Moines, IA MSA

The geographic distribution of home mortgage loans in the Des Moines-West Des Moines, IA MSA is excellent. Performance is excellent in low-income geographies and good in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 2.9 percent is higher than the 2.3 percent of owner-occupied housing units and it exceeds the 1.6 percent for aggregate lenders. The distribution in moderate-income geographies at 15.8 is

lower than the 19.9 percent of owner-occupied housing units; however, it exceeds the 12.1 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Des Moines-West Des Moines IA MSA	621	91,330	100.0	33,529	2.3	2.9	1.6	19.9	15.8	12.1	46.6	43.8	45.7	31.2	37.5	40.6	0.0	0.0	0.0
Total	621	91,330	100.0	33,529	2.3	2.9	1.6	19.9	15.8	12.1	46.6	43.8	45.7	31.2	37.5	40.6	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Des Moines-West Des Moines, IA MSA.

Des Moines-West Des Moines, IA MSA

The geographic distribution of small loans to businesses in the Des Moines-West Des Moines, IA MSA is excellent. The distribution is good in low-income geographies and excellent in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 7.7 percent is lower than the 10.2 percent of businesses operating in low-income geographies, but is higher than the 7 percent for aggregate lenders. The proportion of the bank’s small loans to businesses in moderate-income geographies at 17 percent is equal to the percentage of businesses in moderate-income geographies and it is higher than the 14.3 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Des Moines-West Des Moines IA MSA	1,238	31,845	100.0	11,293	10.2	7.7	7.0	17.0	17.0	14.3	41.6	38.3	41.6	31.0	37.0	37.0	0.1	0.0	0.0
Total	1,238	31,845	100.0	11,293	10.2	7.7	7.0	17.0	17.0	14.3	41.6	38.3	41.6	31.0	37.0	37.0	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to farms.

The geographic distribution of small loans to farms is adequate overall. The distribution is adequate in the Des Moines-West Des Moines, IA MSA.

Des Moines-West Des Moines, IA MSA

The geographic distribution of small loans to farms in the Des Moines-West Des Moines, IA MSA is adequate in both low-income and moderate-income geographies. The proportion of the bank’s small loans to farms in low-income geographies at 0 percent is lower than the 1.4 percent of farms in low-income geographies and lower than the 0.9 percent for aggregate lenders. Considering very few farms are located in low-income geographies, indicating few opportunities to make a loan, performance is adequate. The bank’s proportion of small loans to farms in moderate-income geographies at 11.1 percent is lower than the 14.4 percent of farms located in moderate-income geographies and lower than the 16.9 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
FS Des Moines-West Des Moines IA MSA	29	236	100.0	320	1.4	0.0	0.9	14.4	11.1	16.9	62.8	65.5	66.6	21.4	31.0	15.6	0.0	0.0	0.0
Total	29	236	100.0	320	1.4	0.0	0.9	14.4	11.1	16.9	62.8	65.5	66.6	21.4	31.0	15.6	0.0	0.0	0.0

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data: 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business lending, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The distribution of home mortgage loans by borrower income is good overall.

Des Moines-West Des Moines, IA MSA

The distribution of home mortgage loans by borrower income in the Des Moines-West Des Moines, IA MSA is good to low-income borrowers and excellent to moderate-income

borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 15.5 percent is lower than the 19.6 percent of low-income families and it is higher than the 7.8 percent for aggregate lenders. The proportion of the bank’s home mortgage loans to moderate-income borrowers at 23 percent exceeds the 18 percent of moderate-income families and it exceeds the 17.5 percent for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Des Moines-West Des Moines IA MSA	621	91,330	100.0	33,529	19.6	15.5	7.8	18.0	23.0	17.5	22.9	20.6	21.6	39.5	31.7	36.5	0.0	9.2	16.6
Total	621	91,330	100.0	33,529	19.6	15.5	7.8	18.0	23.0	17.5	22.9	20.6	21.6	39.5	31.7	36.5	0.0	9.2	16.6

Source: 2010 U.S Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The bank did not collect or consider the business gross annual revenues in the underwriting of approximately 36 percent of its small loans to businesses

Des Moines-West Des Moines, IA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Des Moines-West Des Moines, IA MSA is good. Based on businesses with known revenues, the proportion of small loans to businesses with gross annual revenues of \$1 million or less at 51.7 percent is lower than the 76.8 percent of businesses with gross annual revenues of \$1 million or less. The bank’s performance is higher than the 43.1 percent for aggregate lenders.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Des Moines-West Des Moines IA MSA	1,238	31,845	100.0	11,293	76.8	51.7	43.1	5.4	12.8	17.8	35.5
Total	1,238	31,845	100.0	11,293	76.8	51.7	43.1	5.4	12.8	17.8	35.5

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The bank did not collect or consider the business gross annual revenues in the underwriting of approximately 52 percent of its small loans to farms.

Des Moines-West Des Moines, IA MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Des Moines-West Des Moines, IA MSA is adequate. Based on farms with known revenues, the proportion of small loans to farms with gross annual revenues of \$1 million or less at 48.3 percent is lower than the 97.9 percent of farms with gross annual revenues of \$1 million or less. The bank’s performance is lower than the 52.2 percent for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Des Moines-West Des Moines IA MSA	29	236	100.0	320	97.9	48.3	52.2	1.3	0.0	0.8	51.7
Total	29	236	100.0	320	97.9	48.3	52.2	1.3	0.0	0.8	51.7

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data: 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending in the Des Moines-West Des Moines, IA MSA is excellent and has a positive effect on the Lending Test rating in the state of Iowa.

Des Moines-West Des Moines, IA MSA

During the assessment period, the bank originated two CD loans totaling \$10 million that financed projects providing 85 units of affordable housing within the Des Moines-West Des Moines, IA MSA. CD lending represents 9.8 percent of the allocated Tier 1 Capital, after considering \$46.6 million in deposits from national corporations in which the deposits did not derive from the local community.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as Affordable Loan Solutions and Business Advantage Credit Line. The Affordable Loan Solution mortgage product is a conforming loan that features a fixed rate, low down payment, no mortgage insurance, and non-traditional credit. Bank of America collaborated with Federal Home Loan Mortgage Corporation and Self Help Ventures to define credit terms and roll out to low and moderate income homebuyers. For small business owners, the bank introduced the Business Advantage Credit Line that provides working capital with no collateral required. The Business Advantage Credit Line provides cash flow for longer term financing in larger amounts than a typical credit card. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Iowa, lending under the MHA and HARP programs accounted for 86 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test in the state of Iowa is rated Outstanding based on excellent performance in the Des Moines-West Des Moines, IA MSA.

During the current evaluation period, the bank made 18 community development investments totaling \$22.9 million in the Des Moines-West Des Moines, IA MSA. Recipients of the current period investments used almost 100 percent of the investment dollars to help provide more than 250 units of affordable housing. In addition, the bank has 46 community development investments totaling \$4.7 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$27.6 million or 25.4 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$21 million or 92 percent of the investment dollars.

The bank also provided \$40,000 in investments to organizations within the state that have the potential to benefit the Des Moines-West Des Moines, IA MSA and \$5 million to organizations within the state that have no potential to benefit the assessment area. The investments that have no potential to benefit the assessment area are only considered if the bank has adequately met the credit needs of its assessment area.

Examples of community development investments include:

- The bank purchased \$8 million in LIHTCs to facilitate the construction of Alice Place, a 59-unit mixed income housing development for seniors in Waukee, IA. Bank of America also provided the construction financing. The project has 55 units of affordable housing that are restricted to incomes at or below 60 percent of the area median income.
- The bank purchased \$4.2 million in LIHTCs to help finance the acquisition and rehabilitation of Bloomsbury Village, an existing two building property with 30 affordable housing units in Des Moines, IA. Bank of America also provided the acquisition and rehabilitation financing.

QUALIFIED INVESTMENTS		Geography: IOWA				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Des Moines, IA	46	4,725	18	22,866	64	27,591	82.53	2	778
IOWA - Statewide	0	0	14	40	14	40	0.12	0	0
IOWA - Non Assessed	27	798	29	5,004	56	5,802	17.35	0	0
IOWA	73	5,523	61	27,910	134	33,432	100.00	2	778
(*) '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 bank's financial reporting system.									

SERVICE TEST

Bank of America's performance under the Service Test in the state of Iowa is rated Outstanding, based on excellent performance in the Des Moines-West Des Moines, IA MSA.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Des Moines-West Des Moines, IA MSA

The bank's service delivery systems in the Des Moines-West Des Moines, IA MSA are readily accessible to geographies and individuals of different income levels, based on a comparison of the bank's four financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has one financial center, representing 25 percent of its financial centers, located in a low-income census tract where 4.6 percent of the population lives. The bank has two financial centers in moderate-income geographies where 22.3 percent of the population lives.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank's products and services. Approximately 24 percent of LMI customers use alternate banking methods with the majority making use of telephone and mobile banking. Alternative delivery systems have a significantly positive effect on the retail banking services conclusion.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, BANA closed two financial centers. The bank closed one financial center in a low-income geography and one financial center in a middle-income geography. Despite the financial center closure in a low-income geography, the bank still has 25 percent of its branches located in a low-income geography.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies and to low- and

moderate-income individuals. The bank offers a wide array of products and services. Banking hours are generally consistent throughout the assessment area. Financial center lobby hours are 9:00 am to 5:00 pm Monday through Friday and 9:00 am to 12:00 pm on Saturday. Lobby hours are slightly different for the financial center located in a low-income geography. The financial center located in a low-income geography opens later at 10:00 am on Tuesday, Wednesday, and Thursday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Des Moines-West Des Moines IA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	8	6.1	26,303	4.6	1	25.0	1	16.7	0	0.0	1	50.0
Moderate	33	25.2	127,267	22.3	2	50.0	4	66.7	0	0.0	0	0.0
Middle	59	45.0	251,453	44.1	0	0.0	0	0.0	0	0.0	1	50.0
Upper	30	22.9	164,610	28.9	1	25.0	1	16.7	0	0.0	0	0.0
NA	1	0.8	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	131	100.0	569,633	100.0	4	100.0	6	100.0	0	100.0	2	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Des Moines-West Des Moines, IA MSA

The bank provides a relatively high level of community development services in the Des Moines-West Des Moines, IA MSA. During the evaluation period, the bank participated with community development organizations to provide 35 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 5 low- and moderate-income individuals and provided 11 financial education workshops for 223 individuals. Employees participated in nine webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 11 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

State of Kansas

CRA Rating for Kansas²⁶:	Outstanding
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>Outstanding</u>

The major factors that support this rating include:

- Adequate volume of loans originated or purchased within the assessment areas;
- Excellent distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Kansas

The state of Kansas is Bank of America's 29th largest rating area based on its total deposits in the state when excluding deposits in the Kansas City, MO-KS Multistate MSA. Examiners excluded the Kansas City, MO-KS Multistate MSA from the analysis of the state of Kansas because examiners evaluated the multistate MSA as a separate rating area. As of June 30, 2016, the bank maintained approximately \$4.1 billion or 0.3 percent of its total domestic deposits in financial centers in areas of the state of Kansas that excludes the multistate MSA. Of the 273 depository financial institutions operating in the state of Kansas that excludes the multistate MSA, Bank of America, with a deposit market share of 8.5 percent, is the largest. Competitors with deposit market shares greater than 5 percent include Intrust Bank (6.3 percent) and Capitol Federal Savings Bank (5.8 percent). As of December 31, 2016, the bank operated 17 financial centers and 36 ATMs in the portion of the state of Kansas that excludes the Kansas City, MO-KS Multistate MSA.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Wichita, KS MSA, Bank of America reported an additional \$1.1 billion in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the

²⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

Refer to the community profiles for the state of Kansas in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Kansas

Examiners selected two assessment areas for full-scope reviews and the remaining two assessment areas for limited-scope reviews. The full-scope assessment areas selected were the Topeka, KS MSA and Wichita, KS MSA. While the Wichita, KS MSA carries approximately 90 percent weight of the overall conclusions based on the bank's deposit presence there relative to all assessment areas in Kansas, the conclusions and ratings for the state are based on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 4,683 home mortgage loans totaling \$547 million, 4,979 small loans to businesses totaling \$132.5 million, 142 small loans to farms totaling \$3.3 million, and 5 CD loans totaling \$18.8 million. Lending volumes include loans originated or purchased in the Kansas Non-MSA assessment area, which includes the counties of Barton, Ellis, Ford, Lyon, McPherson, Montgomery, Reno, Saline, and Seward. The bank no longer designates these counties as assessment areas due to the bank's closure or sale of all financial centers or ATMs in those counties. Based on loan volume, examiners weighted small loans to businesses, representing 51 percent of the volume, the most followed by home mortgage loans at 48 percent, and small loans to farms at 1 percent.

The bank originated or purchased too few small loans to farms within the Topeka, KS MSA, Lawrence, KS MSA, and Manhattan, KS MSA during the evaluation period for any meaningful analysis. Therefore, discussion of performance in making small loans to farms is limited to the Wichita, KS MSA.

Examiners conducted telephone interviews with two local community services agencies representing affordable housing and small business lending. The community contacts noted that affordable housing through LIHTCs is a need in the Wichita, KS MSA. The contacts noted that affordable housing is ample in the Topeka, KS MSA. One contact noted the need to fund small businesses with working capital to help with their credit needs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Kansas is rated High Satisfactory based on adequate lending activity, excellent geographic distribution, and good borrower income distribution performance. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Kansas is adequate. Lending activity is good in the Topeka, KS MSA, but adequate in the Wichita, KS MSA. The adequate performance in the Wichita, KS MSA primarily drives the overall adequate performance due to the bank's significant presence in the Wichita, KS MSA relative to its other assessment areas within the state of Kansas.

Topeka, KS MSA

Lending activity in the Topeka, KS MSA is good. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 6.1 percent. The bank ranks third among 36 depository financial institutions in the assessment area, which places it in the top 9 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.5 percent based on the number of home mortgage loans originated or purchased. The bank ranks 15th among 259 home mortgage lenders, which places it in the top 6 percent of lenders. According to peer small business data for 2016, the bank has a 5.4 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks ninth among 60 small business lenders, which places it in the top 15 percent of lenders. The bank originated too few small loans to farms for any meaningful analysis. Considering the bank's higher ranking among all lenders for home mortgage loans relative to its ranking for deposits, overall lending activity is good.

Wichita, KS MSA

Lending activity in the Wichita, KS MSA is adequate. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 24.8 percent. The bank ranks first among 55 depository financial institutions in the assessment area, which places it in the top 2 percent of institutions. Excluding the \$1.1 billion in deposits from outside the assessment area, the bank's deposit market share declines to 18.8 percent, placing it in the top 4 percent of depository financial institutions. According to peer mortgage data for 2016, the bank has a market share of 1.3 percent based on the number of home mortgage loans originated or purchased. The bank ranks 20th among 344 home mortgage lenders, which places it in the top 6 percent of lenders.

During 2016, the bank originated 272 home mortgage loans. Consistent with the bank's responsible growth strategy, it has moved away from buying mortgages from other lenders if the bank does not already have a relationship with the customer. This strategy has significantly reduced the bank's volume of loans in the market when compared with other lenders that rely in whole or in part on loan purchases to increase their loan volume.

According to peer small business data for 2016, the bank has a 6.2 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks seventh among 88 small business lenders, which places it in the top 8 percent of lenders. During 2016, the bank originated 611 small loans to businesses averaging \$26,000. Some of the top lenders in the market make small dollar loans, which is indicative of a small business card lender. For example, American Express tops the market

with 1,180 loans for a market share of 11.9 percent based on the number of loans originated. However, its average loan size is \$11,000. Fourth ranked Capital One Bank originated 783 loans, but its average loan size is \$9,000. Ninth ranked Synchrony Bank's average loan size is only \$2,000. Lenders primarily offering credit cards can often distort market share data based on the number of loans originated or purchased. For small loans to farms, the bank has a market share of 2.7 percent based on the number of small loans to farms originated or purchased. The bank ranks 10th among 20 farm lenders, which places it in the 50th percentile of lenders. Considering the lower ranking for all categories of loans relative to its ranking for deposits, even after adjusting for deposits likely not derived from the Wichita, KS MSA, coupled with the other performance context information discussed, overall lending activity is adequate.

Table 1. Total Lending Volume												2012-2016	
LENDING VOLUME				Geography: KANSAS				Evaluation Period: January 1, 2012 to December 31, 2016					
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)		
Full Review													
Topeka, KS	21.51	1,266	132,536	822	17,012	22	123	0	0	2,110	149,671	7.56	
Wichita, KS	55.88	2,322	278,865	3,098	89,317	58	926	3	11,230	5,481	380,338	89.60	
Limited Review													
Kansas Non-MSA	10.31	442	42,357	531	13,842	38	2,084	0	0	1,011	58,283	0.00	
Lawrence, KS	8.33	478	68,052	327	9,888	12	119	0	0	817	78,059	2.84	
Manhattan, KS	3.98	175	25,154	201	2,461	12	83	2	5,580	390	33,278	0.00	
KANSAS	100.00	4,683	546,964	4,979	132,520	142	3,335	5	16,810	9,809	699,629	100.00	
(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.													
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.													
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.													

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is excellent. The distribution is good in the Topeka, KS MSA and excellent in Wichita, KS MSA.

Topeka, KS MSA

The geographic distribution of home mortgage loans in the Topeka, KS MSA is good. Performance is adequate in low-income geographies and excellent in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 2.1 percent is lower than the 3.9 percent of owner-occupied housing units in low-income

geographies; however, the bank’s distribution exceeds the 1.7 percent for aggregate lenders. The distribution in moderate-income geographies at 12.2 percent is slightly lower than the 14.4 percent of owner-occupied housing units in moderate-income geographies and it exceeds the 11.1 percent for aggregate lenders.

Wichita, KS MSA

The geographic distribution of home mortgage loans in the Wichita, KS MSA is good. Performance is good in low-income geographies and good in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 1.9 percent is slightly lower than the 2.9 percent of owner-occupied housing units in low-income geographies and it exceeds the 1.5 percent performance for aggregate lenders. The distribution in moderate-income geographies at 18.5 percent is slightly lower than the 22.2 percent of owner-occupied housing units in moderate-income geographies and it exceeds the 17.1 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Topeka KS MSA	435	46,763	27.6	6,758	3.9	2.1	1.7	14.4	12.2	11.1	51.7	51.5	50.6	30.0	34.3	36.6	0.0	0.0	0.0
FS Wichita KS MSA	942	115,221	59.7	21,511	2.9	1.9	1.5	22.2	18.5	17.1	39.0	32.7	35.2	35.8	46.9	46.3	0.0	0.0	0.0
LS Lawrence KS MSA	149	22,277	9.4	3,490	2.2	4.7	2.9	16.1	15.4	14.3	51.0	48.3	52.1	30.7	31.5	30.7	0.0	0.0	0.0
LS Manhattan KS MSA	51	7,136	3.2	2,879	0.0	0.0	0.0	9.2	13.7	8.6	65.1	56.9	51.9	25.7	29.4	39.5	0.0	0.0	0.0
Total	1,577	191,397	100.0	34,638	2.9	2.2	1.6	19.0	16.3	14.9	44.8	40.1	41.3	33.3	41.4	42.2	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Topeka, KS MSA and excellent in the Wichita, KS MSA.

Topeka, KS MSA

The geographic distribution of small loans to businesses in the Topeka, KS MSA is excellent. Performance is good in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 12.7 percent is lower than the 14.6 percent of businesses in low-income geographies and it is lower than the 13.6 percent performance for aggregate lenders. The distribution in moderate-income geographies at 15.6 percent exceeds the 12.8 percent of businesses in moderate-income geographies and it is slightly lower than the 16.1 percent performance for aggregate lenders.

Wichita, KS MSA

The geographic distribution of small loans to businesses in the Wichita, KS MSA is excellent. The distribution is good in low-income geographies and excellent in moderate-income geographies. The geographic distribution in low-income geographies at 9.2 percent is slightly lower than the 9.6 percent of businesses in low-income geographies and it is lower than the 11 percent performance for aggregate lenders. The geographic distribution in moderate-income geographies at 21.6 percent is slightly higher than the 20.9 percent of businesses in moderate-income geographies and it is comparable with the 21.7 percent performance of aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Topeka KS MSA	474	8,559	18.0	2,477	14.6	12.7	13.6	12.8	15.6	16.1	49.8	44.5	48.1	22.8	27.2	22.2	0.0	0.0	0.0
FS Wichita KS MSA	1,841	47,981	69.8	9,838	9.6	9.2	11.0	20.9	21.6	21.7	36.6	28.7	30.2	32.9	40.6	37.1	0.0	0.0	0.0
LS Lawrence KS MSA	212	6,223	8.0	1,860	7.0	6.1	3.3	23.6	22.2	24.1	42.9	48.1	44.4	26.5	23.6	28.2	0.0	0.0	0.0
LS Manhattan KS MSA	110	1,880	4.2	1,173	0.0	0.0	0.0	20.7	17.3	21.3	55.7	69.1	45.2	23.5	13.6	33.5	0.1	0.0	0.0
Total	2,637	64,643	100.0	15,348	9.7	9.2	9.7	19.3	20.4	21.0	41.8	34.8	35.9	29.2	35.7	33.3	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is good, driven by performance in the Wichita, KS MSA.

Topeka, KS MSA

The bank made too few small loans to farms in the Topeka, KS MSA to perform any meaningful analysis.

Wichita, KS MSA

The geographic distribution of small loans to farms in the Wichita, KS MSA is good, based on adequate performance in low-income geographies and excellent performance in moderate-income geographies. The bank did not originate or purchase any loans in low-income geographies where only 1.3 percent of farms are located. Given the low demand for loans due to the low presence of farms in low-income geographies, performance is adequate. The geographic distribution in moderate-income geographies at 9.1 percent exceeded the 6.7 percent of farms in moderate-income geographies and it significantly exceeds the 1.4 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms			Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Topeka KS MSA	10	59	17.9	101	0.7	0.0	0.0	2.8	0.0	0.0	71.8	40.0	80.2	24.7	60.0	19.8	0.0	0.0	0.0
FS Wichita KS MSA	33	570	58.9	486	1.3	0.0	0.2	6.7	9.1	1.4	62.2	63.6	76.7	29.8	33.3	21.6	0.0	0.0	0.0
LS Lawrence KS MSA	4	44	9.5	30	2.0	0.0	0.0	10.3	50.0	6.7	45.1	50.0	36.7	42.6	66.7	56.7	0.0	0.0	0.0
LS Manhattan KS MSA	8	68	14.3	55	0.0	0.0	0.0	2.1	0.0	0.0	78.4	100.0	80.0	19.5	0.0	20.0	0.0	0.0	0.0
Total	56	744	100.0	672	1.1	0.0	0.1	5.3	7.1	1.3	65.5	60.7	75.7	28.1	33.9	22.8	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is excellent. The distribution is excellent in the Topeka, KS MSA and excellent in the Wichita, KS MSA.

Topeka, KS MSA

The distribution of home mortgage loans by borrower income in the Topeka, KS MSA is excellent. The distribution is good to low-income borrowers and excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 12.9 percent is lower than the 20.8 percent of low-income families in the MSA; however, the bank’s performance significantly exceeds the 6.4 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 26 percent exceeds the 17.3 percent of moderate-income families and it exceeds the 19.1 percent performance for aggregate lenders.

Wichita, KS MSA

The distribution of home mortgage loans by borrower income in the Wichita, KS MSA is excellent. The distribution is good to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 12.7 percent is lower than the 20.2 percent of low-income families in the MSA; however, it is significantly higher than the 6.9 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 21.2 percent exceeds the 18.5 percent of moderate-income families in the MSA and it exceeds the 16.7 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Topeka KS MSA	435	46,763	27.6	6,758	20.8	12.9	6.4	17.3	26.0	19.1	23.2	21.6	21.8	38.6	28.3	36.1	0.0	11.3	16.6
FS Wichita KS MSA	942	115,221	59.7	21,511	20.2	12.7	6.9	18.5	21.2	16.7	21.2	22.6	20.9	40.1	33.7	33.0	0.0	9.8	22.4
LS Lawrence KS MSA	149	22,277	9.4	3,490	21.6	12.1	7.9	16.2	19.5	19.0	21.9	20.8	21.0	40.3	38.9	39.3	0.0	8.7	12.8
LS Manhattan KS MSA	51	7,136	7.1	2,879	18.9	3.9	4.1	19.3	19.6	13.3	22.6	23.5	22.0	39.3	43.1	41.0	0.0	9.8	19.6
Total	1,577	191,397	100.0	34,638	20.4	12.4	6.7	18.1	22.3	17.1	21.9	22.2	21.2	39.7	33.0	34.9	0.0	10.1	20.1

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Topeka, KS MSA and good in the Wichita, KS MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 36 percent of its small loans to businesses.

Topeka, KS MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Topeka, KS MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 56.3 percent is lower than the 74.5 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 37.6 percent for aggregate lenders, overall performance is good.

Wichita, KS MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Wichita, KS MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 53.6 percent is lower than the 75 percent of businesses

with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 36.9 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Topeka KS MSA	474	8,559	18.0	2,477	74.5	56.3	37.6	5.8	11.0	19.7	32.7
FS Wichita KS MSA	1,841	47,981	69.8	9,838	75.0	53.6	36.9	6.4	10.6	18.5	35.7
LS Lawrence KS MSA	212	6,223	8.0	1,860	77.3	55.2	45.5	5.2	9.0	17.5	35.8
LS Manhattan KS MSA	110	1,880	4.2	1,173	73.9	46.4	41.9	5.9	10.9	20.2	42.7
Total	2,637	64,643	100.0	15,348	75.1	53.9	38.5	6.1	10.6	18.8	35.5

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is poor, driven by poor performance in the Wichita, KS MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 48 percent of its small loans to farms.

Topeka, KS MSA

The bank made too few small loans to farms in the Topeka, KS MSA to perform any meaningful analysis.

Wichita, KS MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Wichita, KS MSA is poor. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 48.5 percent is lower than the 98.2 percent of farms with gross annual revenues of \$1 million or less. The bank’s distribution is also lower than the 54.7 percent for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Topeka KS MSA	10	59	17.9	101	99.2	50.0	28.7	0.4	0.0	0.3	50.0
FS Wichita KS MSA	33	570	58.9	486	98.2	48.5	54.7	1.2	18.2	0.6	45.5
LS Lawrence KS MSA	5	47	9.5	30	96.8	60.0	33.3	2.2	0.0	1.0	50.0
LS Manhattan KS MSA	8	68	16.7	55	95.9	28.6	38.2	1.9	100.0	2.3	71.4
Total	56	744	100.0	672	98.1	46.4	48.5	1.1	9.1	0.7	48.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect overall on the bank's Lending Test performance in the state of Kansas. The bank met the communities' credit needs primarily through retail lending.

Topeka, KS MSA

In the Topeka, KS MSA, CD lending has a negative effect on the lending performance in the assessment area. The bank did not originate or purchase any CD loans in the Topeka, KS MSA during the evaluation period.

Wichita, KS MSA

In the Wichita, KS MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated three CD loans totaling \$11.2 million that primarily helped provide more than 100 units of affordable housing. CD lending represents 3.5 percent of the allocated Tier 1 Capital, after considering \$1.1 billion in deposits from national corporations in which the deposits did not derive from the local community.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Kansas, lending under the MHA and HARP programs accounted for 74 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Lawrence, KS MSA is consistent with the High Satisfactory Lending Test performance in the state of Kansas. Performance in the Manhattan, KS MSA is stronger than the overall High Satisfactory Lending Test performance in the state of Kansas primarily due to higher relative levels of CD lending that has a significantly positive effect on the lending performance in the assessment area.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Kansas is rated Outstanding. Investment performance is poor in the Topeka, KS MSA and excellent in the Wichita, KS MSA. Investment Test performance in the Wichita, KS MSA carried approximately 90 percent of the weight in arriving at the state rating. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Topeka, KS MSA

In the Topeka, KS MSA, Bank of America has a poor level of CD investments. The bank made 23 CD investments during the current evaluation period totaling \$1.3 million. Approximately \$1.3 million or 96 percent of the current period investment dollars supported 11 units of affordable housing. In addition, the bank has 13 CD investments totaling \$403,000 it made during a prior evaluation period that are still outstanding and continuing to provide benefit to the community. Prior period and current period investments total \$1.7 million or 4.4 percent of allocated Tier 1 Capital. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$1.3 million or 96 percent of the investment dollars.

Wichita, KS MSA

In the Wichita, KS MSA, the bank has an excellent level of CD investments. The bank made 143 CD investments during the current evaluation period totaling \$48.5 million. Approximately \$48 million or 99 percent of the current period investment dollars supported 113 units of affordable housing. In addition, the bank has 60 CD investments totaling \$5.4 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$53.9 million or 16.6 percent of allocated Tier 1 Capital, after considering the \$1.1 billion in deposits that did not originate from the assessment area. The bank invested approximately 76 percent of the investment dollars in Mortgage Backed Securities. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$36.6 million or 75 percent of the investment dollars.

Examples of community development investments include:

- The bank provided \$11.4 million in funding for the construction of two phases of Broadstone Villas, a mixed-income multifamily LIHTC development in Bel Aire, KS. Phase 1 comprises 48 units with all units restricted to incomes at or below 60 percent of the area median income. Phase 2 comprises 60 units with 54 units restricted to incomes at or below 60 percent of the area median income and 6 units unrestricted at market rates.

Table 14. Qualified Investments								2012-2016	
QUALIFIED INVESTMENTS		Geography: KANSAS			Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Topeka, KS	13	403	23	1,327	36	1,730	2.56	0	0
Wichita, KS	60	5,373	143	48,518	203	53,891	79.70	1	82
Limited Review									
Lawrence, KS	2	42	17	456	19	498	0.74	0	0
Manhattan, KS	2	993	8	5,497	10	6,490	9.60	1	1,749
KANSAS - Statewide	0	0	10	62	10	62	0.09	0	0
KANSAS - Non Assessed	34	2,839	48	2,110	82	4,949	7.32	0	0
KANSAS	111	9,650	249	57,970	360	67,620	100.00	2	1,832

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Manhattan, KS MSA is consistent with the Outstanding Investment Test performance in the state of Kansas. Investment Test performance in the Lawrence, KS MSA is weaker than the overall Outstanding Investment Test performance in the state of Kansas due to a lower level of CD investments relative to the bank's size and capacity in the assessment area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Kansas is rated Outstanding. Service Test performance is excellent in the Topeka, KS MSA and excellent in the Wichita, KS MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Topeka, KS MSA

In the Topeka, KS MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's four financial centers with the distribution of the population. The bank has one financial center in low-income geographies or 25 percent of its financial centers where 8.1 percent of the population lives. The bank also has one financial

center representing 25 percent of its financial centers located in moderate-income geographies where 17.3 percent of the population lives.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies.

The bank has one financial center in a middle- or upper-income census tract that is adjacent to or in very close proximity to a moderate-income census tract. The adjacent financial center helps improve access to retail banking services to individuals in moderate-income geographies.

Financial center openings and closings generally did not affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank closed two financial centers during the evaluation period: one in a low-income geography and one in a moderate-income geography. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Financial centers are generally open 9:00 am to 5:00 pm Monday through Friday and 9:00 am to 12:00 pm on Saturday. The operating hours for the financial center located in a low-income geography are more restrictive. The financial center is only open 9:00 am to 4:00 pm Monday through Friday. Saturday banking is not available.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Topeka KS MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	6	10.5	18,981	8.1	1	25.0	2	25.0	0	0.0	1	50.0
Moderate	11	19.3	40,522	17.3	1	25.0	2	25.0	0	0.0	1	50.0
Middle	28	49.1	113,754	48.6	1	25.0	3	37.5	0	0.0	0	0.0
Upper	12	21.1	60,613	25.9	1	25.0	1	12.5	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	57	100.0	233,870	100.0	4	100.0	8	100.0	0	100.0	2	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Wichita, KS MSA

In the Wichita, KS MSA, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 12 financial centers with the distribution of the population. The bank has two financial centers representing 16.7 percent of its financial centers in low-income geographies where 5.9 percent of the population lives. The bank has three financial centers representing 25 percent of its financial centers located in moderate-income geographies where 26.5 percent of the population lives.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The proportions of customers in low- and moderate-income geographies using telephone, text banking, and full-service ATMs exceed the proportion of the population in low- and moderate-income geographies.

The bank has two financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to moderate-income census tracts. These financial centers provide additional access to retail banking services in moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center and closed five. The bank closed one financial center in a low-income geography, three in moderate-income geographies, and one in a middle-income geography. Despite these closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconvenience the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Financial centers are generally open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 12:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Wichita KS MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	12	7.9	36,954	5.9	2	16.7	3	12.5	1	100.0	1	20.0
Moderate	46	30.3	166,945	26.5	3	25.0	7	29.2	0	0.0	3	60.0
Middle	52	34.2	231,873	36.8	3	25.0	7	29.2	0	0.0	1	20.0
Upper	42	27.6	195,147	30.9	4	33.3	7	29.2	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	152	100.0	630,919	100.0	12	100.0	24	100.0	1	100.0	5	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Topeka, KS MSA

The bank provides a relatively low level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 14 community development services targeted to low- and moderate-income individuals. Employees provided four financial education workshops for 76 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 10 webinars and workshops with non-profit organizations to help the organizations with capacity building. No employees served on

the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Wichita, KS MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 37 community development services targeted to low- and moderate-income individuals. Employees provided two financial education workshops for 48 students from low- and moderate-income families. Employees participated in nine webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 26 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Lawrence, KS MSA is consistent with the Outstanding Service Test performance in the state of Kansas. Performance in the Manhattan, KS MSA is weaker than the overall Outstanding Service Test performance in the state of Kansas primarily because of having no financial centers to provide retail-banking services in the MSA.

State of Maine

CRA Rating for Maine²⁷:	Outstanding
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>Outstanding</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Maine

The state of Maine is Bank of America's 34th largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$1.8 billion or 0.2 percent of its total domestic deposits in financial centers within the state of Maine. Of the 31 depository financial institutions operating in the state, Bank of America, with a deposit market share of 6.7 percent, is the fifth largest. The bank's primary banking competitors for deposits in Maine with deposit shares greater than 5 percent include TD Bank (12.9 percent), KeyBank (12.5 percent), The Camden National Bank (10.4 percent), and Bangor Savings Bank (9.2 percent). As of December 31, 2016, the bank operated 17 financial centers and 37 full-service ATMs in Maine.

Refer to the market profiles for the state of Maine in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Maine

The bank has defined two assessment areas in the state of Maine that include the Portland-South Portland, ME MSA and Maine Non-MSA. Examiners selected the Portland-South Portland, ME MSA for a full-scope review. This assessment area comprises 100 percent of the

²⁷ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

bank's deposits and 94 percent of the bank's lending in the state of Maine. Examiners performed a limited-scope review on the Maine Non-MSA assessment area.

During the evaluation period, Bank of America originated or purchased 3,545 home mortgage loans totaling \$764.2 million, 5,501 small loans to businesses totaling \$180.3 million, 84 small loans to farms totaling \$848,000, and one CD loan totaling \$1.2 million. Lending volumes include loans originated or purchased in the Bangor, ME MSA, which the bank no longer designates as an assessment area due to the bank's closure or sale of all financial centers and deposit-taking ATMs. Based on loan volume, examiners weighted small loans to businesses, representing 60 percent of the volume, the most followed by home mortgage loans at 39 percent, and small loans to farms at 1 percent.

Examiners conducted a telephone interview with one local economic development organization. According to the community contact, affordable housing remains the area's biggest need.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Maine

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Maine is rated High Satisfactory, based on excellent lending activity, good geographic distribution, and good borrower income distribution. Performance in the limited-scope assessment area has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Maine is excellent. Lending activity is excellent in the Portland-South Portland, ME MSA.

Portland-South Portland, ME MSA

Lending activity in the Portland-South Portland, ME MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 14 percent. The bank ranks third among 21 depository financial institutions, which places it in the top 15 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.9 percent based on the number of home mortgage loans originated or purchased. The bank ranks 12th among 367 home mortgage lenders in the assessment area, which places it in the top 4 percent of lenders. According to peer small business data for 2016, the bank has an 8.9 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks third among 88 small business lenders, which places it in the top 4 percent of lenders. For small loans to farms, the bank has a market share of 17.3 percent based on the number of small loans to farms originated or purchased. The bank ranks first among 19 farm lenders, which places it in the top 6 percent of lenders.

Considering the bank’s higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

Table 1. Total Lending Volume											2012-2016	
LENDING VOLUME		Geography: MAINE						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Portland, ME	87.72	3,055	688,448	4,886	159,542	68	722	1	1,196	8,010	849,908	100.00
Limited Review												
Bangor, ME	4.90	198	26,733	244	13,765	5	34	0	0	447	40,532	0.00
Maine Non-MSA	7.38	292	49,005	371	7,016	11	92	0	0	674	56,113	0.00
MAINE	100.00	3,545	764,186	5,501	180,323	84	848	1	1,196	9,131	946,553	100.00
(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.												
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.												
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.												

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is good in the Portland-South Portland, ME MSA.

Portland-South Portland, ME MSA

The geographic distribution of home mortgage loans in the Portland-South Portland, ME MSA is good. Performance is excellent in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 0.7 percent exceeds the 0.3 percent of owner-occupied housing units in low-income geographies and it is consistent with the 0.7 percent for aggregate lenders. The distribution in moderate-income geographies at 7.8 percent is lower than the 10.4 percent of owner-occupied housing units in moderate-income geographies and lower than the 9.9 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Portland-South Portland ME MSA	1,238	304,830	96.6	22,503	0.3	0.7	0.7	10.4	7.8	9.9	63.2	61.0	62.7	26.1	30.5	26.6	0.0	0.0	0.0
LS Maine Non-MSA	44	6,393	3.4	969	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	1,282	311,223	100.0	23,472	0.3	0.7	0.7	9.6	7.5	9.5	66.0	62.3	64.3	24.1	29.5	25.5	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The distribution is good in the Portland-South Portland, ME MSA.

Portland-South Portland, ME MSA

The geographic distribution of small loans to businesses in the Portland-South Portland, ME MSA is good. Performance is good in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 6.8 percent is lower than the 7.4 percent of businesses in low-income geographies and lower than the 7.1 percent performance for aggregate lenders. The distribution in moderate-income geographies at 9.2 percent is slightly lower than the 9.8 percent of businesses in moderate-income geographies and slightly lower than the 9.4 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Portland-South Portland ME MSA	3,193	98,629	97.1	12,371	7.4	6.8	7.1	9.8	9.2	9.4	59.7	56.8	58.1	23.1	27.2	25.4	0.0	0.0	0.0
LS Maine Non-MSA	96	833	2.9	778	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	3,193	98,629	97.1	12,371	7.4	6.8	7.1	9.8	9.2	9.4	59.7	56.8	58.1	23.1	27.2	25.4	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is good. Performance is good in the Portland-South Portland, ME MSA.

Portland-South Portland, ME MSA

The geographic distribution of small loans to farms in the Portland-South Portland, ME MSA is good, based on excellent performance in low-income geographies and adequate performance in moderate-income geographies. The geographic distribution of small loans to farms in low-income geographies at 5.9 percent exceeds the 2.4 percent of farms in low-income geographies and it exceeds the 3.4 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 5.9 percent is lower than the 6.7 percent of farms in moderate-income geographies and it is lower than the 7.7 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS Portland-South Portland ME MSA	48	510	90.6	117	2.4	5.9	3.4	6.7	5.9	7.7	68.5	66.7	71.8	22.5	29.2	17.1	0.0	0.0	0.0
LS Maine Non-MSA	5	35	13.2	31	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	48	510	90.6	117	2.4	5.9	3.4	6.7	5.9	7.7	68.5	66.7	71.8	22.5	29.2	17.1	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Portland-South Portland, ME MSA.

Portland-South Portland, ME MSA

The distribution of home mortgage loans by borrower income in the Portland-South Portland, ME MSA is good. The distribution is adequate to low-income borrowers and good to moderate-

income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 7.7 percent is lower than the 19 percent of low-income families in the MSA; however, the bank’s performance exceeds the 5.2 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 15 percent is lower than the 18.3 percent of moderate-income families and it is slightly lower than the 16.5 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Portland-South Portland ME MSA	1,238	304,830	96.6	22,503	19.0	7.7	5.2	18.3	15.0	16.5	23.6	19.8	22.5	39.2	51.8	40.2	0.0	5.7	15.6
LS Maine Non-MSA	44	6,393	10.0	969	20.8	2.3	5.5	18.5	9.1	15.7	22.4	25.0	21.7	38.3	38.6	39.5	0.0	25.0	17.6
Total	1,282	311,223	100.0	23,472	19.1	7.5	5.2	18.3	14.8	16.5	23.5	20.0	22.5	39.1	51.3	40.2	0.0	6.4	15.7

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Portland-South Portland, ME MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 38 percent of its small loans to businesses.

Portland-South Portland, ME MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Portland-South Portland, ME MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 48 percent is lower than the 77.5 percent of businesses with gross annual revenues of \$1 million or less. However, the bank exceeds the 47 percent for aggregate lenders.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Portland-South Portland ME MSA	3,193	98,629	97.1	12,371	77.5	48.0	47.0	6.1	13.5	16.3	38.4
LS Maine Non-MSA	96	833	2.9	778	80.4	46.9	57.2	3.9	8.3	15.7	44.8
Total	3,193	98,629	97.1	12,371	77.5	48.0	47.0	6.1	13.5	16.3	38.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is poor, driven by performance in the Portland-South Portland, ME MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 44 percent of its small loans to farms.

Portland-South Portland, ME MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Portland-South Portland, ME MSA is poor. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 54.2 percent is lower than the 96.5 percent of farms with gross annual revenues of \$1 million or less. The bank’s distribution is also lower than the 68.4 percent for aggregate lenders.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Portland-South Portland ME MSA	48	510	100.0	117	96.5	54.2	68.4	2.4	6.7	1.1	43.8
LS Maine Non-MSA	5	35	15.0	31	99.4	100.0	83.9	0.6	0.0	0.0	100.0
Total	48	510	100.0	117	96.5	54.2	68.4	2.4	6.7	1.1	43.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect overall on the bank’s Lending Test performance in the state of Maine. The bank met the community’s credit needs primarily through retail lending.

Portland-South Portland, ME MSA

In the Portland-South Portland, ME MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated one CD loan for \$1.2 million for affordable housing purposes. CD lending represents 0.5 percent of the allocated Tier 1 Capital.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Maine, lending under the MHA and HARP programs accounted for 87 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Maine Non-MSA is weaker than the overall High Satisfactory Lending Test performance in the state of Maine primarily due to weaker borrower income distributions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Maine is rated Outstanding. Investment performance is excellent in the Portland-South Portland, ME MSA. Performance in the limited-scope assessment area has a neutral effect on the state rating.

Portland-South Portland, ME MSA

In the Portland-South Portland, ME MSA, Bank of America has an excellent level of community development investments. The bank made 56 CD investments during the current evaluation period totaling \$19.1 million. Approximately \$19 million or 99 percent of the investment dollars supported 792 units of affordable housing. In addition, the bank has 57 CD investments totaling \$8.8 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$27.9 million or 12.4 percent of allocated Tier 1 Capital. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$13.7 million or 72 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$282,000 in a fund that acquires direct and indirect investments in partnerships that own affordable housing projects throughout the United States. This amount represents 28 units of the Applegate Village Apartments affordable housing project within the Portland-South Portland, ME MSA.
- The bank invested \$465,000 in a fund that acquires direct and indirect investments in partnerships that own affordable housing projects throughout the United States. This amount represents 160 units of the Congress Square housing development within the Portland-South Portland, ME MSA.
- The bank invested \$878,000 in a LIHTC to finance the construction of Osprey Circle, a 48-unit affordable housing development in South Portland, ME. All units are restricted to tenants aged 55 or older and incomes at or below 60 percent of the area median income.

QUALIFIED INVESTMENTS		Geography: MAINE				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Portland, ME	57	8,782	56	19,142	113	27,925	80.99	6	409
Limited Review									
Maine Non-MSA	1	90	8	643	9	733	2.12	0	0
MAINE - Statewide	0	0	17	276	17	276	0.80	0	0
MAINE - Non Assessed	16	1,416	31	4,130	47	5,546	16.09	2	269
MAINE	74	10,289	112	24,191	186	34,479	100.00	8	678

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Maine Non-MSA is consistent with the Outstanding Investment Test performance in the state of Maine.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Maine is rated Outstanding. Service Test performance is excellent in the Portland-South Portland, ME MSA. Performance in the limited-scope assessment area has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Portland-South Portland, ME MSA

In the Portland-South Portland, ME MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 16 financial centers with the distribution of the population. The bank has two financial centers in low-income geographies or 12.5 percent of its financial centers where only 1.6 percent of the population lives. The bank also has two financial centers or 12.5 percent of its financial centers located in moderate-income geographies where 12.9 percent of the population lives.

Examiners also considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. The proportions of customers in low- and moderate-income

geographies using alternative delivery systems are near to or exceed the percentage of the population residing in low- and moderate-income geographies.

Financial center openings and closings generally did not affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center in a low-income geography and closed five. The bank closed one financial center in a low-income geography, two in moderate-income geographies, and two in middle-income geographies. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are generally consistent throughout the assessment area. Financial centers are open 9:00 am to 4:00 pm Monday through Friday and 9:00 am to 12:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Portland-South Portland ME MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	3	2.6	8,434	1.6	2	12.5	3	8.3	1	100.0	1	20.0
Moderate	18	15.7	66,070	12.9	2	12.5	4	11.1	0	0.0	2	40.0
Middle	69	60.0	318,460	61.9	8	50.0	22	61.1	0	0.0	2	40.0
Upper	24	20.9	121,134	23.6	4	25.0	7	19.4	0	0.0	0	0.0
NA	1	0.9	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	115	100.0	514,098	100.0	16	100.0	36	100.0	1	100.0	5	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Portland-South Portland, ME MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 31 community development services targeted to low- and moderate-income individuals. Employees participated in 18 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 13 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Maine Non-MSA is weaker than the overall Outstanding Service Test performance in the state of Maine. Performance is weaker primarily due to the limited banking presence in the assessment area.

State of Maryland

CRA Rating for Maryland²⁸:	Outstanding
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>Outstanding</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively high level of CD lending that has a positive effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Maryland

The state of Maryland is Bank of America's 13th largest rating area based on its total deposits in the state when excluding deposits in the Salisbury, MD-DE and Washington-Arlington-Alexandria, DC-VA-MD Multistate MSAs. Examiners excluded the Salisbury, MD-DE and Washington-Arlington-Alexandria, DC-VA-MD Multistate MSAs from the analysis of the state of Maryland because the examiners evaluated the multistate MSAs as separate rating areas. As of June 30, 2016, the bank maintained approximately \$19.4 billion or 1.6 percent of its total domestic deposits in financial centers in areas of the state of Maryland that do not include the multistate MSAs. Of the 75 depository financial institutions operating in the state, Bank of America, with a deposit market share of 24.8 percent, is the largest. The bank's primary banking competitors for deposits in Maryland with deposit shares greater than 5 percent include Manufacturers and Traders Trust Company (20.9 percent), PNC Bank (11.4 percent), Branch Banking and Trust Company (9 percent), and Wells Fargo Bank (8.9 percent). As of December 31, 2016, the bank operated 86 financial centers and 277 full-service ATMs in Maryland.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In

²⁸ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

the Baltimore-Columbia-Towson, MD MSA, Bank of America reported an additional \$791.6 million in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

Refer to the community profiles for the state of Maryland in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Maryland

The bank has defined three assessment areas in the state of Maryland. Examiners selected the Baltimore-Columbia-Towson, MD MSA for a full-scope review. The Baltimore-Columbia-Towson, MD MSA accounts for approximately 98 percent of the bank's deposits in the state. During the evaluation period, Bank of America originated or purchased 18,239 home mortgage loans totaling \$4.5 billion, 29,816 small loans to businesses totaling \$844.9 million, 191 small loans to farms totaling \$2 million, and 34 CD loans totaling \$223.9 million. Loan volumes include loans that originated or purchased in the Salisbury, MD MSA prior to the MSA's designation as a multistate MSA in 2014. Based on loan volume, examiners weighted small loans to businesses, representing nearly 62 percent of the volume, the most followed by home mortgage loans at 38 percent, and small loans to farms at less than 1 percent.

Examiners conducted one community contact with a local community development organization. Community needs identified include public safety and quality of life, housing creation and blighted housing removal, education, retail and commercial development, and workforce development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MARYLAND

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Maryland is rated Outstanding, based on excellent lending activity, good geographic distribution, good borrower income distribution, and relatively high levels of CD lending that have a positive effect on overall lending performance. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Maryland is excellent. Lending activity is excellent in the Baltimore-Columbia-Towson, MD MSA.

Baltimore-Columbia-Towson, MD MSA

Lending activity in the Baltimore-Columbia-Towson, MD MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 27.1 percent. The bank ranks first among 53 depository financial institutions in the assessment area, placing it in the top 2 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.8 percent based on the number of home mortgage loans originated or purchased. The bank ranks 11th among 608 home mortgage lenders, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has a 10.2 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks third among 152 small business lenders, which places it in the top 2 percent of lenders. For small loans to farms, the bank has a market share of 9.2 percent based on the number of small loans to farms originated or purchased. The bank ranks second among 20 farm lenders, which places it in the top 10 percent of lenders. Considering the bank's ranking among all lenders for home mortgage loans and small loans to businesses is consistent with its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: MARYLAND						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Baltimore, MD	93.03	16,598	4,092,549	28,133	796,563	149	1,574	33	222,393	44,913	5,113,079	97.78
Limited Review												
California, MD	1.36	234	49,556	418	7,992	4	27	0	0	656	57,575	1.10
Maryland Non-MSA	4.59	1,164	318,205	1,030	34,259	23	348	1	1,462	2,218	354,274	1.12
Salisbury, MD	1.02	243	36,662	235	6,073	15	95	0	0	493	42,830	0.00
MARYLAND	100.00	18,239	4,496,972	29,816	844,887	191	2,044	34	223,855	48,280	5,567,758	100.00
(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.												
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.												
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.												

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is good in the Baltimore-Columbia-Towson, MD MSA.

Baltimore-Columbia-Towson, MD MSA

The geographic distribution of home mortgage loans in the Baltimore-Columbia-Towson, MD MSA is good. Performance is good in low-income geographies and good in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 4.7 percent is lower than the 5.6 percent of owner-occupied housing units in low-income geographies, but is higher than the 3.3 percent for aggregate lenders. The distribution in moderate-income geographies at 15.3 percent is lower than the 16.6 percent of owner-occupied housing units in moderate-income geographies, but is higher than the 13.1 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Baltimore-Columbia-Towson MD MSA	6,298	1,602,213	93.8	106,382	5.6	4.7	3.3	16.6	15.3	13.1	39.0	37.9	40.0	38.8	42.0	43.5	0.0	0.0	0.0
LS California-Lexington Park MD MSA	234	49,556	3.5	4,792	3.1	3.0	2.9	4.4	8.5	4.2	77.5	75.2	71.5	15.0	13.2	21.4	0.0	0.0	0.0
LS Maryland Non-MSA	181	70,495	2.7	2,028	2.4	0.6	1.0	10.4	3.3	8.8	57.6	56.9	56.3	29.6	39.2	34.0	0.0	0.0	0.0
Total	6,713	1,722,264	100.0	113,202	5.5	4.6	3.3	16.0	14.8	12.7	40.9	39.7	41.6	37.7	40.9	42.4	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The distribution is good in the Baltimore-Columbia-Towson, MD MSA.

Baltimore-Columbia-Towson, MD MSA

The geographic distribution of small loans to businesses in the Baltimore-Columbia-Towson, MD MSA is good. Performance is good in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 5.7 percent is lower than the 6.9 percent of businesses in low-income geographies, but it exceeds the 5.3 percent performance for aggregate lenders. The distribution in moderate-income geographies at 12.9

percent is lower than the 14 percent of businesses in moderate-income geographies, but it exceeds the 11.8 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Baltimore-Columbia-Towson MD MSA	17,768	476,062	95.8	58,798	6.9	5.7	5.3	14.0	12.9	11.8	37.6	37.2	36.9	41.2	44.1	45.7	0.2	0.2	0.2
LS Maryland Non-MSA	357	11,211	1.9	1,406	2.7	2.5	1.7	5.6	4.2	5.7	60.7	59.1	57.1	31.0	34.2	35.5	0.0	0.0	0.0
LS California-Lexington Park MD MSA	418	7,992	2.3	1,361	5.7	7.9	5.4	7.0	2.4	4.7	72.4	72.2	73.9	14.8	17.5	16.0	0.0	0.0	0.0
Total	18,543	495,265	100.0	61,565	6.8	5.6	5.2	13.6	12.5	11.5	39.2	38.4	38.2	40.2	43.3	44.8	0.2	0.2	0.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is good. Performance is good in the Baltimore-Columbia-Towson, MD MSA.

Baltimore-Columbia-Towson, MD MSA

The geographic distribution of small loans to farms in the Baltimore-Columbia-Towson, MD MSA is good, based on excellent performance in low-income geographies and poor performance in moderate-income geographies. The geographic distribution of small loans to farms in low-income geographies at 2.4 percent is higher than the 1.9 percent of farms in low-income geographies and it exceeds the 0.4 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 3 percent is lower than the 7.1 percent of farms in moderate-income geographies and it is lower than the 4.2 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Baltimore-Columbia-Towson MD MSA	99	1,214	87.2	260	1.9	2.4	0.4	7.1	3.0	4.2	41.2	36.4	47.7	49.9	59.6	47.7	0.0	0.0	0.0
LS Maryland Non-MSA	16	283	15.3	72	0.4	0.0	0.0	11.4	18.2	12.5	57.7	37.5	61.1	30.4	50.0	26.4	0.0	0.0	0.0
LS California-Lexington Park MD MSA	4	27	3.4	20	1.3	0.0	0.0	0.8	0.0	10.0	80.5	100.0	60.0	17.3	0.0	30.0	0.0	0.0	0.0
Total	119	1,524	100.0	352	1.7	2.1	0.3	7.2	4.2	6.3	44.1	38.7	51.1	46.9	56.3	42.3	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is excellent. The distribution is excellent in the Baltimore-Columbia-Towson, MD MSA.

Baltimore-Columbia-Towson, MD MSA

The distribution of home mortgage loans by borrower income in the Baltimore-Columbia-Towson, MD MSA is excellent. The distribution is good to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 11.1 percent is lower than the 21.4 percent of low-income families in the MSA; however, the bank’s performance significantly exceeds the 6.1 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 16.8 percent is slightly below the 17.3 percent of moderate-income families and it exceeds the 15.6 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate
FS Baltimore-Columbia-Towson MD MSA	6,298	1,602,213	93.8	106,382	21.4	11.1	6.1	17.3	16.8	15.6	21.0	19.3	18.7	40.3	38.4	34.2	0.0	14.4	25.4
LS California-Lexington Park MD MSA	234	49,556	3.5	4,792	19.6	10.3	5.8	17.6	21.8	16.1	23.9	25.6	20.6	38.9	26.5	27.0	0.0	15.8	30.5
LS Maryland Non-MSA	181	70,495	2.7	2,028	19.1	7.7	5.6	17.4	9.4	12.6	21.3	16.6	16.5	42.3	55.2	40.7	0.0	11.1	24.6
Total	6,713	1,722,264	100.0	113,202	21.3	11.0	6.0	17.3	16.7	15.5	21.1	19.5	18.8	40.3	38.5	34.0	0.0	14.3	25.6

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Baltimore-Columbia-Towson, MD MSA. The bank did not collect or consider the gross annual revenues in the underwriting of nearly 31 percent of its small loans to businesses.

Baltimore-Columbia-Towson, MD MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Baltimore-Columbia-Towson, MD MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 58.2 percent is lower than the 77.3 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 47.8 percent for aggregate lenders, overall performance is good.

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
FS Baltimore-Columbia-Towson MD MSA	17,768	476,062	95.8	58,798	77.3	58.2	47.8	5.6	11.3	17.1	30.5
LS Maryland Non-MSA	357	11,211	1.9	1,406	76.8	48.2	47.4	5.4	14.0	17.8	37.8
LS California-Lexington Park MD MSA	418	7,992	2.3	1,361	76.1	57.9	49.9	4.6	8.6	19.3	33.5
Total	18,543	495,265	100.0	61,565	77.2	58.0	47.9	5.6	11.3	17.2	30.7

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good. Performance is good in the Baltimore-Columbia-Towson, MD MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 30 percent of its small loans to farms.

Baltimore-Columbia-Towson, MD MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Baltimore-Columbia-Towson, MD MSA is good. Based on farms with known revenues, the proportion of the bank's small loans to farms at 61.6 percent is lower than the 95 percent of farms with gross annual revenues of \$1 million or less. Considering the bank's distribution exceeds the 27.3 percent for aggregate lenders, overall performance is good.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Baltimore-Columbia-Towson MD MSA	99	1,214	83.2	260	95.0	61.6	27.3	3.2	6.1	1.8	32.3
LS Maryland Non-MSA	16	283	15.3	72	97.4	81.3	40.3	1.2	0.0	1.4	27.3
LS California-Lexington Park MD MSA	4	27	6.5	20	96.8	75.0	50.0	1.5	0.0	1.7	50.0
Total	119	1,524	100.0	352	95.3	64.7	31.3	2.9	5.0	1.8	30.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a positive effect overall on the bank’s Lending Test performance in the state of Maryland.

Baltimore-Columbia-Towson, MD MSA

In the Baltimore-Columbia-Towson, MD MSA, CD lending has a positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated 33 CD loans totaling \$222.4 million that primarily helped provide 1,429 units of affordable housing. CD lending represents 9.7 percent of the allocated Tier 1 Capital.

Examples of CD loans include:

- The bank provided \$5.7 million in financing to rehabilitate Benet House, a 101-unit housing development in southwest Baltimore, MD for seniors aged 62 and older and individuals with disabilities. All units are restricted to incomes at or below 50 percent of the area median income.
- The bank provided \$2.2 million in construction financing to develop City Arts II, a 60-unit affordable housing development in Baltimore, MD. All units are restricted to incomes at or below 60 percent of the area median income. The bank also provided a separate construction loan for \$7.1 million for this housing development.
- The bank provided \$8 million in construction financing for the historic rehabilitation of the former Columbus School in Baltimore, MD to create 49 units of affordable housing. All units are restricted to incomes at or below 50 percent of the area median income. Additionally, eight of the units receive project-based Section 8 rental assistance that serve non-elderly disabled tenants.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Maryland, lending under the MHA and HARP

programs accounted for 84 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the California-Lexington Park, MD MSA and Maryland Non-MSA is weaker than the overall Outstanding Lending Test performance in the state of Maryland primarily due to weaker geographic and borrower income distributions and lower levels of CD lending that have a neutral effect on Lending Test performance in those assessment areas.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Maryland is rated Outstanding. Investment performance is excellent in the Baltimore-Columbia-Towson, MD MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Baltimore-Columbia-Towson, MD MSA

In the Baltimore-Columbia-Towson, MD MSA, Bank of America has an excellent level of community development investments. The bank made 264 CD investments during the current evaluation period totaling \$224.9 million. Approximately \$200.9 million or 89 percent of the current period investment dollars supported over 1,900 units of affordable housing. In addition, the bank has 95 CD investments totaling \$60.4 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$285.3 million or 12.5 percent of allocated Tier 1 Capital. The majority of current period investments are innovative or complex with LIHTCs, Historic Tax Credits, and New Markets Tax Credits representing approximately \$137.9 million or 61 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$13.5 million in a LIHTC to fund the construction of City Arts II Apartments, a 60-unit affordable housing development in Baltimore, MD. All units are restricted to incomes at or below 60 percent of the area median income. Bank of America has also provided the construction loans for this development.
- The bank invested \$2.4 million in a fund that acquires direct and indirect interests in partnerships that own affordable housing developments throughout the U.S. partially funded with federal LIHTCs. This transaction represents the Foxwell Memorial Apartments in Baltimore, MD that provides 151 units of affordable housing.

- The bank invested \$12.3 million in a LITHC to finance the rehabilitation of Govans Manor, a 191-unit mixed-income housing development in Baltimore, MD for seniors and non-elderly disabled individuals. The development has 186 units restricted to incomes at or below 60 percent of the area median income and 5 units at market rates.

QUALIFIED INVESTMENTS		Geography: MARYLAND				Evaluation Period: January 1, 2012 to December 31, 2016			
MA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Baltimore, MD	95	60,378	264	224,894	359	285,272	97.62	9	22,583
Limited Review									
California, MD	1	122	12	838	13	960	0.33	0	0
Maryland Non-MSA	7	1,865	14	1,442	21	3,307	1.13	0	0
MARYLAND - Statewide	0	0	23	202	23	202	0.07	0	0
MARYLAND - Non Assessed	4	2,088	12	404	16	2,492	0.85	0	0
MARYLAND	107	64,454	325	227,780	432	292,234	100.00	9	22,583

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Maryland Non-MSA is consistent with the Outstanding Investment Test performance in the state of Maryland. Performance in the California-Lexington Park, MD MSA is weaker than the overall Outstanding Investment Test performance in the state of Maryland primarily due significantly lower levels of CD investments relative to the bank's size and resources in the assessment area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Maryland is rated Outstanding. Service Test performance is excellent in the Baltimore-Columbia-Towson, MD MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Baltimore-Columbia-Towson, MD MSA

In the Baltimore-Columbia-Towson, MD MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 81 financial centers with the

distribution of the population. The bank has six financial centers in low-income geographies or 7.4 percent of its financial centers where 10.6 percent of the population lives. The bank has 20 financial centers or 19.8 percent of its financial centers located in moderate-income geographies where 20.6 percent of the population lives.

Examiners also considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customers' residency. In two of six ADS platforms, the percentage of customers in low- and moderate-income geographies using the platform exceeded the percentage of the population in low- and moderate-income geographies.

The bank has 21 financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to moderate-income census tracts. The bank has 5 financial centers adjacent to low-income geographies and 16 financial centers adjacent to moderate-income geographies. The adjacent financial centers help improve access to retail banking services to individuals and businesses in low- and moderate-income geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened three financial centers in upper-income geographies. The bank closed nineteen throughout the assessment area. The bank closed two financial centers in low-income geographies, four in moderate-income geographies, and the remaining thirteen in middle- and upper-income geographies. The OCC received comments from a coalition of 14 community organizations expressing concerns over the bank's record of financial center closures in Baltimore City, particularly in low- and moderate-income areas that are also predominantly minority. Financial center closures are business decisions the bank makes only after considering a number of factors, including customer traffic, crime, profitability, access to the nearest financial center, and effect to the community. Despite these closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are generally consistent throughout the assessment area. Financial centers are generally open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 12:00 pm on Saturday. Approximately 21 percent of the financial centers open for Saturday banking are open 9:00 am to 1:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Baltimore-Columbia-Towson MD MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	100	14.7	287,685	10.6	6	7.4	20	7.4	0	0.0	2	10.5
Moderate	147	21.6	557,923	20.6	16	19.8	68	25.3	0	0.0	4	21.1
Middle	227	33.3	963,465	35.5	31	38.3	102	37.9	0	0.0	8	42.1
Upper	197	28.9	887,616	32.7	28	34.6	79	29.4	3	100.0	5	26.3
NA	10	1.5	13,800	0.5	0	0.0	0	0.0	0	0.0	0	0.0
Totals	681	100.0	2,710,489	100.0	81	100.0	269	100.0	3	100.0	19	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Baltimore-Columbia-Towson, MD MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 159 community development services targeted to low- and moderate-income individuals. Employees provided 100 financial education and foreclosure prevention workshops for 1,368 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 49 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, eight employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the California-Lexington Park, MD MSA and Maryland Non-MSA is weaker than the overall Outstanding Service Test performance in the state of Maryland primarily due to the limited retail banking presence in those assessment areas.

State of Massachusetts

CRA Rating for Massachusetts²⁹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Good volume of loans originated or purchased within the assessment areas;
- Excellent distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively high level of CD lending that has a positive effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Massachusetts

The state of Massachusetts is Bank of America's 32nd largest rating area based on its total deposits in the state when excluding the Boston-Cambridge-Newton, MA-NH, Providence-Warwick, RI-MA, and Worcester, MA-CT Multistate MSAs. Examiners excluded the multistate MSAs from the analysis of the state of Massachusetts because examiners evaluated the multistate MSAs as separate rating areas. As of June 30, 2016, the bank maintained approximately \$3 billion or 0.3 percent of its total domestic deposits in financial centers in areas of the state of Massachusetts that do not include the multistate MSAs. Of the 38 depository financial institutions operating in the state, Bank of America, with a deposit market share of 10.7 percent, is the third largest. Competitors with deposit market shares greater than 5 percent include TD Bank (11.8 percent), Berkshire Bank (11.5 percent), The Cape Code Five Cents Savings Bank (8.6 percent), and Peoples Bank (5.9 percent). As of December 31, 2016, the bank operated 86 financial centers and 277 ATMs in Massachusetts.

Refer to the community profiles for the state of Massachusetts in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

²⁹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in Massachusetts

Examiners selected the Springfield, MA MSA for a full-scope review and the Barnstable Town, MA MSA and Massachusetts Non-MSA for limited-scope reviews. While the Springfield, MA MSA carries approximately 63 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in Massachusetts, the conclusions and ratings for the state are based on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 6,736 home mortgage loans totaling \$2.1 billion, 10,990 small loans to businesses totaling \$322.3 million, 86 small loans to farms totaling \$1.8 million, and 7 CD loans totaling \$54.9 million. Loan volumes include loans that originated or purchased in the Worcester, MA MSA prior to the MSA's designation as a multistate MSA in 2014. Based on loan volume, examiners weighted small loans to businesses, representing 62 percent of the volume, the most followed by home mortgage loans at 38 percent, and small loans to farms at less than 1 percent.

Examiners contacted one local community development organization. According to the contact, Springfield continues to struggle economically with high poverty and unemployment rates. The city is predominantly low-income. Local small businesses need loans with flexible loan terms and interest rates as well as financial education. The organization also identified the need for financial institutions to purchase historic and low-income housing tax credits to help promote affordable housing, revitalization, and economic development in the region.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Massachusetts is rated Outstanding, based on good lending activity, excellent geographic distribution, good borrower income distribution, and a relatively high level of CD lending that has a positive effect on the Lending Test rating. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Massachusetts is good. Lending activity is adequate in the Springfield, MA MSA. Excellent lending activity in the limited-scope assessment areas positively affected the overall lending activity conclusion.

Springfield, MA MSA

Lending activity in the Springfield, MA MSA is adequate. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 13.9 percent. The bank ranks first among 21 depository financial institutions, which places it in the top 5 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.6 percent based on the number of home mortgage loans originated or purchased. The bank ranks 19th among 334 home mortgage lenders in the assessment area, which places it in the top 6 percent of lenders. According to peer small business data for 2016, the bank has a 6.7 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fifth among 79 small business lenders, which places it in the top 7 percent of lenders. For small loans to farms, the bank has a market share of 4.7 percent based on the number of small loans to farms originated or purchased. The bank ranks eighth among 12 farm lenders, placing it in the bottom 33 percent of lenders. During the evaluation period, the bank closed 44 percent of its financial centers in the MSA, which resulted in fewer loan applications for home mortgage loans and small loans to businesses. The bank's market share and ranking for home mortgage loans have steadily declined from being the second largest lender in the market with a market share of 4.6 percent in 2013 to the 17th largest in 2016. Considering the bank's shrinking retail banking presence in the MSA over the evaluation period, overall lending activity is adequate.

LENDING VOLUME		Geography: MASSACHUSETTS						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Springfield, MA	38.45	2,369	396,012	4,453	110,453	28	1,402	2	21,927	6,852	529,794	63.43
Limited Review												
Barnstable Town, MA	24.85	1,776	676,207	2,615	83,577	32	185	5	33,008	4,428	792,977	28.10
Massachusetts Non-MSA	9.95	502	578,342	1,259	28,612	12	164	0	0	1,773	607,118	8.47
Worcester, MA	26.75	2,089	426,891	2,663	99,655	14	53	2	25,213	4,768	551,812	0.00
MASSACHUSETTS	100.00	6,736	2,077,452	10,990	322,297	86	1,804	9	80,147	17,821	2,481,700	100.00
(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.												
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.												
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.												

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is excellent. The distribution is excellent in the Springfield, MA MSA.

Springfield, MA MSA

The geographic distribution of home mortgage loans in the Springfield, MA MSA is excellent. Performance is excellent in low-income geographies and excellent in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 4.2 percent is higher than the 3.3 percent of owner-occupied housing units in low-income geographies and it is higher than the 3.3 percent for aggregate lenders. The distribution in moderate-income geographies at 17.9 percent is higher than the 15.4 percent of owner-occupied housing units in moderate-income geographies and it is higher than the 15.2 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Springfield MA MSA	782	139,253	44.7	15,369	3.3	4.2	3.3	15.4	17.9	15.2	41.4	37.0	40.6	40.0	40.9	41.0	0.0	0.0	0.0
LS Barnstable Town MA MSA	692	298,045	39.6	11,681	0.3	0.1	0.4	10.2	11.9	11.7	77.2	76.0	75.5	12.3	12.0	12.4	0.0	0.0	0.0
LS Massachusetts Non-MSA	275	361,348	15.7	3,773	0.0	0.0	0.0	15.3	3.3	11.3	63.5	50.2	59.8	21.2	46.5	28.9	0.0	0.0	0.0
Total	1,749	798,646	100.0	30,823	2.0	1.9	1.8	13.8	13.2	13.4	54.7	54.5	56.1	29.5	30.4	28.7	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Springfield, MA MSA.

Springfield, MA MSA

The geographic distribution of small loans to businesses in the Springfield, MA MSA is excellent. Performance is good in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 11 percent is lower than the 14 percent of businesses in low-income geographies and it is slightly lower than the 11.5 percent performance for aggregate lenders. The distribution in moderate-income geographies at 17.4 percent is higher than the 17.2 percent of businesses in moderate-income geographies and it exceeds the 15.1 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Busines sses	% Bank Loans	Aggre gate	% Busine sses	% Bank Loans	Aggre gate	% Busine sses	% Bank Loans	Aggre gate	% Busine sses	% Bank Loans	Aggre gate	% Busine sses	% Bank Loans	Aggre gate
FS Springfield MA MSA	2,584	59,147	50.8	12,761	14.0	11.0	11.5	17.2	17.4	15.1	34.2	33.6	35.6	34.3	37.9	37.6	0.2	0.2	0.2
LS Barnstable Town MA MSA	1,584	50,746	31.2	6,861	7.5	7.1	6.9	14.4	16.0	14.1	65.6	64.8	67.0	12.5	12.2	12.1	0.0	0.0	0.0
LS Massachusetts Non-MSA	914	16,418	18.0	2,794	0.0	0.0	0.0	17.0	7.2	9.8	54.8	49.2	56.4	28.2	43.5	33.8	0.0	0.0	0.0
Total	5,082	126,311	100.0	22,416	10.1	7.8	8.7	16.3	15.1	14.1	46.9	46.1	47.8	26.6	30.9	29.3	0.1	0.1	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is poor. The distribution is poor in the Springfield, MA MSA.

Springfield, MA MSA

The geographic distribution of small loans to farms in the Springfield, MA MSA is poor. Performance is poor in low-income geographies and poor in moderate-income geographies. The bank did not originate or purchase any small loans to farms in low-income geographies where there are 2.1 percent of the farms. Performance is consistent with aggregate lenders. The bank did not originate or purchase any small loans to farms in moderate-income geographies where there are 10.6 percent of the farms. Performance is also below the 8.9 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS Springfield MA MSA	12	672	43.5	43	2.1	0.0	0.0	7.6	0.0	7.0	38.6	50.0	37.2	51.7	58.3	53.5	0.0	0.0	2.3
LS Barnstable Town MA MSA	19	121	71.4	35	1.8	0.0	0.0	9.8	20.0	8.6	76.4	57.9	65.7	12.0	40.0	25.7	0.0	0.0	0.0
LS Massachusetts Non-MSA	6	41	16.7	28	0.0	0.0	0.0	6.5	0.0	3.6	65.5	83.3	71.4	28.0	50.0	25.0	0.0	0.0	0.0
Total	37	834	100.0	106	1.5	0.0	0.0	8.0	14.3	6.6	56.8	56.8	55.7	33.6	37.8	36.8	0.0	0.0	0.9

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Springfield, MA MSA.

Springfield, MA MSA

The distribution of home mortgage loans by borrower income in the Springfield, MA MSA is good. The distribution is adequate to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 7.5 percent is lower than the 23.6 percent of low-income families in the MSA; however, the bank’s performance is higher than the 5.5 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 19.1 percent exceeds the 16.1 percent of moderate-income families and it is slightly lower than the 19.2 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate
FS Springfield MA MSA	782	139,253	44.7	15,369	23.6	7.5	5.5	16.1	19.1	19.2	19.1	23.9	23.2	41.2	40.8	37.1	0.0	8.7	15.1
LS Barnstable Town MA MSA	692	298,045	39.6	11,681	18.5	5.5	3.0	18.5	7.4	12.3	23.5	12.1	19.1	39.4	68.6	55.0	0.0	6.4	10.6
LS Massachusetts Non-MSA	275	361,348	15.7	3,773	20.1	3.3	5.8	17.7	8.0	15.7	22.5	9.5	18.2	39.8	68.4	46.9	0.0	10.9	13.4
Total	1,749	798,646	100.0	30,823	21.9	6.1	4.6	16.9	12.7	16.1	20.6	17.0	21.0	40.6	56.1	45.1	0.0	8.1	13.2

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Springfield, MA MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 40 percent of its small loans to businesses.

Springfield, MA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Springfield, MA MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 50.9 percent is lower than the 76.4 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 40.8 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Springfield MA MSA	2,584	59,147	50.8	12,761	76.4	50.9	40.8	5.7	10.4	17.9	38.8
LS Barnstable Town MA MSA	1,584	50,746	31.2	6,861	80.1	49.6	45.8	4.3	8.8	15.7	41.6
LS Massachusetts Non-MSA	914	16,418	18.0	2,794	78.1	49.6	47.2	4.6	7.7	17.3	42.8
Total	5,082	126,311	100.0	22,416	77.8	50.2	43.1	5.1	9.4	17.1	40.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Springfield, MA MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 35 percent of its small loans to farms.

Springfield, MA MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Springfield, MA MSA is good. Based on farms with known revenues, the proportion of the bank's small loans to farms at 70 percent is lower than the 96.2 percent of farms with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 32.6 percent for aggregate lenders, overall performance is good.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms w with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Springfield MA MSA	12	672	43.5	43	96.2	70.0	32.6	2.2	0.0	1.7	41.7
LS Barnstable Town MA MSA	19	121	71.4	35	96.1	68.4	62.9	1.6	10.0	2.4	26.3
LS Massachusetts Non-MSA	6	41	16.2	28	96.1	75.0	39.3	2.6	0.0	1.3	75.0
Total	37	834	100.0	106	96.1	62.2	44.3	2.1	7.1	1.8	35.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a positive effect overall on the bank's Lending Test performance in the state of Massachusetts.

Springfield, MA MSA

In the Springfield, MA MSA, CD lending has a positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated two CD loans totaling \$21.9 million that primarily helped provide 126 units of affordable housing. CD lending represents 9.1 percent of the allocated Tier 1 Capital.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Massachusetts, lending under the MHA and HARP programs accounted for 82 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Barnstable Town, MA MSA is consistent with the Outstanding Lending Test performance in the state of Massachusetts. Performance in the Massachusetts Non-MSA is weaker than the Outstanding Lending Test performance in the state of Massachusetts primarily due to weaker geographic and borrower income distributions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Massachusetts is rated Outstanding. Investment performance is excellent in the Springfield, MA MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Springfield, MA MSA

In the Springfield, MA MSA, Bank of America has an excellent level of CD investments. The bank made 41 CD investments during the current evaluation period totaling \$55.6 million. Approximately \$55.3 million or 99 percent of the current period investment dollars supported 662 units of affordable housing. In addition, the bank has 16 CD investments totaling \$10.2 million it made during a prior evaluation period that are still outstanding and continue to provide

benefit to the community. Prior period and current period investments total \$65.8 million or 27.4 percent of allocated Tier 1 Capital. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$48.7 million or 88 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$1 million in a LIHTC that supports two affordable housing developments with 60 units of affordable housing in Springfield, MA. All units are restricted to incomes at or below 60 percent of the area median income. The bank also provided the construction financing for this project.
- The bank invested \$22.4 million in a LIHTC fund that invests indirectly in a portfolio of four LIHTC properties. This transaction represents Colonial Estates, a 500-unit mixed income rehabilitation project in Springfield, MA. The development includes 450 units restricted to incomes at or below 60 percent of the area median income and 50 units at market rates.
- The bank invested \$24.4 million in LIHTCs to finance the gut renovation of Mill Building No. 10, a historical mill building in Ludlow, MA. The developer is converting the building into 75 apartment units that are restricted to senior tenants aged 55 and over. The development will include 66 units restricted to incomes at or below 60 percent of the area median income and 9 units at market rates. The bank also provided the construction financing for this project.

QUALIFIED INVESTMENTS		Geography: MASSACHUSETTS				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Springfield, MA	16	10,178	41	55,626	57	65,804	80.20	2	22,411
Limited Review									
Barnstable Town, MA	13	2,710	25	8,621	38	11,331	13.81	1	5,045
Massachusetts Non-MSA	3	1,166	22	811	25	1,977	2.41	0	0
MASSACHUSETTS - Statewide	0	0	34	935	34	935	1.14	0	0
MASSACHUSETTS - Non Assessed	3	618	14	1,389	17	2,007	2.45	0	0
MASSACHUSETTS	35	14,673	136	67,381	171	82,054	100.00	3	27,456

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Barnstable Town, MA MSA is consistent with the Outstanding Investment Test performance in the state of Massachusetts. Performance in the Massachusetts Non-MSA is weaker than the overall Outstanding Investment Test performance in the state of Massachusetts primarily due to lower levels of CD investments relative to the bank's size and resources in the assessment area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Massachusetts is rated High Satisfactory. Service Test performance is adequate in the Springfield, MA MSA. Performance in limited-scope assessment areas has a positive effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Springfield, MA MSA

In the Springfield, MA MSA, the bank's service delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 15 financial centers with the distribution of the population. The bank has no financial centers in low-income geographies where 13 percent of the population lives. The bank has five financial centers or 33.3 percent of its financial centers located in moderate-income geographies where 20 percent of the population lives.

Examiners also considered the bank's alternative delivery systems, including cash dispensing ATMs, full-service ATMs, telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customers' residency. In four of six ADS platforms, the percentage of customers in low- and moderate-income geographies using the platform exceeded the percentage of the population in low- and moderate-income geographies.

The bank has two financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. The adjacent financial centers help improve access to retail banking services to individuals in low- and moderate-income geographies.

Financial center openings and closings did adversely affect the accessibility of retail banking services, particularly in low-income geographies and to low- and moderate-income individuals. The bank closed all four of its financial centers in low-income geographies. During the evaluation period, the bank closed 12 financial centers or 44 percent of its financial centers. The bank closed four financial centers in low-income geographies, three in moderate-income geographies, and five in middle- and upper-income geographies.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are

generally consistent throughout the assessment area. Financial centers are generally open 9:00 am to 4:00 pm Monday through Friday and 9:00 am to 12:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Springfield MA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	22	15.8	80,693	13.0	0	0.0	13	16.3	0	0.0	4	33.3
Moderate	26	18.7	124,059	20.0	5	33.3	19	23.8	0	0.0	3	25.0
Middle	48	34.5	215,636	34.7	7	46.7	25	31.3	0	0.0	4	33.3
Upper	41	29.5	198,343	31.9	2	13.3	21	26.3	0	0.0	1	8.3
NA	2	1.4	2,839	0.5	1	6.7	2	2.5	0	0.0	0	0.0
Totals	139	100.0	621,570	100.0	15	100.0	80	100.0	0	100.0	12	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Springfield, MA MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 49 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 21 low- and moderate-income individuals and provided 15 financial education workshops for 987 students primarily from low- and moderate-income families. Employees participated in six webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, seven employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Barnstable Town, MA MSA and Massachusetts Non-MSA is stronger than the overall High Satisfactory Service Test performance in the state of Massachusetts. Performance is stronger primarily due to the distribution of financial centers, particularly in low-and moderate-income geographies.

State of Michigan

CRA Rating for Michigan³⁰:	Outstanding
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>High Satisfactory</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively high level of CD lending that has a positive effect on overall lending performance;
- Significant level and good responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Michigan

The state of Michigan is Bank of America's 15th largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$16.6 billion or 1.3 percent of its total domestic deposits in financial centers within the state of Michigan. Of the 134 depository financial institutions operating in the state, Bank of America, with a deposit market share of 8.3 percent, is the fourth largest. Competitors with deposit market shares greater than 5 percent include JPMorgan Chase Bank, N.A. (21 percent), Comerica Bank (13.5 percent), PNC Bank (8.7 percent), and Fifth Third Bank (8 percent). As of December 31, 2016, the bank operated 120 financial centers and 199 ATMs in Michigan.

Examiners used the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Detroit-Warren-Dearborn, MI MSA, Bank of America reported an additional \$777.7 million in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

³⁰ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the community profiles for the state of Michigan in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Michigan

Examiners selected the Detroit-Warren-Dearborn, MI MSA for a full-scope review and the Ann Arbor, MI MSA, Grand Rapids-Wyoming, MI MSA, and Lansing-East Lansing, MI MSA for limited-scope reviews. While the Detroit-Warren-Dearborn, MI MSA carries approximately 88 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in Michigan, examiners based the conclusions and ratings for the state on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 30,262 home mortgage loans totaling \$5 billion, 31,635 small loans to businesses totaling \$1.6 billion, 253 small loans to farms totaling \$6 million, and 18 CD loans totaling \$119.1 million. Lending volumes include loans originated or purchased in the Battle Creek, MI MSA, Bay City, MI MSA, Flint, MI MSA, Kalamazoo-Portage, MI MSA, Monroe, MI MSA, Muskegon-Norton Shores, MI MSA, Saginaw-Saginaw Township North, MI MSA, and the counties of Gratiot, Midland, Ionia, and Newaygo. The bank no longer designates these metropolitan areas and counties as assessment areas due to the bank's closure or sale of all financial centers and deposit-taking ATMs in those communities. Based on loan volume, examiners weighted small loans to businesses, representing 51 percent of the volume, the most followed by home mortgage loans at 49 percent, and small loans to farms at less than 1 percent.

Examiners contacted one local community development organization. According to the contact, quality employment and affordable housing are the primary needs in the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MICHIGAN

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Michigan is rated Outstanding, based on excellent lending activity, good geographic distribution, good borrower income distribution, and a relatively high level of CD lending that has a positive effect on the Lending Test rating. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Michigan is excellent. Lending activity is excellent in the Detroit-Warren-Dearborn, MI MSA.

Detroit-Warren-Dearborn, MI MSA

Lending activity in the Detroit-Warren-Dearborn, MI MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 12 percent. The bank ranks third among 46 depository financial institutions in the assessment area, which places it in the top 7 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.8 percent based on the number of home mortgage loans originated or purchased. The bank ranks ninth among 588 home mortgage lenders, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has a 5.7 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks sixth among 151 small business lenders, which places it in the top 4 percent of lenders. According to peer small farm data for 2016, the bank has a 7.8 percent market share based on the number of small loans to farms originated or purchased. The bank ranks fifth among 18 farm lenders, which places it in the top 28 percent of lenders. Considering the bank's higher ranking for home mortgage loans and its ranking for small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME												Geography: MICHIGAN		Evaluation Period: January 1, 2012 to December 31, 2016	
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)				
Full Review															
Detroit, MI	72.14	20,934	3,499,335	23,819	1,166,453	75	473	17	105,660	44,845	4,771,921	87.77			
Limited Review															
Ann Arbor, MI	6.11	2,127	499,131	1,650	44,231	18	292	1	13,483	3,796	557,137	3.28			
Battle Creek, MI	0.58	202	20,302	153	17,115	7	548	0	0	362	37,965	0.00			
Bay City, MI	0.37	135	14,294	88	1,969	4	17	0	0	227	16,280	0.00			
Flint, MI	2.23	949	107,095	435	34,067	4	18	0	0	1,388	141,180	0.00			
Grand Rapids, MI	7.93	2,296	314,418	2,572	171,532	63	952	0	0	4,931	486,902	5.64			
Holland, MI	1.28	470	66,696	319	13,382	7	483	0	0	796	80,561	0.00			
Kalamazoo, MI	1.66	625	81,721	392	23,558	17	93	0	0	1,034	105,372	0.00			
Lansing, MI	4.72	1,370	182,552	1,524	87,494	39	2,081	0	0	2,933	272,127	3.30			
Monroe, MI	1.06	480	133,078	171	5,520	7	287	0	0	658	138,885	0.00			
Muskegon, MI	0.81	346	35,073	157	9,977	3	11	0	0	506	45,061	0.00			
Saginaw, MI	0.76	254	26,822	220	10,798	1	7	0	0	475	37,627	0.00			
Michigan Non-MSA	0.35	74	8,942	135	3,100	8	738	0	0	217	12,780	0.00			
MICHIGAN	100.00	30,262	4,989,459	31,635	1,589,196	253	6,000	18	119,143	62,168	6,703,798	100.00			
(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.															
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.															
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.															

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is adequate. The distribution is adequate in the Detroit-Warren-Dearborn, MI MSA.

Detroit-Warren-Dearborn, MI MSA

The geographic distribution of home mortgage loans in the Detroit-Warren-Dearborn, MI MSA is adequate. Performance is adequate in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 0.9 percent is lower than the 4.4 percent of owner-occupied housing units in low-income geographies and it is slightly lower than the 1.1 percent for aggregate lenders. The distribution in moderate-income geographies at 9.2 percent is lower than the 19.8 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 11 percent for aggregate lenders.

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
FS Detroit-Warren-Dearborn MI MSA	8,125	1,525,631	77.6	148,312	4.4	0.9	1.1	19.8	9.2	11.0	40.9	38.1	41.8	34.9	51.8	46.1	0.0	0.0	0.0
LS Ann Arbor MI MSA	992	268,152	9.5	13,316	4.0	1.5	2.3	14.9	9.6	12.1	51.9	42.4	53.6	29.3	46.5	32.0	0.0	0.0	0.0
LS Grand Rapids-Wyoming MI MSA	890	139,128	8.5	41,687	2.0	1.3	1.8	16.3	12.5	14.7	55.2	50.2	52.7	26.5	36.0	30.9	0.0	0.0	0.0
LS Lansing-East Lansing MI MSA	458	70,564	4.4	14,743	3.6	2.0	2.1	15.0	12.2	11.4	52.9	49.8	53.5	28.5	36.0	33.1	0.0	0.0	0.0
Total	10,465	2,003,475	100.0	218,058	4.0	1.1	1.4	18.7	9.6	11.8	44.6	40.1	45.4	32.8	49.2	41.4	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Detroit-Warren-Dearborn, MI MSA.

Detroit-Warren-Dearborn, MI MSA

The geographic distribution of small loans to businesses in the Detroit-Warren-Dearborn, MI MSA is excellent. Performance is good in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 5 percent is lower than the

6.6 percent of businesses in low-income geographies, but it exceeds the 4.7 percent performance for aggregate lenders. The distribution in moderate-income geographies at 17.4 percent is lower than the 19.2 percent of businesses in moderate-income geographies, but it exceeds the 16.5 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Detroit-Warren-Dearborn MI MSA	15,775	665,238	80.9	99,202	6.6	5.0	4.7	19.2	17.4	16.5	36.9	35.7	34.6	36.9	41.3	43.8	0.5	0.5	0.4
LS Ann Arbor MI MSA	1,068	25,672	5.5	8,023	4.8	3.7	3.1	12.3	10.5	10.8	49.8	51.1	50.6	31.4	34.6	35.3	1.7	0.0	0.2
LS Grand Rapids-Wyoming MI MSA	1,723	102,612	8.8	20,828	4.1	4.1	3.8	19.1	18.5	15.0	49.5	45.9	46.6	27.3	31.5	34.6	0.0	0.0	0.0
LS Lansing-East Lansing MI MSA	925	52,412	4.7	5,803	3.8	3.9	5.1	23.5	23.8	21.7	42.7	37.3	40.3	27.9	32.5	32.1	2.1	2.5	0.9
Total	19,491	845,934	100.0	133,856	5.9	4.8	4.5	19.0	17.4	16.1	40.1	37.6	37.7	34.4	39.6	41.3	0.6	0.5	0.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is poor. The distribution is poor in the Detroit-Warren-Dearborn, MI MSA.

The geographic distribution of small loans to farms in the Detroit-Warren-Dearborn, MI MSA is poor. Performance is poor in low-income geographies and very poor in moderate-income geographies. The distribution in low-income geographies at 0 percent is lower than the 3.4 percent of farms in low-income geographies and it is lower than the 0.5 percent performance for aggregate lenders. The distribution in moderate-income geographies at 7.7 percent is lower than the 18 percent of farms in moderate-income geographies and it is lower than the 17.9 percent performance for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Detroit-Warren-Dearborn MI MSA	39	293	36.1	190	3.4	0.0	0.5	18.0	7.7	17.9	47.0	51.3	51.1	31.4	41.0	30.0	0.2	0.0	0.5
LS Ann Arbor MI MSA	9	142	8.3	54	1.3	0.0	0.0	5.8	0.0	0.0	68.7	88.9	70.4	24.2	50.0	29.6	0.0	0.0	0.0
LS Grand Rapids-Wyoming MI MSA	41	805	38.0	361	0.6	0.0	0.0	11.6	16.0	13.6	61.5	63.4	65.1	26.3	26.8	21.3	0.0	0.0	0.0
LS Lansing-East Lansing MI MSA	19	832	20.0	138	1.5	0.0	0.7	5.9	14.3	0.7	67.0	47.4	68.1	25.1	42.1	30.4	0.5	0.0	0.0
Total	108	2,072	100.0	743	2.4	0.0	0.3	14.2	8.3	11.3	54.3	58.3	62.5	28.9	33.3	25.8	0.2	0.0	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Detroit-Warren-Dearborn, MI MSA.

Detroit-Warren-Dearborn, MI MSA

The distribution of home mortgage loans by borrower income in the Detroit-Warren-Dearborn, MI MSA is good. The distribution is adequate to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 8.7 percent is lower than the 22 percent of low-income families in the MSA; however, the bank’s performance is higher than the 7.8 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 16 percent is lower than the 17.3 percent of moderate-income families and lower than the 17 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Detroit-Warren-Dearborn MI MSA	8,125	1,525,631	77.6	148,312	22.0	8.7	7.8	17.3	16.0	17.0	19.9	21.3	21.8	40.8	47.5	39.8	0.0	6.6	13.6
LS Ann Arbor MI MSA	992	268,152	9.5	13,316	21.7	6.9	9.1	16.9	14.4	21.1	21.4	21.6	22.7	40.0	54.3	36.3	0.0	2.8	10.8
LS Grand Rapids-Wyoming MI MSA	890	139,128	8.5	41,687	19.6	13.5	8.0	18.4	20.4	20.4	22.5	20.0	22.0	39.5	36.4	33.6	0.0	9.7	16.0
LS Lansing-East Lansing MI MSA	458	70,564	4.4	14,743	20.6	15.9	7.7	17.8	15.7	20.0	21.9	22.5	23.4	39.8	34.1	35.5	0.0	11.8	13.3
Total	10,465	2,003,475	100.0	218,058	21.5	9.2	7.9	17.5	16.2	18.1	20.6	21.3	22.0	40.4	46.6	38.1	0.0	6.7	13.9

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Detroit-Warren-Dearborn, MI MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 29 percent of its small loans to businesses.

Detroit-Warren-Dearborn, MI MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Detroit-Warren-Dearborn, MI MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 55.4 percent is lower than the 78.6 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 42 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Detroit-Warren-Dearborn MI MSA	15,775	665,238	80.9	99,202	78.6	55.4	42.0	6.4	16.0	15.0	28.7
LS Ann Arbor MI MSA	1,068	25,672	5.5	8,023	77.7	58.7	42.1	5.9	10.1	16.4	31.2
LS Grand Rapids-Wyoming MI MSA	1,723	102,612	8.8	20,828	76.2	43.5	39.6	7.6	23.3	16.2	33.2
LS Lansing-East Lansing MI MSA	925	52,412	4.7	5,803	75.7	50.3	44.2	5.7	22.2	18.6	27.6
Total	19,491	845,934	100.0	133,856	77.9	54.2	41.7	6.5	16.6	15.5	29.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate overall. The distribution is adequate in the Detroit-Warren-Dearborn, MI MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 36 percent of its small loans to farms.

Detroit-Warren-Dearborn, MI MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Detroit-Warren-Dearborn, MI MSA is adequate. Based on businesses with known revenues, the proportion of the bank's small loans to farms at 51.3 percent is lower than the 96.5 percent of farms with gross annual revenues of \$1 million or less. Considering the bank's distribution is higher than the 31.6 percent for aggregate lenders, overall performance is adequate.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Detroit-Warren-Dearborn MI MSA	39	293	39.0	190	96.5	51.3	31.6	2.2	6.7	1.3	43.6
LS Ann Arbor MI MSA	9	142	10.0	54	96.7	83.3	37.0	2.0	42.9	1.3	33.3
LS Grand Rapids-Wyoming MI MSA	41	805	38.0	361	95.1	41.5	51.5	3.8	22.0	1.1	36.6
LS Lansing-East Lansing MI MSA	19	832	17.6	138	97.5	63.2	36.2	1.5	20.0	1.1	31.6
Total	108	2,072	100.0	743	96.3	50.0	42.5	2.4	13.9	1.2	36.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a positive effect overall on the bank's Lending Test performance in the state of Michigan.

Detroit-Warren-Dearborn, MI MSA

In the Detroit-Warren-Dearborn, MI MSA, CD lending has a positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated 15 CD loans totaling \$106 million that primarily helped provide 274 units of affordable housing. CD lending represents 6.1 percent of the allocated Tier 1 Capital.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Michigan, lending under the MHA and HARP

programs accounted for 82 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Ann Arbor, MI MSA, Grand Rapids-Wyoming, MI MSA, and Lansing-East Lansing, MI MSA is consistent with the Outstanding Lending Test performance in the state of Michigan.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Michigan is rated High Satisfactory. Investment performance is excellent in the Detroit-Warren-Dearborn, MI MSA. Performance in limited-scope assessment areas has a negative effect on the state rating.

Detroit-Warren-Dearborn, MI MSA

In the Detroit-Warren-Dearborn, MI MSA, Bank of America has an excellent level of CD investments. The bank made 318 CD investments during the current evaluation period totaling \$176.9 million. Approximately \$138 million or 78 percent of the current period investment dollars supported 1,018 units of affordable housing. In addition, the bank has 242 CD investments totaling \$36 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$212.9 million or 12.3 percent of allocated Tier 1 Capital. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$126.5 million or 71 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$10.9 million in a LIHTC to support City Hall Artist Lofts, a 53-unit multifamily housing development in Detroit, MI. The project is an adaptive reuse that will transform the historic 1022 Georgian-Revival style Dearborn City Hall into adaptive live/work spaces for artists. All units are restricted to incomes at or below 60 percent of the area median income. Bank of America is also providing the construction loan for this project.
- The bank invested more than \$4 million into Local Initiatives Support Corporation (LISC), a certified CDFI and CDE. LISC helps community residents convert distressed neighborhoods into healthy and sustainable communities by providing grants, loans, equity investments, and technical assistance to local Community Development Corporations (CDCs) in support of neighborhood redevelopment. The organization used

the funds to capitalize the Detroit Home Rehabilitation Fund, a new home repair finance program launched in partnership with the City of Detroit.

- The bank invested \$24.8 million in a federal Historic Tax Credit and a New Markets Tax Credit for the construction and renovation of the historic David Whitney Building in downtown Detroit. The project will revitalize and stabilize a low-income area. The building is located in a low-income census tract. The building will be redeveloped into 85 market rent units and 20 units of housing affordable to families earning 80 percent of the area median income. The project will also include a 136-room Aloft Hotel that will create 50 to 75 permanent jobs.

QUALIFIED INVESTMENTS		Geography: MICHIGAN				Evaluation Period: January 1, 2012 to December 31, 2016			
		Prior Period Investments*		Current Period Investments		Total Investments		Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Detroit, MI	242	35,979	318	176,935	560	212,915	89.56	4	2,480
Limited Review									
Ann Arbor, MI	8	169	26	2,308	34	2,476	1.04	0	0
Grand Rapids, MI	28	1,142	32	4,629	60	5,771	2.43	0	0
Lansing, MI	16	460	24	2,226	40	2,687	1.13	0	0
MICHIGAN - Statewide	0	0	15	108	15	108	0.05	0	0
MICHIGAN - Non Assessed	116	10,342	90	3,433	206	13,775	5.79	0	0
MICHIGAN	410	48,092	505	189,639	915	237,731	100.00	4	2,480
(*) '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 bank's financial reporting system.									

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Ann Arbor, MI MSA, Grand Rapids-Wyoming, MI MSA, and Lansing-East Lansing, MI MSA is weaker than the overall High Satisfactory Investment Test performance in the state of Michigan primarily due to significantly lower levels of CD investments relative to the bank's size and resources in those assessment areas. The poor performance in each limited-scope assessment area negatively affected the Investment Test rating.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Michigan is rated High Satisfactory. Service Test performance is good in the Detroit-Warren-Dearborn, MI MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Detroit-Warren-Dearborn, MI MSA

In the Detroit-Warren-Dearborn, MI MSA, the bank's service delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 101 financial centers with the distribution of the population. The bank has five financial centers in low-income geographies representing 5 percent of its financial centers. Approximately 7.8 percent of the population resides in low-income geographies. The bank has 21 financial centers or 20.8 percent of its financial centers located in moderate-income geographies where 23.1 percent of the population lives.

Examiners also considered the bank's alternative delivery systems, including cash dispensing ATMs, full-service ATMs, telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of alternative delivery systems through income proxies based on customers' residency. In five of six alternative delivery systems platforms, the percentage of customers in low- and moderate-income geographies using the platform were near 70 percent of the percentage of the population in low- and moderate-income geographies.

The bank has 18 financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. The bank has 4 financial centers adjacent to low-income geographies and 14 financial centers adjacent to moderate-income geographies. The adjacent financial centers help improve access to retail banking services to individuals in moderate-income geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened two financial centers and closed thirty-one financial centers or 23 percent of its financial centers. The bank closed four financial centers in low-income geographies, six in moderate-income geographies, and the remaining twenty-one in middle- and upper-income geographies. Despite the closures, financial centers remain accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are generally consistent throughout the assessment area. Financial centers are generally open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Detroit-Warren-Dearborn MI MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	143	11.0	334,876	7.8	5	5.0	8	4.7	0	0.0	4	12.9
Moderate	317	24.4	991,201	23.1	21	20.8	43	25.4	1	50.0	6	19.4
Middle	460	35.4	1,623,238	37.8	35	34.7	58	34.3	0	0.0	11	35.5
Upper	363	27.9	1,345,673	31.3	40	39.6	60	35.5	1	50.0	10	32.3
NA	17	1.3	1,262	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	1,300	100.0	4,296,250	100.0	101	100.0	169	100.0	2	100.0	31	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Detroit-Warren-Dearborn, MI MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 149 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 30 low- and moderate-income individuals and provided 51 financial education and foreclosure prevention workshops for 1,475 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 37 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 31 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Ann Arbor, MI MSA, Grand Rapids-Wyoming, MI MSA, and Lansing-East Lansing, MI MSA is consistent with the High Satisfactory Service Test performance in the state of Michigan.

State of Minnesota

CRA Rating for Minnesota³¹:	Outstanding
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and excellent distribution of loans by borrower income or business revenue size;
- Relatively high level of CD lending that has a significantly positive effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Reasonably accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Minnesota

The state of Minnesota is Bank of America's 44th largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$88 million or less than 1 percent of its total domestic deposits in financial centers within the state of Minnesota. Of the 371 depository financial institutions operating in the state, Bank of America, with a deposit market share of less than 1 percent, is the 72nd largest. The two dominant financial institutions with significant market shares include Wells Fargo Bank, N.A. (39.3 percent) and U.S. Bank, N.A. (27.5 percent). No other financial institution has more than 3 percent market share of deposits. As of December 31, 2016, the bank operated 4 financial centers and 27 ATMs in the state of Minnesota.

Refer to the community profiles for the state of Minnesota in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Minnesota

The bank has defined the Minneapolis-St. Paul-Bloomington, MN MSA as its sole assessment area in the state of Minnesota. During the evaluation period, Bank of America originated or

³¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

purchased 8,873 home mortgage loans totaling \$1.9 billion, 5,827 small loans to businesses totaling \$178.5 million, 61 small loans to farms totaling \$533,000, and 18 CD loans totaling \$77.2 million. Based on loan volume, examiners weighted home mortgage loans, representing 60 percent of the volume, the most followed by small loans to businesses at 39.6 percent, and small loans to farms at less than 1 percent.

Examiners contacted one local housing agency. According to the contact, affordable housing is a primary need in the community. While affordable housing organizations have been effective in placing individuals and families in public housing, there remains a waiting list of 2,500 individuals.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MINNESOTA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Minnesota is rated Outstanding, based on excellent lending activity, good geographic distribution, excellent borrower income distribution, and a relatively high level of CD lending that has a significantly positive effect on the Lending Test rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Minnesota is excellent. Lending activity is excellent in the Minneapolis-St. Paul-Bloomington, MN MSA.

Minneapolis-St. Paul-Bloomington, MN MSA

Lending activity in the Minneapolis-St. Paul-Bloomington, MN MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of less than 1 percent. The bank ranks 72nd among 146 depository financial institutions, which places it in the 50th percentile of institutions. According to peer mortgage data for 2016, the bank has a market share of 0.5 percent based on the number of home mortgage loans originated or purchased. The bank ranks 44th among 701 home mortgage lenders, placing it in the top 7 percent of lenders. According to peer small business data for 2016, the bank has a 1.7 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks eighth among 147 small business lenders, which places it in the top 6 percent of lenders. According to peer small farm data for 2016, the bank has a 1.7 percent market share of small loans to farms based on the number of small loans to farms originated or purchased. The bank ranks 11th among 31 farm lenders, which places it in the top 36 percent of lenders. Considering the bank's limited retail banking presence in the MSA and its higher relative rankings for home mortgage loans and small loans to businesses, overall lending activity is excellent.

LENDING VOLUME		Geography: MINNESOTA						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Minneapolis, MN	100.00	8,873	1,851,360	5,827	178,466	61	533	18	77,217	14,779	2,107,576	100.00
MINNESOTA	100.00	8,873	1,851,360	5,827	178,466	61	533	18	77,217	14,779	2,107,576	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is adequate. The distribution is adequate in the Minneapolis-St. Paul-Bloomington, MN MSA.

Minneapolis-St. Paul-Bloomington, MN MSA

The geographic distribution of home mortgage loans in the Minneapolis-St. Paul-Bloomington, MN MSA is adequate. Performance is adequate in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 1.7 percent is lower than the 2.5 percent of owner-occupied housing units in low-income geographies and it is lower than the 2.4 percent for aggregate lenders. The distribution in moderate-income geographies at 10.9 percent is lower than the 14.1 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 12.7 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Minneapolis-St Paul-Bloomington MN-WI MSA	2,777	669,441	100.0	164,387	2.5	1.7	2.4	14.1	10.9	12.7	50.8	46.8	50.7	32.5	40.6	34.3	0.0	0.0	0.0
Total	2,777	669,441	100.0	164,387	2.5	1.7	2.4	14.1	10.9	12.7	50.8	46.8	50.7	32.5	40.6	34.3	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Minneapolis-St. Paul-Bloomington, MN MSA.

Minneapolis-St. Paul-Bloomington, MN MSA

The geographic distribution of small loans to businesses in the Minneapolis-St. Paul-Bloomington, MN MSA is excellent. Performance is excellent in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 4.2 percent is slightly lower than the 4.6 percent of businesses in low-income geographies, but it exceeds the 3.6 percent performance for aggregate lenders. The distribution in moderate-income geographies at 15.3 percent is also slightly lower than the 15.6 percent of businesses in moderate-income geographies, but it exceeds the 13.8 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Minneapolis-St Paul-Bloomington MN-VII MSA	3,507	96,995	100.0	77,551	4.6	4.2	3.6	15.6	15.3	13.8	46.4	47.7	44.1	33.4	32.7	38.5	0.0	0.0	0.0
Total	3,507	96,995	100.0	77,551	4.6	4.2	3.6	15.6	15.3	13.8	46.4	47.7	44.1	33.4	32.7	38.5	0.0	0.0	0.0

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is good. The distribution is good in the Minneapolis-St. Paul-Bloomington, MN MSA.

Minneapolis-St. Paul-Bloomington, MN MSA

The geographic distribution of small loans to farms in the Minneapolis-St. Paul-Bloomington, MN MSA is good. Performance is adequate in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 0 percent is below the 1.1 percent of farms in low-income geographies and it is below the 0.5 percent performance for aggregate lenders. Considering the limited opportunities to make small loans to farms in low-income geographies, performance is adequate. The distribution in moderate-income geographies at 17.1 percent exceeds the 14.5 percent of farms in moderate-income geographies, but it is lower than the 23.7 percent performance for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Minneapolis-St Paul-Bloomington MN-WI MSA	41	346	100.0	876	1.1	0.0	0.5	14.5	17.1	23.7	57.7	58.5	55.8	26.7	24.4	20.0	0.0	0.0	0.0
Total	41	346	100.0	876	1.1	0.0	0.5	14.5	17.1	23.7	57.7	58.5	55.8	26.7	24.4	20.0	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is excellent. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is excellent. The distribution is excellent in the Minneapolis-St. Paul-Bloomington, MN MSA.

Minneapolis-St. Paul-Bloomington, MN MSA

The distribution of home mortgage loans by borrower income in the Minneapolis-St. Paul-Bloomington, MN MSA is excellent. The distribution is good to low-income borrowers and excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 11.7 percent is lower than the 19.2 percent of low-income families in the MSA; however, the bank’s performance exceeds the 8.1 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 20.3 percent exceeds the 17.7 percent of moderate-income families and it exceeds the 19.8 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Minneapolis-St Paul-Bloomington MN-WI MSA	2,777	669,441	100.0	164,387	19.2	11.7	8.1	17.7	20.3	19.8	23.3	18.9	21.8	39.8	40.3	32.8	0.0	8.8	17.7
Total	2,777	669,441	100.0	164,387	19.2	11.7	8.1	17.7	20.3	19.8	23.3	18.9	21.8	39.8	40.3	32.8	0.0	8.8	17.7

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Minneapolis-St. Paul-Bloomington, MN MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 34 percent of its small loans to businesses.

Minneapolis-St. Paul-Bloomington, MN MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Minneapolis-St. Paul-Bloomington, MN MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 50.4 percent is lower than the 79 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is higher than the 46.8 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses w 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
FS Minneapolis-St Paul-Bloomington MN-WI MSA	3,507	96,995	100.0	77,551	79.0	50.4	46.8	6.0	15.2	15.0	34.4
Total	3,507	96,995	100.0	77,551	79.0	50.4	46.8	6.0	15.2	15.0	34.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Minneapolis-St. Paul-Bloomington, MN MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 29 percent of its small loans to farms.

Minneapolis-St. Paul-Bloomington, MN MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Minneapolis-St. Paul-Bloomington, MN MSA is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 61 percent is lower than the 96.8 percent of farms with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 52.1 percent for aggregate lenders, overall performance is good.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Minneapolis-St Paul-Bloomington MN-WI MSA	41	346	100.0	876	96.8	61.0	52.1	1.9	9.8	1.3	29.3
Total	41	346	100.0	876	96.8	61.0	52.1	1.9	9.8	1.3	29.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a significantly positive effect overall on the bank’s Lending Test performance in the state of Minnesota.

Minneapolis-St. Paul-Bloomington, MN MSA

In the Minneapolis-St. Paul-Bloomington, MN MSA, CD lending has a significantly positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated 18 CD loans totaling \$77.2 million that primarily helped provide 381 units of affordable housing. CD lending represents 706.4 percent of the allocated Tier 1 Capital. While the dollar volume of CD loans is significant, it includes very large loans that the bank renewed annually that overstate the actual volume of new funding to the community. Even after considering the dollar effect from these renewed loans, overall CD lending remains high.

Examples of CD loans include:

- The bank provided \$1.5 million in funding, representing its 80 percent share in a LIHTC warehouse line of credit to construct Lily Gables, a 191-unit affordable housing development in Columbia Heights, MN. All units are restricted to incomes at or below 60 percent of the area median income. The bank’s share of the funding helped finance 153 of the units.

- The bank provided \$19.6 million in tax-exempt loans as part of syndicated financing for the rehabilitation of the Pillsbury Mill Plant in Minneapolis, MN. The rehabilitation includes a gut renovation and reconfiguration of the complex with new construction of 251 affordable housing units restricted to artists with incomes up to 60 percent of the area median income. The bank's 33 percent share of the syndicated financing helped to finance 83 of the units. The bank renewed this loan three times, which has the effect of overstating total CD lending by nearly \$40 million.
- The bank provided \$1.2 million as part of its \$3 million commitment toward a multibank credit facility for the Corporation for Supportive Housing (CSH). CSH provides acquisition, predevelopment, and construction funding for projects that include supportive housing targeted to very low-income tenants. This transaction represents the portion of funding benefitting the Minneapolis-St. Paul-Bloomington, MN MSA.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Minnesota, lending under the MHA and HARP programs accounted for 93 percent of the dollar volume of all loans under flexible lending programs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Minnesota is rated Outstanding. Investment performance is excellent in the Minneapolis-St. Paul-Bloomington, MN MSA.

Minneapolis-St. Paul-Bloomington, MN MSA

In the Minneapolis-St. Paul-Bloomington, MN MSA, Bank of America has an excellent level of community development investments. The bank made 44 CD investments during the current evaluation period totaling \$7.7 million. Approximately \$6.8 million or 88 percent of the current period investment dollars supported 512 units of affordable housing. In addition, the bank has 30 CD investments totaling \$2.3 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$10 million or 90.5 percent of allocated Tier 1 Capital. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$6 million or 80 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$1.5 million in a fund that acquires direct and indirect interests in partnerships that own affordable housing developments throughout the U.S. Financing for these housing developments include LIHTCs. This transaction represents funding applied toward Central Avenue Lofts in Minneapolis, MN, which provides 53 units of affordable housing.
- The bank invested \$3.2 million in a Section 42 LIHTC used to fund affordable housing developments in the U.S. This transaction represents Carleton Place Lofts, a 169-unit affordable housing development in St. Paul, MN. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$200,000 in grants to the City of Lakes Community Land Trust (CLCLT), which helps provide affordable home ownership for low- and moderate-income individuals and families throughout Minneapolis, MN. The grants were part of a two-year \$2 million commitment to the CLCLT. According to CLCLT, 100 percent of the households served earn less than 80 percent of the area median income.

QUALIFIED INVESTMENTS		Geography: MINNESOTA				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Minneapolis, MN	30	2,253	44	7,715	74	9,968	73.11	0	0
MINNESOTA - Statewide	0	0	20	124	20	124	0.91	0	0
MINNESOTA - Non Assessed	17	2,257	4	1,286	21	3,543	25.98	0	0
MINNESOTA	47	4,510	68	9,125	115	13,635	100.00	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 bank's financial reporting system.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Minnesota is rated Low Satisfactory. Service Test performance is adequate in the Minneapolis-St. Paul-Bloomington, MN MSA.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Minneapolis-St. Paul-Bloomington, MN MSA

In the Minneapolis-St. Paul-Bloomington, MN MSA, the bank’s service delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank has a very limited retail banking presence in the MSA. Examiners based this conclusion on a comparison of the distribution of the bank’s four financial centers with the distribution of the population. The bank has no financial centers in low- and moderate-income geographies where 6.3 percent and 17.1 percent of the population lives, respectively.

Examiners also considered the bank’s alternative delivery systems, including cash dispensing ATMs, full-service ATMs, telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems had no effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies.

The bank has one financial center in an upper-income census tract that is adjacent to or in very close proximity to a moderate-income census tract. The adjacent financial center helps improve access to retail banking services to individuals in moderate-income geographies.

The opening and closing of branches generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened all four of its financial centers. While the bank reports one financial center as a closure, it is actually a relocation from one floor to another floor within the same building. Considering the limited number of financial centers and their placement in middle- and upper-income geographies where most of the population resides, service delivery systems are adequate.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are generally consistent throughout the assessment area. Financial centers are generally open 9:00 am to 5:00 pm Monday through Friday and 9:00 am to 1:00 pm on Saturday. One financial center in a middle-income geography is not open for Saturday banking.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Minneapolis-St Paul-Bloomington MN-WI MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	63	8.2	204,255	6.3	0	0.0	2	7.4	0	0.0	0	0.0
Moderate	152	19.8	550,335	17.1	0	0.0	3	11.1	0	0.0	0	0.0
Middle	341	44.5	1,525,745	47.3	2	50.0	10	37.0	2	50.0	1	100.0
Upper	207	27.0	939,347	29.1	2	50.0	12	44.4	2	50.0	0	0.0
NA	4	0.5	3,813	0.1	0	0.0	0	0.0	0	0.0	0	0.0
Totals	767	100.0	3,223,495	100.0	4	100.0	27	100.0	4	100.0	1	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Minneapolis-St. Paul-Bloomington, MN MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 48 community development services targeted to low- and moderate-income individuals. Employees provided 1 financial education workshop and 21 foreclosure prevention workshops for 202 individuals. Employees participated in 22 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, four employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

State of Missouri

CRA Rating for Missouri³²:	Satisfactory
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Adequate distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Low level of CD lending that has a negative effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Missouri

The state of Missouri is Bank of America's 41st largest rating area based on its total deposits in the state when excluding deposits in the Kansas City, MO-KS Multistate MSA and St. Louis, MO-IL Multistate MSA. Examiners excluded the multistate MSAs from the analysis of the state of Missouri because examiners evaluated the multistate MSAs as separate rating areas. As of June 30, 2016, the bank maintained approximately \$704 million or 0.1 percent of its total domestic deposits in financial centers in areas of the state that do not include the multistate MSAs. Of the 235 depository financial institutions operating in areas of the state of Missouri that do not include the multistate MSAs, Bank of America, with a deposit market share of 1.4 percent, is the 17th largest. The bank's primary banking competitors for deposits with deposit shares greater than 5 percent in the areas of Missouri that exclude the multistate MSAs include U.S. Bank, N.A. (6.1 percent), and Commerce Bank (6 percent). As of December 31, 2016, BANA operated 8 financial centers and 21 full-service ATMs in the areas of the state of Missouri that exclude the multistate MSAs.

Refer to the community profiles for the state of Missouri in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

³² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in Missouri

Examiners selected the Springfield, MO MSA for a full-scope review and the Columbia, MO MSA and Missouri Non-MSA for limited-scope reviews. While the Springfield, MO MSA carries approximately 60 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in Missouri, the conclusions and ratings for the state are based on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 2,914 home mortgage loans totaling \$346.4 million, 2,888 small loans to businesses totaling \$73.8 million, 58 small loans to farms totaling \$465,000, and one CD loan totaling \$294,000. Based on loan volume, examiners weighted small loans to businesses, representing 50 percent of the volume, the most followed by home mortgage loans at 49 percent, and small loans to farms at 1 percent.

Examiners participated in a forum of 20 individuals representing local government agencies and community organizations. The individuals conveyed a number of needs within the communities including better access to small dollar loans. A large segment of the population, particularly low- and moderate-income, is unbanked and relies on payday loans at interest rates exceeding 400 percent on average to make ends meet. The biggest housing issue in the Springfield, MO MSA is the level of substandard housing. The housing stock in the Springfield, MO MSA is very old and there is a need for home improvement loans. Although home foreclosures are not as high as pre-recession levels, the west side and west central neighborhoods still struggle with high foreclosures.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Missouri is rated High Satisfactory, based on excellent lending activity, good geographic distribution, and good borrower income distribution. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Missouri is excellent. Lending activity is excellent in the Springfield, MO MSA.

Springfield, MO MSA

Lending activity in the Springfield, MO MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 4.7 percent. The bank ranks fifth among 39 depository financial institutions in the assessment area, which places it in the top 13 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.1 percent based on the number of home mortgage loans originated or

purchased. The bank ranks 24th among 317 home mortgage lenders, which places it in the top 8 percent of lenders. According to peer small business data for 2016, the bank has a 1.6 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks sixth among 83 small business lenders, which places it in the top 8 percent of lenders. According to peer small farm data for 2016, the bank has a 0.1 percent market share of small loans to farms based on the number of small loans to farms originated or purchased. The bank ranks 10th among 19 farm lenders, which places it in the bottom 47 percent of lenders. Considering the bank’s higher ranking for home mortgage and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: MISSOURI						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Springfield, MO	65.89	1,962	228,889	1,863	54,391	37	303	0	0	3,862	283,583	60.01
Limited Review												
Columbia, MO	22.06	631	80,739	650	10,958	12	104	0	0	1,293	91,801	39.99
Missouri Non-MSA	12.05	321	36,809	375	8,479	9	58	1	294	706	45,640	0.00
MISSOURI	100.00	2,914	-	2,888	73,828	58	465	1	294	5,861	421,024	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects adequate penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is excellent. The distribution is excellent in the Springfield, MO MSA.

Springfield, MO MSA

The geographic distribution of home mortgage loans in the Springfield, MO MSA is excellent. Performance is excellent in low-income geographies and good in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 1 percent is higher than the 0.5 percent of owner-occupied housing units in low-income geographies and it is higher than the 0.5 percent for aggregate lenders. The distribution in moderate-income

geographies at 13.3 percent is lower than the 16 percent of owner-occupied housing units in moderate-income geographies, but is higher than the 11.2 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Springfield MO MSA	805	96,424	74.4	18,441	0.5	1.0	0.5	16.0	13.3	11.2	61.2	58.3	62.4	22.4	27.5	25.9	0.0	0.0	0.0
LS Columbia MO MSA	237	31,555	21.9	5,969	2.0	2.5	1.7	14.9	19.0	15.0	50.2	48.5	49.8	32.9	30.0	33.4	0.0	0.0	0.0
LS Missouri Non-MSA	40	3,341	3.7	1,466	0.0	0.0	0.0	14.1	17.5	14.5	67.6	70.0	62.3	18.3	12.5	23.2	0.0	0.0	0.0
Total	1,082	131,320	100.0	25,876	0.7	1.3	0.7	15.5	14.7	12.3	59.7	56.6	59.5	24.1	27.4	27.5	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is adequate. The distribution is adequate in the Springfield, MO MSA.

Springfield, MO MSA

The geographic distribution of small loans to businesses in the Springfield, MO MSA is adequate. Performance is adequate in low-income geographies and adequate in moderate-income geographies. The distribution in low-income geographies at 0.3 percent is lower than the 0.8 percent of businesses in low-income geographies and it is slightly lower than the 0.4 percent performance for aggregate lenders. The distribution in moderate-income geographies at 20.4 percent is lower than the 24.3 percent of businesses in moderate-income geographies and it is lower than the 24.3 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Springfield MO MSA	1,113	29,196	67.4	7,344	0.8	0.3	0.4	24.3	20.4	24.3	55.2	53.6	52.7	19.7	25.8	22.6	0.0	0.0	0.0
LS Columbia MO MSA	401	7,019	24.3	2,843	16.6	11.5	15.2	18.0	16.7	15.8	36.1	35.7	37.5	29.3	36.2	31.6	0.0	0.0	0.0
LS Missouri Non-MSA	137	4,486	8.3	1,109	0.0	0.0	0.0	28.1	21.9	22.9	59.2	65.0	64.0	12.7	13.1	13.1	0.0	0.0	0.0
Total	1,651	40,701	100.0	11,296	4.6	2.9	4.1	23.2	19.6	22.0	51.0	50.2	50.0	21.2	27.3	23.9	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is poor. The distribution is poor in the Springfield, MO MSA.

Springfield, MO MSA

The geographic distribution of small loans to farms in the Springfield, MO MSA is poor. Performance is poor in low-income geographies and poor in moderate-income geographies. The distribution in low-income geographies at 0 percent is lower than the 0.2 percent of farms in low-income geographies, but it is consistent with the 0 percent performance for aggregate lenders. The distribution in moderate-income geographies at 0 percent is lower than the 10.6 percent of farms in moderate-income geographies and it is lower than the 8.9 percent performance for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS Springfield MO MSA	21	175	65.6	662	0.2	0.0	0.0	10.6	0.0	8.9	75.9	85.7	85.8	13.2	23.1	5.3	0.0	0.0	0.0
LS Columbia MO MSA	7	51	33.3	115	1.7	0.0	1.7	14.9	40.0	15.7	64.4	85.7	73.0	18.9	0.0	9.6	0.0	0.0	0.0
LS Missouri Non-MSA	3	17	15.0	163	0.0	0.0	0.0	12.8	0.0	15.3	75.0	100.0	76.7	12.3	0.0	8.0	0.0	0.0	0.0
Total	32	254	100.0	940	0.5	0.0	0.2	11.9	8.7	10.9	73.2	84.4	82.7	14.4	15.0	6.3	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is excellent. The distribution is excellent in the Springfield, MO MSA.

Springfield, MO MSA

The distribution of home mortgage loans by borrower income in the Springfield, MO MSA is excellent. The distribution is good to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 13.8 percent is lower than the 19.5 percent of low-income families in the MSA; however, the bank’s performance is significantly higher than the 4.6 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 18.8 percent exceeds the 18.4 percent of moderate-income families and it exceeds the 15.3 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Springfield MO MSA	805	96,424	74.4	18,441	19.5	13.8	4.6	18.4	18.8	15.3	22.1	22.6	18.6	40.0	36.9	36.3	0.0	8.0	25.3
LS Columbia MO MSA	237	31,555	21.9	5,969	21.0	19.8	6.9	17.1	17.3	18.1	22.3	19.4	20.6	39.5	35.0	37.1	0.0	8.4	17.3
LS Missouri Non-MSA	40	3,341	5.4	1,466	21.3	15.0	6.1	16.8	17.5	14.7	21.6	12.5	20.2	40.3	42.5	39.9	0.0	12.5	19.1
Total	1,082	131,320	100.0	25,876	20.0	15.2	5.3	17.9	18.4	15.9	22.1	21.5	19.1	39.9	36.7	36.6	0.0	8.2	23.1

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Springfield, MO MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 36 percent of its small loans to businesses.

Springfield, MO MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Springfield, MO MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 53.3 percent is lower than the 77.1 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 48.3 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Springfield MO MSA	1,113	29,196	67.4	7,344	77.1	53.3	48.3	5.5	10.7	17.5	36.0
LS Columbia MO MSA	401	7,019	24.3	2,843	75.5	54.1	48.2	4.8	10.2	19.7	35.7
LS Missouri Non-MSA	137	4,486	9.8	1,109	76.0	52.6	49.9	4.4	11.7	19.7	35.8
Total	1,651	40,701	100.0	11,296	76.6	53.4	48.4	5.2	10.7	18.3	35.9

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate overall. The distribution is adequate in the Springfield, MO MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 38 percent of its small loans to farms.

Springfield, MO MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Springfield, MO MSA is adequate. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 61.9 percent is lower than the 98.9 percent of farms with gross annual revenues of \$1 million or less. Considering the bank’s distribution is also weaker than the 78.7 percent for aggregate lenders, overall performance is adequate.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Springfield MO MSA	21	175	73.9	662	98.9	61.9	78.7	0.3	0.0	0.7	47.1
LS Columbia MO MSA	8	62	33.3	115	97.3	100.0	73.9	0.9	0.0	1.8	100.0
LS Missouri Non-MSA	3	17	15.0	163	99.4	0.0	82.8	0.0	0.0	0.6	100.0
Total	32	254	100.0	940	98.6	62.5	78.8	0.4	0.0	1.0	37.5

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a negative effect overall on the bank’s Lending Test performance in the state of Missouri. To help assess the bank’s capacity to lend, examiners compared the dollar volume of CD loans with the dollar volume of the bank’s net Tier 1 Capital allocated to the assessment area according to the assessment area’s proportion of deposits.

Springfield, MO MSA

In the Springfield, MO MSA, CD lending has a negative effect on the lending performance in the assessment area. During the evaluation period, the bank did not originate any CD loans

within the assessment area. Based on the bank's size and financial capacity in the assessment area, the lack of CD lending has a negative effect on overall lending performance.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Missouri, lending under the MHA and HARP programs accounted for 79 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Columbia, MO MSA is consistent with the High Satisfactory Lending Test performance in the state of Missouri. Performance in the Missouri Non-MSA is stronger than the High Satisfactory Lending Test performance in the state of Missouri primarily due to a higher level of CD lending that has a significantly positive effect on lending performance in the assessment area.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Missouri is rated Outstanding. Investment performance is excellent in the Springfield, MO MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Springfield, MO MSA

In the Springfield, MO MSA, Bank of America has an excellent level of CD investments. The bank made 23 CD investments during the current evaluation period totaling \$4.8 million. Approximately \$4.7 million or 99 percent of the current period investment dollars supported 69 units of affordable housing. In addition, the bank has 23 CD investments totaling \$2.7 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$7.5 million or 14.1 percent of allocated Tier 1 Capital. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$2.6 million or 56 percent of the investment dollars.

Examples of community development investments include:

- The bank provided \$9,500 in grants to the Curators of the University of Missouri for the Missouri College Advising Corps (MCAC). The MCAC’s mission is to empower Missouri students to go to college and succeed. MCAC hires and places recent college graduates as full-time near-peer college advisors in high schools that have college-going rates below the statewide average and have high proportions of low-income first-generation-college and underrepresented students. A majority of the high schools to receive programming through this grant have at least 52 percent of students eligible for free or reduced-price lunches.
- The bank provided a \$15,000 grant to the Foundation for Springfield Public Schools to support the Middle School Achievement program, which is designed to motivate and encourage students of the pre-teen age group to plan for their futures. The program is for students attending one of ten middle schools where a majority of students are eligible for free or reduced-price lunches.
- The bank provided two grants totaling \$15,000 to Habitat for Humanity to support the rehabilitation of a three-bedroom home for a low- or moderate-income family.

QUALIFIED INVESTMENTS		Geography: MISSOURI				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Springfield, MO	23	2,707	23	4,750	46	7,456	27.55	0	0
Limited Review									
Columbia, MO	7	1,197	20	2,516	27	3,713	13.72	0	0
Missouri Non-MSA	0	0	17	1,448	17	1,448	5.35	0	0
MISSOURI - Statewide	1	2	12	76	13	78	0.29	0	0
MISSOURI - Non Assessed	57	3,970	54	10,403	111	14,373	53.10	0	0
MISSOURI	88	7,876	126	19,193	214	27,069	100.00	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 bank's financial reporting system.									

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Columbia, MO MSA and Missouri Non-MSA is consistent with the Outstanding Investment Test performance in the state of Missouri.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Missouri is rated High Satisfactory. Service Test performance is good in the Springfield, MO MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Springfield, MO MSA

In the Springfield, MO MSA, the bank's service delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's five financial centers with the distribution of the population. The bank has no financial centers in low-income geographies where only 2.3 percent of the population lives. The bank has two financial centers or 40 percent of its financial centers located in moderate-income geographies where 18.2 percent of the population lives.

Examiners also considered the bank's alternative delivery systems, including cash dispensing ATMs, full-service ATMs, telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customers' residency. The percentages of customers in low- and moderate-income geographies using full-service ATMs and text banking exceeded the percentage of the population in low- and moderate-income geographies.

The bank has two financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to moderate-income census tracts. The adjacent financial centers help improve access to retail banking services to individuals in moderate-income geographies.

Financial center openings and closings did adversely affect the accessibility of retail banking services, particularly in moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank closed two financial centers in moderate-income geographies. Due to the already limited retail banking presence in moderate-income geographies, the closures adversely affected the accessibility of retail banking services.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are consistent throughout the assessment area. All financial centers are open 9:00 am to 5:00 pm Monday through Friday and 9:00 am to 12:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Springfield MO MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	3	3.3	10,070	2.3	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	22	24.2	79,603	18.2	2	40.0	4	33.3	0	0.0	2	100.0
Middle	50	54.9	260,498	59.6	2	40.0	6	50.0	0	0.0	0	0.0
Upper	16	17.6	86,541	19.8	1	20.0	2	16.7	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	91	100.0	436,712	100.0	5	100.0	12	100.0	0	100.0	2	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Springfield, MO MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 42 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 2 low- and moderate-income individuals and provided 19 financial education workshops for 309 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 12 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, nine employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Columbia, MO MSA is stronger than the High Satisfactory Service Test performance in the state of Missouri due to the stronger distribution of financial centers, particularly in low- and moderate-income geographies. Performance in the Missouri Non-MSA is weaker than the overall High Satisfactory Service Test performance in the state of Missouri. Performance is weaker primarily due to the lack of retail banking presence in the assessment area. Service delivery systems are limited to two ATMs and other alternative delivery systems.

State of Nevada

CRA Rating for Nevada³³:	Satisfactory
The Lending Test is rated:	<u>High Satisfactory</u>
The Investment Test is rated:	<u>Low Satisfactory</u>
The Service Test is rated:	<u>Outstanding</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Adequate level of CD lending that has a neutral effect on overall lending performance;
- Adequate level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Nevada

The state of Nevada is Bank of America's 16th largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$15.3 billion or 1.2 percent of its total domestic deposits in financial centers in the state of Nevada. Of the 44 depository financial institutions operating in the state, Bank of America, with a deposit market share of 7.5 percent, is the third largest. The bank's primary banking competitors for deposits in Nevada with deposit market shares greater than 5 percent include Charles Schwab Bank (67.2 percent) and Wells Fargo Bank (9 percent). As of December 31, 2016, BANA operated 67 financial centers and 253 full-service ATMs in the state of Nevada.

Examiners used the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Las Vegas-Henderson-Paradise, NV MSA, Bank of America reported an additional \$562.5 million in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

³³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the community profiles for the state of Nevada in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Nevada

Examiners selected the Las Vegas-Henderson-Paradise, NV MSA and Reno, NV MSA for full-scope reviews and the Carson City, NV MSA and Nevada Non-MSA for limited-scope reviews. While the Las Vegas-Henderson-Paradise, NV MSA carries approximately 86 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in Nevada, examiners based the conclusions and ratings for the state on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 22,471 home mortgage loans totaling \$4.6 billion, 26,413 small loans to businesses totaling \$765.6 million, 111 small loans to farms totaling \$2 million, and 23 CD loans totaling \$65.5 million. Based on loan volume, examiners weighted small loans to businesses, representing 54 percent of the volume, the most followed by home mortgage loans at 46 percent, and small loans to farms at less than 1 percent.

Examiners interviewed four community development organizations in the full-scope assessment areas. The contacts identified the following needs: affordable housing, housing for homeless individuals and families, micro loans for small businesses, and short-term loans for military personnel.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEVADA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Nevada is rated High Satisfactory, based on excellent lending activity, good geographic distribution, and good borrower income distribution. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Nevada is excellent. Lending activity is excellent in the Las Vegas-Henderson-Paradise, NV MSA and excellent in the Reno, NV MSA.

Las Vegas-Henderson-Paradise, NV MSA

Lending activity in the Las Vegas-Henderson-Paradise, NV MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 24.7 percent. The bank ranks first among 35 depository financial institutions in the assessment area, which places it in the top 3 percent of institutions. According to peer mortgage data for 2016, the

bank has a market share of 2 percent based on the number of home mortgage loans originated or purchased. The bank ranks eighth among 448 home mortgage lenders, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has a 9.8 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks third among 138 small business lenders, which places it in the top 3 percent of lenders. According to peer farm data for 2016, the bank has a 7 percent market share based on the number of small loans to farms originated or purchased. The bank ranks fourth among 11 farm lenders, which places it in the top 37 percent of lenders. Considering the bank's higher ranking for home mortgage and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

Reno, NV MSA

Lending activity in the Reno, NV MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 1.1 percent. The bank ranks third among 16 depository financial institutions, which places it in the top 19 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.6 percent based on the number of home mortgage loans originated or purchased. The bank ranks sixth among 283 home mortgage lenders, which places it in the top 3 percent of lenders. According to peer small business data for 2016, the bank has a 7.6 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fourth among 88 small business lenders, which places it in the top 5 percent of lenders. According to peer farm data for 2016, the bank has a market share of 16.7 percent based on the number of small loans to farms originated or purchased. The bank ranks third among seven farm lenders, which places it in the top 43 percent of lenders. Considering the bank's higher ranking for home mortgage and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: NEVADA						Evaluation Period: January 1, 2012 to December 31, 2016					
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)		
Full Review													
Las Vegas, NV	71.42	16,345	3,264,129	18,617	528,051	29	312	20	62,094	35,011	3,854,586	86.24	
Reno, NV	19.59	4,226	953,622	5,340	161,962	34	231	1	1,138	9,601	1,116,953	10.31	
Limited Review													
Carson City, NV	2.17	422	78,083	633	25,329	6	123	1	298	1,062	103,833	1.01	
Nevada Non-MSA	6.82	1,478	280,447	1,823	50,279	42	1,335	1	1,938	3,344	333,999	2.43	
NEVADA	100.00	22,471	4,576,281	26,413	765,621	111	2,001	23	65,467	49,018	5,409,370	100.00	

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is adequate. The distribution is adequate in the Las Vegas-Henderson-Paradise, NV MSA and good in the Reno, NV MSA.

Las Vegas-Henderson-Paradise, NV MSA

The geographic distribution of home mortgage loans in the Las Vegas-Henderson-Paradise, NV MSA is adequate. Performance is adequate in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 0.9 percent is lower than the 1.7 percent of owner-occupied housing units in low-income geographies, but is consistent with the 0.9 percent for aggregate lenders. The distribution in moderate-income geographies at 8.3 percent is lower than the 15.5 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 9 percent for aggregate lenders.

Reno, NV MSA

The geographic distribution of home mortgage loans in the Reno, NV MSA is good. Performance is good in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 2.1 percent is lower than the 3.5 percent of owner-occupied housing units in low-income geographies, but is higher than the 1.8 percent for aggregate lenders. The distribution in moderate-income geographies at 10.8 percent is lower than the 15.4 percent of owner-occupied housing units in moderate-income geographies and it is slightly lower than the 11 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Las Vegas-Henderson-Paradise NV MSA	5,256	1,133,189	71.6	93,034	1.7	0.9	0.9	15.5	8.3	9.0	45.7	43.6	45.1	37.1	47.2	45.0	0.0	0.0	0.0
FS Reno NV MSA	1,557	402,549	21.2	22,424	3.5	2.1	1.8	15.4	10.8	11.0	37.8	36.4	39.6	43.3	50.6	47.5	0.0	0.1	0.0
LS Carson City NV MSA	150	30,787	2.0	1,950	0.0	0.0	0.0	17.0	12.0	15.1	71.8	77.3	76.8	11.2	10.7	8.1	0.0	0.0	0.0
LS Nevada Non-MSA	381	94,111	5.2	6,618	0.0	0.0	0.0	33.7	19.7	24.6	50.0	54.1	60.5	16.3	26.2	14.9	0.0	0.0	0.0
Total	7,344	1,660,636	100.0	124,026	1.9	1.1	1.0	16.9	9.5	10.3	45.2	43.3	45.5	36.1	46.1	43.3	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The distribution is good in the Las Vegas-Henderson-Paradise, NV MSA and good in the Reno, NV MSA.

Las Vegas-Henderson-Paradise, NV MSA

The geographic distribution of small loans to businesses in the Las Vegas-Henderson-Paradise, NV MSA is good. Performance is adequate in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 2.9 percent is lower than the 5 percent of businesses in low-income geographies, but it is consistent with the 2.9 percent performance for aggregate lenders. The distribution in moderate-income geographies at 17.9 percent is lower than the 21.1 percent of businesses in moderate-income geographies, but it exceeds the 16.3 percent performance for aggregate lenders.

Reno, NV MSA

The geographic distribution of small loans to businesses in the Reno, NV MSA is good. Performance is good in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 8.8 percent is lower than the 10.6 percent of businesses in low-income geographies, but it exceeds the 6.3 percent performance for aggregate lenders. The distribution in moderate-income geographies at 25.7 percent is lower than the 28.8 percent of businesses in moderate-income geographies, but it exceeds the 22.3 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Las Vegas-Henderson-Paradise NV MSA	12,555	324,888	73.1	47,832	5.0	2.9	2.9	21.1	17.9	16.3	42.3	44.6	42.0	31.6	34.6	38.9	0.0	0.0	0.0
FS Reno NV MSA	3,370	96,101	19.6	15,253	10.6	8.8	6.3	28.8	25.7	22.3	22.2	21.1	22.9	33.4	40.4	45.7	5.0	4.0	2.8
LS Carson City NV MSA	382	13,007	2.2	2,266	0.0	0.0	0.0	11.8	13.6	12.2	81.2	79.3	76.5	7.1	7.1	11.3	0.0	0.0	0.0
LS Nevada Non-MSA	872	22,615	5.1	4,498	0.0	0.0	0.0	25.9	20.5	18.0	51.7	45.1	52.0	22.3	34.4	30.0	0.1	0.0	0.0
Total	17,179	456,611	100.0	69,849	5.6	3.9	3.4	22.5	19.4	17.6	40.4	40.8	39.6	30.6	35.1	38.9	0.9	0.8	0.6

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is good. The distribution is good in the Las Vegas-Henderson-Paradise, NV MSA and adequate in the Reno, NV MSA.

Las Vegas-Henderson-Paradise, NV MSA

The geographic distribution of small loans to farms in the Las Vegas-Henderson-Paradise, NV MSA is good. Performance is poor in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 0 percent is lower than the 2.2 percent of farms in low-income geographies, but it is consistent with the 0 percent performance for aggregate lenders. The distribution in moderate-income geographies at 33.3 percent is higher than the 18.2 percent of farms in moderate-income geographies and it exceeds the 10.7 percent performance for aggregate lenders.

Reno, NV MSA

The geographic distribution of small loans to farms in the Reno, NV MSA is adequate. Performance is poor in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 0 percent is lower than the 6.4 percent of farms in low-income geographies and it is lower than the 3.7 percent performance for aggregate lenders. The distribution in moderate-income geographies at 12.5 percent is lower than the 20.3 percent of farms in moderate-income geographies, but it exceeds the 11.1 percent performance for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Las Vegas-Henderson-Paradise NV MSA	14	140	27.3	56	2.2	0.0	0.0	18.2	33.3	10.7	44.5	35.7	50.0	35.1	42.9	39.3	0.0	0.0	0.0
FS Reno NV MSA	24	189	41.4	27	6.4	0.0	3.7	20.3	12.5	11.1	30.9	45.8	37.0	40.7	41.7	40.7	1.8	0.0	7.4
LS Carson City NV MSA	4	117	15.8	6	0.0	0.0	0.0	11.3	50.0	16.7	83.8	66.7	83.3	4.9	0.0	0.0	0.0	0.0	0.0
LS Nevada Non-MSA	16	302	32.0	38	0.0	0.0	0.0	25.1	50.0	13.2	48.7	12.5	52.6	26.1	58.3	34.2	0.1	0.0	0.0
Total	58	748	100.0	127	2.7	0.0	0.8	19.5	27.6	11.8	43.5	32.8	49.6	34.0	39.7	36.2	0.4	0.0	1.6

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the "Inside/Outside Ratio" section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Las Vegas-Henderson-Paradise, NV MSA and good in the Reno, NV MSA.

Las Vegas-Henderson-Paradise, NV MSA

The distribution of home mortgage loans by borrower income in the Las Vegas-Henderson-Paradise, NV MSA is good. The distribution is adequate to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 7.4 percent is lower than the 20.1 percent of low-income families in the MSA; however, the bank's performance is higher than the 3.7 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 18.3 percent exceeds the 18 percent of moderate-income families and it exceeds the 14.1 percent performance for aggregate lenders.

Reno, NV MSA

The distribution of home mortgage loans by borrower income in the Reno, NV MSA is good. The distribution is adequate to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 6.1 percent is lower than the 20.9 percent of low-income families in the MSA; however, the bank's performance is higher than the 3.9 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 16.3 percent is slightly below the 17.8 percent of moderate-income families and it exceeds the 14.1 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Las Vegas-Henderson-Paradise NV MSA	5,256	1,133,189	71.6	93,034	20.1	7.4	3.7	18.0	18.3	14.1	22.0	22.0	19.6	39.9	43.0	37.2	0.0	9.4	25.4
FS Reno NV MSA	1,557	402,549	21.2	22,424	20.9	6.1	3.9	17.8	16.3	14.1	20.6	19.6	22.6	40.7	50.9	42.1	0.0	7.1	17.4
LS Carson City NV MSA	150	30,787	2.0	1,950	22.3	13.3	6.2	17.3	22.0	18.6	19.8	23.3	22.8	40.7	33.3	34.8	0.0	8.0	17.7
LS Nevada Non-MSA	381	94,111	5.2	6,618	22.5	12.1	4.7	19.4	15.7	14.5	22.7	18.9	21.4	35.5	43.6	36.5	0.0	9.7	22.9
Total	7,344	1,660,636	100.0	124,026	20.4	7.5	3.8	18.0	17.8	14.2	21.8	21.4	20.3	39.8	44.5	38.0	0.0	8.9	23.7

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Las Vegas-Henderson-Paradise, NV MSA and good in the Reno, NV MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 31 percent of its small loans to businesses.

Las Vegas-Henderson-Paradise, NV MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Las Vegas-Henderson-Paradise, NV MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 59.7 percent is lower than the 76.4 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 45.4 percent for aggregate lenders, overall performance is good.

Reno, NV MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Reno, NV MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 54.4 percent is lower than the 75.6 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 40.9 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Las Vegas-Henderson-Paradise NV MSA	12,555	324,888	73.1	47,832	76.4	59.7	45.4	5.4	11.2	18.2	29.1
FS Reno NV MSA	3,370	96,101	19.6	15,253	75.6	54.4	40.9	6.5	12.0	18.0	33.6
LS Carson City NV MSA	382	13,007	2.2	2,266	72.7	53.9	38.0	5.9	15.7	21.5	30.4
LS Nevada Non-MSA	872	22,615	5.1	4,498	79.7	53.7	40.7	4.1	7.6	16.2	38.8
Total	17,179	456,611	100.0	69,849	76.3	58.2	43.9	5.6	11.3	18.2	30.5

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Las Vegas-Henderson-Paradise, NV MSA and good in the Reno, NV MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 41 percent of its small loans to farms.

Las Vegas-Henderson-Paradise, NV MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Las Vegas-Henderson-Paradise, NV MSA is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 78.6 percent is lower than the 91.9 percent of farms with gross annual revenues of \$1 million or less. Considering the bank’s distribution exceeds the 50 percent for aggregate lenders, overall performance is good.

Reno, NV MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Reno, NV MSA is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 58.3 percent is lower than the 94.3 percent of farms with gross annual revenues of \$1 million or less. Considering the bank’s distribution exceeds the 48.1 percent for aggregate lenders, overall performance is good.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Las Vegas-Henderson-Paradise NV MSA	14	140	24.1	56	91.9	78.6	50.0	5.5	0.0	2.6	21.4
FS Reno NV MSA	24	189	41.4	27	94.3	58.3	48.1	4.1	14.3	1.6	37.5
LS Carson City NV MSA	4	117	15.8	6	98.8	0.0	66.7	1.2	33.3	0.0	75.0
LS Nevada Non-MSA	16	302	32.0	38	92.7	50.0	55.3	5.4	12.5	1.8	56.3
Total	58	748	100.0	127	92.8	53.4	52.0	5.1	6.8	2.2	41.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect overall on the bank’s Lending Test performance in the state of Nevada.

Las Vegas-Henderson-Paradise, NV MSA

In the Las Vegas-Henderson-Paradise, NV MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated 20 CD loans totaling \$62.1 million that helped provide 265 units of affordable housing and promote economic development by financing small businesses. CD lending represents 3.9 percent of the allocated Tier 1 Capital. Approximately 75 percent of the CD loans were SBA 504 loans to small businesses to promote economic development activity. The bank met the community’s credit needs primarily through retail lending.

Reno, NV MSA

In the Reno, NV MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated one CD loan totaling \$1.1 million to a small business to promote economic development activity. CD lending represents 0.6 percent of the allocated Tier 1 Capital. The bank met the community’s credit needs primarily through retail lending.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Nevada, lending under the MHA and HARP programs accounted for 84 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Carson City, NV MSA and Nevada Non-MSA is consistent with the High Satisfactory Lending Test performance in the state of Nevada.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Nevada is rated Low Satisfactory. Investment performance is excellent in the Las Vegas-Henderson-Paradise, NV MSA and very poor in the Reno, NV MSA. Performance in limited-scope assessment areas has a negative effect on the state rating.

Las Vegas-Henderson-Paradise, NV MSA

In the Las Vegas-Henderson-Paradise, NV MSA, Bank of America has an excellent level of CD investments. The bank made 212 CD investments during the current evaluation period totaling \$137.2 million. Approximately \$127.8 million or 93 percent of the current period investment dollars supported 1,700 units of affordable housing. In addition, the bank has 150 CD investments totaling \$27.5 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$164.7 million or 10.4 percent of allocated Tier 1 Capital after considering the \$562.5 million in deposits not derived from the MSA. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$91 million or 66 percent of the investment dollars.

Examples of community development investments include:

- The bank provided \$1.3 million in grants to Accion New Mexico (Accion), a certified CDFI and member of the Accion U.S. network. Accion is the largest nonprofit micro and small business-lending network in the U.S. The organization used the funds to expand its small business loan pool to emerging entrepreneurs. These grants are responsive to the capital needs of small businesses in the MSA.
- The bank invested more than \$825,000 in a fund that makes direct and indirect investments in partnerships that own affordable housing developments throughout the U.S. LIHTCs support these housing developments. This transaction represents Horizon Pines in Henderson, NV with 156 units of affordable housing.
- The bank invested \$11 million in a LIHTC to support the rehabilitation of McKnight Senior Village, an existing 110-unit LIHTC senior housing complex in Las Vegas, NV. The complex has 90 units restricted to incomes at or below 50 percent of the area median income and 20 units at market rates.

Reno, NV MSA

In the Reno, NV MSA, Bank of America has a very poor level of CD investments. The bank made 27 CD investments during the evaluation period totaling \$5.6 million. Approximately \$5.5 million or 99 percent of the current period investment dollars supported 33 units of affordable housing. In addition, the bank has eight CD investments totaling \$1.6 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$7.2 million or 3.7 percent of allocated Tier 1 Capital. In addition to the community development investments, Bank of America made 12 grants and donations of more than \$49,000 to various community development organizations that serve the needs of the community. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$5.5 million or 99 percent of the investment dollars.

QUALIFIED INVESTMENTS		Geography: NEVADA				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Las Vegas, NV	150	27,487	212	137,172	362	164,658	89.78	4	11,352
Reno, NV	8	1,643	27	5,596	35	7,239	3.95	0	0
Limited Review									
Carson City, NV	2	40	12	790	14	830	0.45	0	0
Nevada Non-MSA	9	376	17	2,034	26	2,409	1.31	0	0
NEVADA - Statewide	0	0	14	139	14	139	0.08	0	0
NEVADA - Non Assessed	0	0	18	8,133	18	8,133	4.43	0	0
NEVADA	169	29,545	300	153,864	469	183,409	100.00	4	11,352

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Carson City, NV MSA and Nevada Non-MSA is weaker than the overall Low Satisfactory Investment Test performance in the state of Nevada, primarily due to significantly lower levels of CD investments relative to the bank's size and resources in those assessment areas. The poor performance in each limited-scope assessment area negatively affected the Investment Test rating.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Nevada is rated Outstanding. Service Test performance is good in the Las Vegas-Henderson-Paradise, NV MSA and excellent in the Reno, NV MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Las Vegas-Henderson-Paradise, NV MSA

In the Las Vegas-Henderson-Paradise, NV MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 50 financial centers with the distribution of the population. The bank has four financial centers representing 8 percent of its financial centers in low-income geographies where 5.3 percent of the population lives. The bank has 10 financial centers representing 20 percent of its financial centers located in moderate-income geographies where 22.8 percent of the population lives.

Examiners also considered the bank's alternative delivery systems, including cash dispensing ATMs, full-service ATMs, telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of alternative delivery systems through income proxies based on customers' residency. The percentages of customers in low- and moderate-income geographies using cash dispensing and full-service ATMs exceed the percentage of the population in low- and moderate-income geographies. The proportion of text banking usage is near the proportion of the population.

The bank has five financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to moderate-income census tracts. The adjacent financial centers help improve access to retail banking services to individuals in moderate-income geographies.

Financial center openings and closings generally did not affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank closed two financial centers: one in a middle-income geography and one in an upper-income geography. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are consistent throughout the assessment area. All financial centers are open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Las Vegas-Henderson-Paradise NV MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	28	5.7	103,228	5.3	4	8.0	15	8.2	0	0.0	0	0.0
Moderate	113	23.2	444,455	22.8	10	20.0	43	23.4	0	0.0	0	0.0
Middle	201	41.3	823,244	42.2	23	46.0	89	48.4	0	0.0	1	50.0
Upper	145	29.8	580,342	29.7	13	26.0	37	20.1	0	0.0	1	50.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	487	100.0	1,951,269	100.0	50	100.0	184	100.0	0	100.0	2	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Reno, NV MSA

In the Reno, NV MSA, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 13 financial centers with the distribution of the population. The bank has two financial centers representing 15.4 percent of its financial centers in low-income geographies where 10.1 percent of the population lives. The bank has four financial centers representing 30.8 percent of its financial centers located in moderate-income geographies where 22.3 percent of the population lives.

Examiners also considered the bank’s alternative delivery systems, including cash dispensing ATMs, full-service ATMs, telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of alternative delivery systems through income proxies based on customers’ residency. The percentages of customers in low- and moderate-income geographies using cash dispensing ATMs, full-service ATMs, and text banking exceed the percentage of the population in low- and moderate-income geographies. Usage of the remaining three platforms is near the proportion of the population.

The bank has one financial center in an upper-income census tract that is adjacent to or in very close proximity to a moderate-income census tract. The adjacent financial center helps improve access to retail banking services to individuals in moderate-income geographies.

Financial center openings and closings generally did not affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank closed three financial centers: two in moderate-income geographies and one in a middle-income geography. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are consistent throughout the assessment area. All financial centers are open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Reno NV MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	10	8.9	43,006	10.1	2	15.4	7	14.0	0	0.0	0	0.0
Moderate	24	21.4	94,975	22.3	4	30.8	15	30.0	0	0.0	2	66.7
Middle	36	32.1	148,271	34.9	1	7.7	8	16.0	0	0.0	1	33.3
Upper	37	33.0	138,940	32.7	6	46.2	20	40.0	0	0.0	0	0.0
NA	5	4.5	225	0.1	0	0.0	0	0.0	0	0.0	0	0.0
Totals	112	100.0	425,417	100.0	13	100.0	50	100.0	0	100.0	3	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Las Vegas-Henderson-Paradise, NV MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 180 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 108 low- and moderate-income individuals, and provided 15 financial education workshops and 16 foreclosure prevention workshops for 614 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 24 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 17 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Reno, NV MSA

The bank provides a relatively low level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 15 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to one low- or moderate-income individual, and provided three financial education workshops and one foreclosure prevention workshop for 111 individuals. Attendees to the financial education workshops were

primarily students from low- and moderate-income families. Employees participated in seven webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, three employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Nevada Non-MSA is consistent with the Outstanding Service Test performance in the state of Nevada. Performance in the Carson City, NV MSA is weaker. Performance is weaker primarily due to the lack of retail banking presence in the assessment area. Service delivery systems are limited to a single financial center, eight ATMs, and other alternative delivery systems.

State of New Hampshire

CRA Rating for New Hampshire³⁴: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Reasonably accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in New Hampshire

The state of New Hampshire is Bank of America's 30th largest rating area based on its total deposits in the state when excluding deposits in the Boston-Cambridge-Newton, MA-NH Multistate MSA. Examiners excluded the multistate MSA from the analysis of the state of New Hampshire because examiners evaluated the multistate MSA as a separate rating area. As of June 30, 2016, the bank maintained approximately \$3.6 billion or 0.3 percent of its total domestic deposits in financial centers in areas of the state of New Hampshire that do not include the multistate MSA. Of the 32 depository financial institutions operating in the state of New Hampshire, Bank of America, with a deposit market share of 15.6 percent, is the third largest. The bank's primary banking competitors for deposits in New Hampshire with deposit shares greater than 5 percent include Citizens Bank (26.2 percent) and TD Bank (18.9 percent). As of December 31, 2016, BANA operated 14 financial centers and 32 full-service ATMs in areas of the state of New Hampshire that exclude the multistate MSA.

Examiners used the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Manchester-Nashua, NH MSA, Bank of America reported an additional \$123.6 million in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations.

³⁴ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

Refer to the community profiles for the state of New Hampshire in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New Hampshire

The bank defined two assessment areas in the state of New Hampshire. Examiners selected the Manchester-Nashua, NH MSA for a full-scope review and the New Hampshire Non-MSA for a limited-scope review. While the Manchester-Nashua, NH MSA carries approximately 71 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in New Hampshire, examiners based the conclusions and ratings for the state on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 2,821 home mortgage loans totaling \$623.2 million, 5,161 small loans to businesses totaling \$186 million, 64 small loans to farms totaling \$479,000, and 5 CD loans totaling \$8.7 million. Based on loan volume, examiners weighted small loans to businesses, representing 64 percent of the volume, the most followed by home mortgage loans at 35.1 percent, and small loans to farms at less than 1 percent.

Examiners interviewed one local housing agency. The agency identified the following community needs: access to capital for small businesses; affordable housing; and neighborhood revitalization and stabilization.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW HAMPSHIRE

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of New Hampshire is rated High Satisfactory, based on excellent lending activity, good geographic distribution, and good borrower income distribution. Performance in the limited-scope assessment area has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of New Hampshire is excellent. Lending activity is excellent in the Manchester-Nashua, NH MSA.

Manchester-Nashua, NH MSA

Lending activity in the Manchester-Nashua, NH MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 22.7 percent. The bank ranks second among 19 depository financial institutions, which places it in the top 11 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.5 percent based on the number of home mortgage loans originated or purchased. The bank ranks 13th among 322 home mortgage lenders in the assessment area, which places it in the top 5 percent of lenders. According to peer small business data for 2016, the bank has an 8.3 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fourth among 85 small business lenders, which places it in the top 5 percent of lenders. For small loans to farms, the bank has a market share of 33.3 percent based on the number of small loans to farms originated or purchased. The bank ranks first among 10 farm lenders, which places it in the top 10 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: NEW HAMPSHIRE						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Manchester, NH	62.18	1,791	413,501	3,175	129,276	35	278	5	8,744	5,006	551,799	70.73
Limited Review												
New Hampshire Non-MSA	37.82	1,030	209,656	1,986	56,705	29	201	0	0	3,045	266,562	29.27
NEW HAMPSHIRE	100.00	2,821	623,157	5,161	185,981	64	479	5	8,744	8,051	818,361	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects good penetration in low- and moderate-income geographies. The distribution is excellent in the Manchester-Nashua, NH MSA; however, adequate performance in the limited-scope assessment area negatively affected the conclusion. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is good in the Manchester-Nashua, NH MSA.

Manchester-Nashua, NH MSA

The geographic distribution of home mortgage loans in the Manchester-Nashua, NH MSA is good. Performance is excellent in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 3 percent exceeds the 1.8 percent of owner-occupied housing units in low-income geographies and it exceeds the 2.2 percent for aggregate lenders. The distribution in moderate-income geographies at 10.1 percent is lower than the 14.2 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 13.8 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Manchester-Nashua NH MSA	695	194,002	62.1	15,978	1.8	3.0	2.2	14.2	9.1	13.8	55.7	47.3	54.4	28.3	40.6	29.6	0.0	0.0	0.0
LS New Hampshire Non-MSA	425	90,121	37.9	8,265	0.0	0.0	0.0	8.7	4.7	7.2	65.1	63.3	64.3	26.1	32.0	28.4	0.0	0.0	0.0
Total	1,120	284,123	100.0	24,243	1.0	1.9	1.5	11.8	7.4	11.6	60.0	53.4	57.8	27.3	37.3	29.2	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The distribution is excellent in the Manchester-Nashua, NH MSA. Performance in the limited-scope assessment area has a negative effect on the overall conclusion.

Manchester-Nashua, NH MSA

The geographic distribution of small loans to businesses in the Manchester-Nashua, NH MSA is excellent. Performance is good in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 10.5 percent is lower than the 11.7 percent of businesses in low-income geographies; however, it slightly exceeds the 9.9 percent performance for aggregate lenders. The distribution in moderate-income geographies at 13.9 percent is slightly below the 14.3 percent of businesses in moderate-income geographies and it exceeds the 13.6 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Busines sses	% Bank Loans	Aggre gate	% Busine sses	% Bank Loans	Aggre gate	% Busine sses	% Bank Loans	Aggre gate	% Busine sses	% Bank Loans	Aggre gate	% Busine sses	% Bank Loans	Aggre gate
FS Manchester-Nashua NH MSA	2,001	74,419	62.3	8,463	11.7	10.5	9.9	14.3	13.9	13.6	49.0	45.2	47.7	24.5	29.7	28.3	0.4	0.7	0.5
LS New Hampshire Non-MSA	1,209	32,780	37.7	5,787	0.0	0.0	0.0	9.6	6.6	9.2	65.4	61.2	65.4	24.9	32.2	25.4	0.0	0.0	0.0
Total	3,210	107,199	100.0	14,250	6.4	6.6	5.9	12.2	11.2	11.8	56.4	51.2	54.9	24.7	30.6	27.1	0.2	0.4	0.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is adequate. Performance is poor in the Manchester-Nashua, NH MSA. Performance in the limited-scope assessment area has a positive effect on the overall conclusion.

Manchester-Nashua, NH MSA

The geographic distribution of small loans to farms in the Manchester-Nashua, NH MSA is poor, based on poor performance in low-income geographies and very poor performance in moderate-income geographies. The geographic distribution of small loans to farms in low-income geographies at 0 percent is below the 2.6 percent of farms in low-income geographies, but it is consistent with the 0 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 0 percent is also less than the 9.8 percent of farms in moderate-income geographies and it is below the 3.7 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS Manchester-Nashua NH MSA	22	201	52.4	27	2.6	0.0	0.0	9.8	0.0	3.7	57.9	50.0	74.1	29.7	50.0	22.2	0.0	0.0	0.0
LS New Hampshire Non-MSA	20	178	70.0	57	0.0	0.0	0.0	7.5	14.3	8.8	67.6	80.0	71.9	24.9	23.1	19.3	0.0	0.0	0.0
Total	42	379	100.0	84	1.2	0.0	0.0	8.5	10.0	7.1	63.2	64.3	72.6	27.1	33.3	20.2	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. The distribution is good in the Manchester-Nashua, NH MSA. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Manchester-Nashua, NH MSA.

Manchester-Nashua, NH MSA

The distribution of home mortgage loans by borrower income in the Manchester-Nashua, NH MSA is good. The distribution is adequate to low-income borrowers and it is good to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 7.5 percent is lower than the 18.9 percent of low-income families in the MSA; however, the bank’s performance is higher than the 4.6 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 15.1 percent is lower than the 18.8 percent of moderate-income families and it is slightly lower than the 17.7 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate
FS Manchester-Nashua NH MSA	695	194,002	62.1	15,978	18.9	7.5	4.6	18.8	15.1	17.7	23.6	24.2	23.5	38.7	44.5	35.6	0.0	8.8	18.7
LS New Hampshire Non-MSA	425	90,121	37.9	8,265	16.6	6.4	3.2	17.4	13.2	15.9	22.8	21.9	22.2	43.2	52.7	41.7	0.0	5.9	17.0
Total	1,120	284,123	100.0	24,243	17.9	7.1	4.1	18.2	14.4	17.1	23.3	23.3	23.0	40.6	47.6	37.7	0.0	7.7	18.1

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Manchester-Nashua, NH MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 38 percent of its small loans to businesses.

Manchester-Nashua, NH MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Manchester-Nashua, NH MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 47.7 percent is lower than the 78 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 42.1 percent for aggregate lenders, overall performance is good.

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
FS Manchester-Nashua NH MSA	2,001	74,419	62.3	8,463	78.0	47.7	42.1	6.2	14.7	15.9	37.6
LS New Hampshire Non-MSA	1,209	32,780	37.7	5,787	76.4	48.5	43.5	5.6	12.9	18.0	38.6
Total	3,210	107,199	100.0	14,250	77.3	48.0	42.7	5.9	14.1	16.8	38.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good. Performance is good in the Manchester-Nashua, NH MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 36 percent of its small loans to farms.

Manchester-Nashua, NH MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Manchester-Nashua, NH MSA is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 63.6 percent is lower than the 96.8 percent of farms with gross annual revenues of \$1 million or less. However, the bank’s distribution exceeds the 44.4 percent for aggregate lenders.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Manchester-Nashua NH MSA	22	201	59.4	27	96.8	63.6	44.4	2.0	10.0	1.2	36.8
LS New Hampshire Non-MSA	20	178	47.6	57	97.2	45.0	29.8	1.4	23.1	1.4	40.0
Total	42	379	100.0	84	97.0	54.8	34.5	1.7	12.5	1.4	35.7

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect overall on the bank's Lending Test performance in the state of New Hampshire. The bank met the community's credit needs primarily through retail lending.

Manchester-Nashua, NH MSA

The bank originated or purchased an adequate level of CD loans in the Manchester-Nashua, NH MSA. The bank originated five CD loans totaling \$8.7 million during the review period. The loans were responsive to community development needs in the assessment area, particularly the rehabilitation and development of affordable housing and promotion of economic development by financing small businesses. The most notable example of CD lending was \$7.2 million in loans to finance the conversion of the historic Pine Valley Mill to provide 50 units of affordable housing.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of New Hampshire, lending under the MHA and HARP programs accounted for 88 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the New Hampshire Non-MSA is weaker than the overall High Satisfactory Lending Test performance in the state of New Hampshire primarily due to weaker geographic distributions of loans.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America’s performance under the Investment Test in the state of New Hampshire is rated Outstanding. Investment performance is excellent in the Manchester-Nashua, NH MSA. Performance in the limited-scope assessment area has a neutral effect on the state rating.

Manchester-Nashua, NH MSA

In the Manchester-Nashua, NH MSA, Bank of America has an excellent level of CD investments. The bank made 120 CD investments during the current evaluation period totaling \$46.1 million. Approximately \$45.6 million or 99 percent of the current period investment dollars supported 328 units of affordable housing. In addition, the bank has 72 CD investments totaling \$6.7 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$52.8 million or 17.2 percent of allocated Tier 1 Capital. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$35.5 million or 77 percent of the investment dollars.

Examples of community development investments include:

- The bank invested nearly \$5.7 million into a Fannie Mae commercial mortgage-backed security. Pheasant Run Apartments, a 341-unit multifamily affordable housing development, secures the mortgage-backed security. The development has 68 units or 20 percent of the units restricted to incomes at or below 50 percent of the area median income.
- The bank invested \$9.9 million in a LIHTC and Historic Tax Credit to fund the partial conversion of Pine Valley Mill, a historic mill building in Milford, NH into 50 units of affordable housing. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank invested more than \$114,000 in a LIHTC supporting Antrim Village, a 40-unit affordable housing development in Antrim, NH. All units are restricted to incomes at or below 50 percent of the area median income. The bank’s portion of funding helped to finance four of the units.

QUALIFIED INVESTMENTS	Geography: NEW HAMPSHIRE				Evaluation Period: January 1, 2012 to December 31, 2016					
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Manchester, NH	72	6,704	120	46,077	192	52,782	71.64	1	29	
Limited Review										
New Hampshire Non-MSA	35	5,233	66	14,080	101	19,313	26.21	4	195	
NEW HAMPSHIRE - Statewide	0	0	5	19	5	19	0.03	0	0	
NEW HAMPSHIRE - Non Assessed	7	828	12	733	19	1,561	2.12	0	0	
NEW HAMPSHIRE	114	12,765	203	60,909	317	73,674	100.00	5	224	

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the New Hampshire Non-MSA is consistent with the Outstanding Investment Test performance in the state of New Hampshire.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of New Hampshire is rated Low Satisfactory. Service Test performance is adequate in the Manchester-Nashua, NH MSA. Performance in the limited-scope assessment area has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Manchester-Nashua, NH MSA

In the Manchester-Nashua, NH MSA, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's eight financial centers with the distribution of the population. The bank has three financial centers in low-income geographies or 37.5 percent of its financial centers where only 6.6 percent of the population lives. However, the bank has no financial centers located in moderate-income geographies where 18.8 percent of the population lives.

Examiners also considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have no effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies.

The bank has three financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. The adjacent financial centers help improve access to retail banking services to individuals in moderate-income geographies.

Financial center openings and closings did adversely affect the accessibility of retail banking services, particularly in moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center and closed six. The bank closed one financial center in a low-income geography, two in moderate-income geographies, and three in middle- and upper-income geographies.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income

individuals. The bank offers a full range of products and services. Hours of operation are consistent throughout the assessment area. Financial centers are open 9:00 am to 4:00 pm Monday through Friday and 9:00 am to 12:00 pm on Saturday. One financial center in a low-income census tract operates from 8:30 am to 4:30 pm Monday through Friday with no Saturday banking.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Manchester-Nashua NH MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	8	9.3	26,403	6.6	3	37.5	4	19.0	1	100.0	1	16.7
Moderate	19	22.1	75,178	18.8	0	0.0	0	0.0	0	0.0	2	33.3
Middle	42	48.8	204,790	51.1	4	50.0	14	66.7	0	0.0	2	33.3
Upper	16	18.6	94,350	23.5	1	12.5	3	14.3	0	0.0	1	16.7
NA	1	1.2	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	86	100.0	400,721	100.0	8	100.0	21	100.0	1	100.0	6	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Manchester-Nashua, NH MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 51 community development services targeted to low- and moderate-income individuals. Employees provided three financial education workshops for 69 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 17 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 17 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the New Hampshire Non-MSA is weaker than the overall Low Satisfactory Service Test performance in the state of New Hampshire primarily due to the weaker distribution of financial centers and retail banking access, particularly in moderate-income geographies.

State of New Jersey

CRA Rating for New Jersey³⁵: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Good volume of loans originated or purchased within the assessment area;
- Adequate distribution of loans by geography and good distribution by borrower income or business revenue size;
- Limited level of CD lending that has a negative effect on the Lending Test rating;
- Significant level and good responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in New Jersey

The state of New Jersey is Bank of America's 26th largest rating area based on its total deposits in the state when excluding deposits in the Allentown-Bethlehem-Easton, PA-NJ, New York-Newark-Jersey City, NY-NJ, and Philadelphia-Camden-Wilmington, PA-NJ-DE Multistate MSAs. Examiners excluded the multistate MSAs from the analysis of the state of New Jersey because examiners evaluated the multistate MSAs as separate rating areas. As of June 30, 2016, the bank maintained approximately \$4.6 billion or 0.4 percent of its total domestic deposits in financial centers in areas of the state of New Jersey that do not include the multistate MSAs. Of the 44 depository financial institutions operating in areas of the state that exclude the multistate MSAs, Bank of America, with a deposit market share of 16.7 percent, is the largest. Banking competitors with deposit market shares greater than 5 percent include TD Bank (11.2 percent), Wells Fargo Bank (11 percent), and PNC Bank (10.4 percent). As of December 31, 2016, the bank operated 33 full-service financial centers and 78 deposit-taking ATMs in the areas of the state that do not include the multistate MSAs.

Refer to the community profiles for the state of New Jersey in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

³⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in New Jersey

The bank has defined four assessment areas in the state of New Jersey. Examiners selected the Atlantic City-Hammonton, NJ MSA and Trenton, NJ MSA for full-scope reviews. The remaining two assessment areas, Ocean City, NJ MSA and Vineland-Bridgeton, NJ MSA, received limited-scope reviews. While the Atlantic City-Hammonton, NJ MSA and Trenton, NJ MSA carry approximately 90.6 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in New Jersey, examiners based the conclusions and ratings for the state on the activities within all assessment areas.

During the evaluation period, Bank of America originated or purchased 6,206 home mortgage loans totaling \$1.6 billion, 7,667 small loans to businesses totaling \$247.5 million, 95 small loans to farms totaling \$977,000, and 3 CD loans totaling \$23 million. Based on loan volume, examiner weighted home mortgage and small business lending equally, which carried more weight than small loans to farms in determining the Lending Test rating.

The bank did not originate or purchase sufficient volumes of small loans to farms in the Trenton, NJ MSA, Ocean City, NJ MSA, and Vineland-Bridgeton, NJ MSA to provide any meaningful analyses.

Examiners conducted telephone interviews with three local community development organizations. The organizations identified affordable housing, affordable rental assistance, loans to improve older housing stock, employment, and continued disaster assistance as community needs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW JERSEY

LENDING TEST

Bank of America's performance under the Lending Test in the state of New Jersey is rated Low Satisfactory, based on good lending activity, adequate geographic distribution, and good borrower income distribution. The lack of any CD lending in the Trenton, NJ MSA, which is the largest assessment area in New Jersey with about 74 percent of the state's deposits, has a positive effect on the Lending Test rating. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of New Jersey is good. Lending activity is excellent in the Atlantic City-Hammonton, NJ MSA and it is good in the Trenton, NJ MSA.

Atlantic City-Hammonton, NJ MSA

Lending activity in the Atlantic City-Hammonton, NJ MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 13.1 percent. The bank ranks fourth among 16 depository financial institutions in the assessment area, which places it in the top 25 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 3.1 percent based on the number of home mortgage loans originated or purchased. The bank ranks eighth among 334 home mortgage lenders, which places it in the top 3 percent of lenders. According to peer small business data for 2016, the bank has a 7.3 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fourth among 83 small business lenders, which places it in the top 5 percent of lenders in the MSA. According to peer farm data for 2016, the bank has a 22.7 percent market share of small loans to farms based on the number of small loans to farms originated or purchased. The bank ranks first among eight farm lenders, which places it in the top 13 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans, small loans to businesses, and small loans to farms relative to its ranking for deposits, and the greater weight placed on home mortgage and small loans to businesses, overall lending activity is excellent.

Trenton, NJ MSA

Lending activity in the Trenton, NJ MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 22.1 percent. The bank ranks first among 26 depository financial institutions in the assessment area, which places it in the top 4 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 4 percent based on the number of home mortgage loans originated or purchased. The bank ranks fifth among 395 home mortgage lenders, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has a 9.1 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fourth among 95 small business lenders, which places it in the top 5 percent of lenders. The bank originated or purchased too few small loans to farms for any meaningful analysis. Considering the bank's higher ranking among all lenders for small loans to businesses relative to its ranking for deposits and the greater weight placed on home mortgage and small loans to businesses, overall lending activity is excellent.

Table 1. Total Lending Volume											2012-2016	
LENDING VOLUME			Geography: NEW JERSEY					Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Atlantic City, NJ	29.49	1,875	409,450	2,213	82,616	31	359	1	15,236	4,120	507,661	16.43
Trenton, NJ	43.91	2,578	701,187	3,535	124,398	22	156	0	0	6,135	825,741	74.20
Limited Review												
Ocean City, NJ	16.30	1,089	410,165	1,159	21,933	29	359	0	0	2,277	432,457	4.67
Vineland, NJ	10.30	664	98,544	760	18,578	13	103	2	7,770	1,439	124,995	4.71
NEW JERSEY	100.00	6,206	1,619,346	7,667	247,525	95	977	3	23,006	13,971	1,890,854	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects adequate penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is excellent in the Atlantic City-Hammonton, NJ MSA and good in the Trenton, NJ MSA.

Atlantic City-Hammonton, NJ MSA

The geographic distribution of home mortgage loans in the Atlantic City-Hammonton, NJ MSA is excellent. Performance is excellent in low-income census tracts and excellent in moderate-income census tracts. The distribution of the bank's home mortgage loans in low-income geographies at 2.7 percent is slightly lower than the 2.9 percent of owner-occupied housing units in low-income geographies and it is higher than the 1.3 percent for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 16.6 percent is higher than the 14.1 percentage of owner-occupied housing units in moderate-income geographies and it is higher than the 10.8 percent for aggregate lenders.

Trenton, NJ MSA

The geographic distribution of home mortgage loans in the Trenton, NJ MSA is good. Performance is good in low-income and moderate-income census tracts. The distribution of the bank's home mortgage loans in low-income geographies at 4.9 percent is slightly lower than the 6.9 percent of owner-occupied housing units in low-income geographies and it is higher than the 2.8 percent for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 11.9 percent is lower than the 14.1 percentage of owner-occupied housing units in moderate-income geographies and it is higher than the 9.9 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Atlantic City-Hammonton NJ MSA	700	147,061	28.6	7,134	2.9	2.7	1.3	14.1	16.6	10.8	55.4	51.7	53.7	27.6	29.0	34.2	0.0	0.0	0.0
FS Trenton NJ MSA	1,053	313,167	43.0	8,342	6.9	4.9	2.8	14.1	11.9	9.9	36.7	27.2	37.2	42.4	56.0	50.2	0.0	0.0	0.0
LS Ocean City NJ MSA	464	196,182	19.0	6,336	3.0	1.7	1.4	22.5	17.7	18.7	46.2	51.1	53.3	28.4	29.5	26.6	0.0	0.0	0.0
LS Vineland-Bridgeton NJ MSA	231	30,413	9.4	2,789	2.2	2.6	0.9	11.7	15.6	9.0	61.9	60.2	62.3	24.2	21.6	27.8	0.0	0.0	0.0
Total	2,448	686,823	100.0	24,601	4.3	3.5	1.8	15.0	14.7	12.3	47.8	41.8	49.0	32.9	40.0	36.9	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is adequate. The distribution is good in the Atlantic City-Hammonton, NJ MSA and adequate in the Trenton, NJ MSA.

Atlantic City-Hammonton, NJ MSA

The geographic distribution of small loans to businesses in the Atlantic City-Hammonton, NJ MSA is good overall. The distribution is excellent in low-income geographies and adequate in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 10 percent is higher than the 8.7 percent of businesses operating in low-income geographies and it is higher than the 8.6 percent for aggregate lenders. The proportion of the bank’s small loans to businesses in moderate-income geographies at 12.3 percent is lower than the 13.8 percent of businesses operating in moderate-income geographies and it is lower than the 15 percent for aggregate lenders.

Trenton, NJ MSA

The geographic distribution of small loans to businesses in the Trenton, NJ MSA is adequate overall. The distribution is poor in low-income geographies and adequate in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 4.3 percent is lower than the 11.1 percent of businesses operating in low-income geographies and lower than the 7.5 percent for aggregate lenders. The proportion of the bank’s small loans to businesses in moderate-income geographies at 7.9 percent is lower than the 10.5 percent of businesses operating in moderate-income geographies and it is lower than the 10.4 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate
FS Atlantic City-Hammonton NJ MSA	1,404	52,685	28.9	6,348	8.7	10.0	8.6	13.8	12.3	15.0	50.4	50.1	49.5	27.1	27.6	26.7	0.1	0.0	0.2
FS Trenton NJ MSA	2,277	75,704	46.8	8,909	11.1	4.3	7.5	10.5	7.9	10.4	29.6	22.0	26.3	48.8	65.7	55.8	0.0	0.0	0.0
LS Ocean City NJ MSA	682	12,064	14.0	3,085	2.2	1.6	1.7	23.4	24.3	24.5	45.1	47.9	43.9	29.3	26.1	29.8	0.0	0.0	0.0
LS Vineland-Bridgeton NJ MSA	498	12,484	10.2	2,310	9.7	14.1	17.1	13.9	11.0	8.4	57.6	54.6	56.1	18.8	20.3	18.1	0.0	0.0	0.3
Total	4,861	152,937	100.0	20,652	8.9	6.6	8.1	13.9	11.8	13.7	41.7	37.1	39.4	35.6	44.5	38.8	0.0	0.0	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to farms.

The overall geographic distribution of small loans to farms is poor, driven by performance in the Atlantic City-Hammonton, NJ MSA.

Atlantic City-Hammonton, NJ MSA

The geographic distribution of small loans to farms in the Atlantic City-Hammonton, NJ MSA is poor overall. The distribution is adequate in low-income geographies and poor in moderate-income geographies. The proportion of the bank’s small loans to farms in low-income geographies at 0 percent is lower than the 0.7 percent of farms in low-income geographies and it is consistent with the 0 percent for aggregate lenders. Considering that very few farms are located in low-income geographies, which indicate fewer opportunities to make small loans to farms, performance is adequate. The bank’s proportion of small loans to farms in moderate-income geographies at 0 percent is lower than the 7.6 percent of farms in moderate-income geographies and 4.8 percent for aggregate lenders. The lower aggregate performance when compared to the percent of farms in moderate-income geographies is indicative of the limited opportunities to make small loans to farms in the MSA.

Trenton, NJ MSA

The bank originated or purchased too few small loans to farms to provide any meaningful analysis.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Atlantic City-Hammonton NJ MSA	18	279	29.0	21	0.7	0.0	0.0	7.6	0.0	4.8	60.6	83.3	76.2	31.1	16.7	19.0	0.0	0.0	0.0
FS Trenton NJ MSA	13	120	21.0	11	4.9	0.0	0.0	12.6	0.0	0.0	30.0	0.0	0.0	52.5	100.0	100.0	0.0	0.0	0.0
LS Ocean City NJ MSA	21	297	37.5	10	2.6	23.1	10.0	12.4	16.7	20.0	44.8	47.6	60.0	40.2	33.3	10.0	0.0	0.0	0.0
LS Vineland-Bridgeton NJ MSA	10	83	19.6	25	0.7	0.0	0.0	6.3	0.0	0.0	62.6	60.0	76.0	30.4	44.4	24.0	0.0	0.0	0.0
Total	62	779	100.0	67	2.4	7.7	1.5	9.8	6.3	4.5	48.2	50.0	61.2	39.6	43.5	32.8	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Atlantic City-Hammonton, NJ MSA and good in the Trenton, NJ MSA.

Atlantic City-Hammonton, NJ MSA

The bank’s distribution of home mortgage loans by borrower income in the Atlantic City-Hammonton, NJ MSA is good overall. The distribution is adequate to low-income borrowers and excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income families at 8.6 percent is significantly lower than the 21.3 percent of low-income families, yet is higher than the 3.3 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income families at 17.6 percent is slightly lower than the proportion of moderate-income families at 17.8 percent, but it exceeds the 11 percent performance for aggregate lenders.

Trenton, NJ MSA

The bank’s distribution of home mortgage loans by borrower income in the Trenton, NJ MSA is good overall. The distribution is adequate to low-income borrowers and excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income families at 10.4 percent is significantly lower than the 22.8 percent of low-income families, but it is higher than the 6.4 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income families at 15.8 percent is slightly lower than the 16.8 percent of moderate-income families, but it is slightly higher than the 15.3 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Atlantic City-Hammonton NJ MSA	700	147,061	28.6	7,134	21.3	8.6	3.3	17.8	17.6	11.0	20.5	21.0	17.8	40.4	40.0	45.3	0.0	12.9	22.5
FS Trenton NJ MSA	1,053	313,167	43.0	8,342	22.8	10.4	6.4	16.8	15.8	15.3	19.2	15.2	17.4	41.2	43.9	43.1	0.0	14.8	17.8
LS Ocean City NJ MSA	464	196,182	19.0	6,336	21.8	5.2	3.9	17.9	10.8	8.3	19.7	11.6	14.1	40.6	65.7	63.9	0.0	6.7	9.9
LS Vineland-Bridgeton NJ MSA	231	30,413	9.4	2,789	23.9	9.5	2.7	15.8	13.0	12.8	19.9	24.7	20.8	40.4	32.0	34.5	0.0	20.8	29.2
Total	2,448	686,823	100.0	24,601	22.4	8.8	4.4	17.1	15.1	12.0	19.8	17.1	17.1	40.7	45.8	48.1	0.0	13.3	18.4

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Atlantic City-Hammonton, NJ MSA and good in the Trenton, NJ MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 35 percent of its small loans to businesses.

Atlantic City-Hammonton, NJ MSA

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Atlantic City-Hammonton, NJ MSA is good. The proportion of the bank’s small loans to businesses at 53.5 percent is lower than the 77.7 percent of businesses with gross annual revenues of \$1 million or less. However, considering the bank’s distribution is greater than the 36.9 percent for aggregate lenders, overall performance is good.

Trenton, NJ MSA

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Trenton, NJ MSA is good. The proportion of the bank’s small loans to businesses at 53.8 percent is lower than the 74.4 percent of businesses with gross annual revenues of \$1 million or less. However, considering the bank’s distribution is greater than the 42.8 percent for aggregate lenders, overall performance is good.

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
FS Atlantic City-Hammonton NJ MSA	1,404	52,685	28.9	6,348	77.7	53.5	36.9	5.0	13.7	17.3	32.8
FS Trenton NJ MSA	2,277	75,704	46.8	8,909	74.4	53.8	42.8	7.3	11.6	18.3	34.7
LS Ocean City NJ MSA	682	12,064	14.0	3,085	79.0	50.9	44.7	4.3	7.0	16.7	42.1
LS Vineland-Bridgeton NJ MSA	498	12,484	10.2	2,310	74.9	50.0	35.5	7.2	16.9	18.0	33.1
Total	4,861	152,937	100.0	20,652	76.1	52.9	40.5	6.1	12.1	17.7	35.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate, driven by performance in the Atlantic City-Hammonton, NJ MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 27 percent of its small loans to farms.

Atlantic City-Hammonton, NJ MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Atlantic City-Hammonton, NJ MSA is adequate. Approximately 55.6 percent of the bank’s small loans were to farms with gross annual revenues of \$1 million or less. The bank’s proportion is lower than the 95.7 percent of farms with gross annual revenues of \$1 million or less, which indicates poor performance. However, when considering the bank’s proportion of loans is greater than the 52.4 percent performance for aggregate lenders, overall performance is adequate.

Trenton, NJ MSA

The bank originated or purchased too few small loans to businesses to provide any meaningful analysis.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Atlantic City-Hammonton NJ MSA	18	279	31.3	21	95.7	55.6	52.4	3.8	20.0	0.4	38.9
FS Trenton NJ MSA	13	120	21.0	11	95.3	69.2	54.5	2.5	50.0	2.2	25.0
LS Ocean City NJ MSA	21	297	33.9	10	97.2	57.1	50.0	1.5	23.1	1.3	28.6
LS Vineland-Bridgeton NJ MSA	10	83	21.7	25	95.6	77.8	24.0	3.0	20.0	1.4	40.0
Total	62	779	100.0	67	95.8	61.3	41.8	2.9	17.9	1.3	27.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a negative effect overall on the bank’s Lending Test performance in the state of New Jersey, driven mostly by the lack of CD lending in the Trenton, NJ MSA.

Atlantic City-Hammonton, NJ MSA

CD lending has a significantly positive effect on the bank’s Lending Test performance in the Atlantic City-Hammonton, NJ MSA. During the evaluation period, the bank originated one CD loan totaling \$15.2 million that helped provide affordable housing within the assessment area. CD lending represents 16 percent of the allocated Tier 1 Capital.

Trenton, NJ MSA

CD lending has a negative effect on the bank’s Lending Test performance in the Trenton, NJ MSA. The bank originated no CD loans during the evaluation period.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of New Jersey, lending under the MHA and HARP programs accounted for 84 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Ocean City, NJ MSA and Vineland-Bridgeton, NJ MSA is stronger than the overall Low Satisfactory performance under the Lending Test in the state of New Jersey primarily due to stronger geographic distributions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test in the state of New Jersey is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Atlantic City-Hammonton, NJ MSA is poor and the performance in the Trenton, NJ MSA is excellent. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Atlantic City-Hammonton, NJ MSA

Bank of America's performance under the Investment Test in the Atlantic City-Hammonton, NJ MSA is poor. The bank made 39 community development investments during the current evaluation period totaling \$3.3 million. Approximately \$2.3 million or 70 percent of the current period investment dollars supported 15 units of affordable housing. In addition, the bank has 19 community development investments totaling \$1 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$4.3 million or 4.6 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$2.3 million or 70 percent of the investment dollars.

Examples of community development investments include:

- The bank donated \$213,000 to a non-profit organization with a mission to fight hunger and poverty in New Jersey. The organization achieves its mission through its own programs and 1,100 hunger-fighting member charities including soup kitchens, food pantries, and shelters. The Food Bank distributes more than 40 million pounds of food and groceries annually. All of the individuals and families served have household incomes at or below 185 percent of the federal poverty level or 46-74 percent of the average median income for a family of four.
- The bank donated \$350,000 to a non-profit organization with a mission to alleviate pain and foster growth in people who are experiencing a wide variety of personal and relationship problems. More than 75 percent of the individuals and families served are 200 percent below the federal poverty level.
- The bank invested \$70,000 in a nonprofit certified CDFI, which provides capital and technical assistance in order to build the economic self-sufficiency of low-income individuals and communities. The Community Loan Fund intends to use the proceeds from this investment to provide flexible and creative financing through a broad spectrum of credit offerings to customers who either lack access to capital or cannot afford the cost of capital from conventional sources.

Trenton, NJ MSA

Bank of America’s performance under the Investment Test in the Trenton, NJ MSA is excellent. The bank made 176 community development investments during the current evaluation period totaling \$38.3 million. Approximately \$35 million or 92 percent of the current period investment dollars supported 277 units of affordable housing. In addition, the bank has 33 community development investments totaling \$2.7 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$41.0 million or 9.5 percent of the bank’s Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$33.9 million or 88 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$2 million in a certified CDFI with a mission to create and preserve healthy communities where low-income people live and work. The organization seeks to create transformational change across low-income communities by financing community development projects that include affordable housing, but also encompass childcare, public education, healthcare facilities, and commercial revitalization projects that serve as a foundation for healthy communities.
- The bank invested \$1.1 million in a fund that owns affordable rental housing projects financed in part with Federal LIHTCs. The 471 projects represent 45,553 rental units, of which 43,672 units or 96 percent are income restricted affordable housing units.
- The bank donated \$275,000 to a non-profit organization with a mission to end homelessness in Central New Jersey by harnessing the caring resources and expertise of the community. The organization has helped over 13,000 people with emergency shelter, permanent housing, food, educational/vocational training, and linkages to critically needed services. All of the clients served have household incomes at or below 68 percent of the average median income.

QUALIFIED INVESTMENTS		Geography: NEW JERSEY				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Atlantic City, NJ	19	1,035	39	3,319	58	4,354	8.67	0	0	
Trenton, NJ	33	2,717	176	38,292	209	41,008	81.63	0	0	
Limited Review										
Ocean City, NJ	3	74	10	846	13	921	1.83	0	0	
Vineland, NJ	6	1,917	26	885	32	2,802	5.58	0	0	
NEW JERSEY - Statewide	1	11	32	1,081	33	1,092	2.17	0	0	
NEW JERSEY - Non Assessed	1	22	8	36	9	58	0.11	0	0	
NEW JERSEY	63	5,775	291	44,459	354	50,234	100.00	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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Vineland-Bridgeton, NJ MSA is stronger than the overall High Satisfactory performance due to higher levels of community development investments. Performance in the Ocean City, NJ MSA is weaker than the overall High Satisfactory performance due to significantly lower levels of community development investments. Performance in the limited-scope areas did not negatively affect the overall rating for the Lending Test in the state of New Jersey.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the state of New Jersey is rated High Satisfactory. Based on full-scope reviews, the bank's performance is good in both the Atlantic City-Hammonton, NJ MSA and the Trenton, NJ MSA. Performance in limited-scope assessment areas have a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services in the state of New Jersey.

Atlantic City-Hammonton, NJ MSA

BANA's service delivery systems in the Atlantic City-Hammonton, NJ MSA are accessible to geographies and individuals of different income levels, based on a comparison of the bank's nine financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has one financial center in low-income geographies representing 11.1 percent of its financial centers. Considering 6.9 percent of the population lives in low-income geographies, the distribution of the bank's financial centers in low-income geographies is excellent. The bank also has one financial center in moderate-income geographies representing 11.1 percent of its financial centers. Considering 19.8 percent of the population lives in moderate-income geographies, the financial center distribution is adequate.

Examiners also considered the bank's alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies.

The bank has one financial center in a middle-income geography that is adjacent to or is in very close proximity to a moderate-income geography. This adjacent financial center further improves access of service delivery systems to low- and moderate-income individuals and geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank closed four financial centers in middle- and upper-income geographies. There were no closures of financial centers in low- and moderate-income geographies.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment areas, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial center lobby hours are primarily 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Atlantic City-Hammonton NJ MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	7	10.1	18,810	6.9	1	11.1	3	13.0	0	0.0	0	0.0
Moderate	13	18.8	54,410	19.8	1	11.1	2	8.7	0	0.0	0	0.0
Middle	32	46.4	136,030	49.5	3	33.3	9	39.1	0	0.0	3	75.0
Upper	16	23.2	62,882	22.9	4	44.4	9	39.1	0	0.0	1	25.0
NA	1	1.4	2,417	0.9	0	0.0	0	0.0	0	0.0	0	0.0
Totals	69	100.0	274,549	100.0	9	100.0	23	100.0	0	100.0	4	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Trenton, NJ MSA

BANA’s service delivery systems in the Trenton, NJ MSA are accessible to geographies and individuals of different income levels, based on a comparison of the bank’s 15 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has two financial centers in low-income geographies representing 13.3 percent of its financial centers. Considering 13.6 percent of the population lives in low-income geographies, financial center distribution is excellent. The bank has one financial center in moderate-income geographies representing 6.7 percent of its financial centers. Considering 16 percent of the population resides in moderate-income geographies, financial center distribution is poor.

Examiners also considered the bank’s alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies.

The bank has two financial centers in a middle-income geography that are adjacent to or are in very close proximity to a moderate-income geography. These adjacent financial centers further improve access of service delivery systems to low- and moderate-income individuals and geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and

moderate-income individuals. During the evaluation period, the bank closed one financial center in a low-income geography. While this closure was in a low-income geography, the percentage of financial centers in low-income geographies remains in line with the population distribution.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment areas, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial center lobby hours are primarily 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Trenton NJ MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	15	19.5	49,747	13.6	2	13.3	4	11.1	0	0.0	1	100.0
Moderate	14	18.2	58,690	16.0	1	6.7	3	8.3	0	0.0	0	0.0
Middle	23	29.9	116,912	31.9	4	26.7	9	25.0	0	0.0	0	0.0
Upper	24	31.2	139,265	38.0	8	53.3	20	55.6	0	0.0	0	0.0
NA	1	1.3	1,899	0.5	0	0.0	0	0.0	0	0.0	0	0.0
Totals	77	100.0	366,513	100.0	15	100.0	36	100.0	0	100.0	1	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Atlantic City-Hammonton, NJ MSA

The bank provides a limited level of community development services within the Atlantic City-Hammonton, NJ MSA. During the evaluation period, the bank participated with community development organizations to provide eight community development services targeted to low- and moderate-income individuals. Employees provided three financial education workshops for 51 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in five webinars and workshops with non-profit organizations to help the organizations with capacity building. No employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Trenton, NJ MSA

The bank provides a relatively high level of community development services within the Trenton, NJ MSA. During the evaluation period, the bank participated with community development organizations to provide 130 community development services targeted to low- and moderate-income individuals. Employees provided 100 financial education workshops for 2,085 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 15 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 15 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

The bank's Service Test performance in the Ocean City, NJ MSA and Vineland-Bridgeton, NJ MSA is weaker than the bank's overall High Satisfactory performance under the Service Test in New Jersey primarily due to a weaker distribution of financial centers. Performance in the limited-scope areas did not negatively affect the overall rating for the Investment Test in the state of New Jersey.

State of New Mexico

CRA Rating for New Mexico³⁶: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment area;
- Excellent distribution of loans by geography and good distribution by borrower income or business revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Good level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in New Mexico

The state of New Mexico is Bank of America's 31st largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$3.6 billion or 0.3 percent of its total domestic deposits in financial centers within the state of New Mexico. Of the 58 depository financial institutions operating in the state, Bank of America, with a deposit market share of 11.6 percent, is the second largest. Depository financial institutions in the state with market shares greater than 5 percent include Wells Fargo Bank (29 percent) and U.S. Bank (5.1 percent). As of December 31, 2016, the bank operated 25 full-service financial centers and 82 deposit-taking ATMs in the state.

Refer to the community profiles for the state of New Mexico in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New Mexico

The bank has defined five assessment areas in the state of New Mexico. Examiners selected the Albuquerque, NM MSA and New Mexico Non-MSA for full scope reviews. The remaining three assessment areas including Farmington, NM MSA, Las Cruces, NM MSA, and Santa Fe, NM MSA, received limited scope reviews. While the Albuquerque, NM MSA and New Mexico

³⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Non-MSA carry approximately 77.2 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in New Mexico, examiners based the conclusions and ratings for the state on the activities within all assessment areas.

During the evaluation period, Bank of America originated or purchased 6,920 home mortgage loans totaling \$1.2 billion, 7,482 small loans to businesses totaling \$228.1 million, 96 small loans to farms totaling \$1.0 million, and 5 CD loans totaling \$18.2 million. Based on loan volume, examiners weighted home mortgage and small business lending equally, which carry more weight than small loans to farms in determining the Lending Test rating.

The examiners contacted three local nonprofit organizations and discussed area community development needs. According to the community contacts, the communities need specialized loan products for low- and moderate-income people and assistance for local community development organizations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW MEXICO

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of New Mexico is rated Outstanding, based on excellent lending activity, excellent geographic distribution, and good borrower income distribution. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of New Mexico is excellent. Lending activity is excellent in the Albuquerque, NM MSA and New Mexico Non-MSA.

Albuquerque, NM MSA

Lending activity in the Albuquerque, NM MSA is excellent. According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 18.4 percent. The bank ranks second among 23 depository financial institutions in the assessment area, which places it in the top 9 percent of institutions. Based on aggregate mortgage lending data for 2016, the bank has a market share of 2 percent based on the number of home mortgage loans originated or purchased. The bank ranks ninth among 339 home mortgage lenders, which places it in the top 3 percent of lenders competing for loans in the assessment area. According to peer small business data for 2016, the bank has a 5.4 percent market share based on the number of small loans to businesses originated or purchased. The bank ranks sixth among 102 small business lenders, which places the bank in the top 6 percent of lenders. According to peer

farm data for 2016, the bank has a market share of 18.7 percent based on the number of small loans to farms originated or purchased. The bank ranks third among 16 farm lenders, which places it in the top 19 percent of lenders. Considering the bank’s higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

New Mexico Non-MSA

Lending activity in the New Mexico Non-MSA is excellent. According to FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 13.2 percent. The bank ranks third among six depository financial institutions, which places it in the 50th percentile of institutions. Based on aggregate mortgage lending data for 2016, the bank has a market share of 0.5 percent based on the number of home mortgage loans originated or purchased. The bank ranks 37th among 77 home mortgage lenders, which places it in the top 49 percent of lenders. According to peer small business data for 2016, the bank has a 4 percent market share based on the number of small loans to businesses originated or purchased. The bank ranks seventh among 28 small business lenders, which places the bank in the top 25 percent of lenders. The bank originated or purchased too few small loans to farms for any meaningful analysis. Considering the bank’s higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: NEW MEXICO						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Albuquerque, NM	69.96	5,020	795,436	5,068	177,198	55	694	4	14,338	10,147	987,666	75.39
New Mexico Non-MSA	1.36	53	6,392	143	1,743	1	5	0	0	197	8,140	1.81
Limited Review												
Farrington, NM	5.95	315	45,106	529	11,001	19	161	0	0	863	56,268	3.31
Las Cruces, NM	8.01	599	83,470	543	9,654	19	130	0	0	1,161	93,254	5.93
Santa Fe, NM	14.72	933	275,219	1,199	28,541	2	20	1	3,900	2,135	307,680	13.57
NEW MEXICO	100.00	6,920	1,205,623	7,482	228,137	96	1,010	5	18,238	14,503	1,453,008	100.00
(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area. (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016. (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.												

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of home mortgage loans.

The overall geographic distribution of home mortgage loans is excellent. The distribution is excellent in the Albuquerque, NM MSA and New Mexico Non-MSA.

Albuquerque, NM MSA

The geographic distribution of home mortgage loans in the Albuquerque, NM MSA is excellent. The bank’s home mortgage lending is excellent in low-income census tracts and good in moderate-income census tracts. The distribution of the bank’s home mortgage loans in low-income geographies at 2.5 percent is slightly higher than the 2.2 percent of owner-occupied housing units in low-income geographies and the 1.7 percent performance for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 19.6 percent is lower than the 27.7 percentage of owner-occupied housing units in moderate-income geographies, but is higher than the 18.9 percent performance for aggregate lenders.

New Mexico Non-MSA

The geographic distribution of home mortgage loans in the New Mexico Non-MSA is excellent. The bank’s home mortgage lending is excellent in low-income and good in moderate-income census tracts. The distribution of the bank’s home mortgage loans in low-income geographies at 9.1 percent exceeds the 3.5 percent of owner-occupied housing units in low-income geographies and the 4.6 percent performance for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 40.9 percent is significantly lower than the 65.3 percent of owner-occupied housing units in moderate-income geographies, but it exceeds the 37 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Albuquerque NM MSA	1,932	304,862	70.8	27,653	2.2	2.5	1.7	27.7	19.6	18.9	35.3	36.1	35.5	34.7	41.8	43.9	0.0	0.0	0.0
LS Farmington NM MSA	122	17,043	4.5	2,066	5.5	0.0	0.3	9.8	1.6	2.6	65.6	66.4	67.0	19.1	32.0	30.1	0.0	0.0	0.0
LS Las Cruces NM MSA	231	28,613	8.5	5,121	4.6	5.2	2.8	31.6	20.8	13.1	18.1	20.3	20.6	45.7	53.7	63.5	0.0	0.0	0.0
LS Santa Fe NM MSA	420	132,578	15.4	4,171	3.4	2.1	2.8	20.9	11.7	12.5	34.3	31.9	34.9	41.4	54.3	49.7	0.0	0.0	0.0
FS New Mexico Non-MSA	22	2,436	0.8	373	3.5	9.1	4.6	65.3	40.9	37.0	18.5	9.1	17.7	12.7	40.9	40.8	0.0	0.0	0.0
Total	2,727	485,532	100.0	39,384	3.0	2.6	1.9	27.2	17.9	16.8	35.0	35.3	35.0	34.8	44.3	46.3	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Albuquerque, NM MSA and New Mexico Non-MSA.

Albuquerque, NM MSA

The geographic distribution of small loans to businesses Albuquerque, NM MSA is excellent overall. The distribution is excellent in low-income geographies and excellent in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 6.4 percent is higher than the 6.2 percent of businesses operating in low-income geographies and the 5.7 percent performance for aggregate lenders. The proportion of the bank’s small loans to businesses in moderate-income geographies at 24.7 percent is lower than the 26.6 percent of businesses operating in moderate-income geographies, but is slightly higher than the 24.1 percent performance for aggregate lenders.

New Mexico Non-MSA

The geographic distribution of small loans to businesses New Mexico Non-MSA is excellent. The distribution is excellent in low-income geographies and excellent in moderate-income geographies. The proportion of the bank’s small loans to businesses in low-income geographies at 9.1 percent is equal to the 9.1 percent of businesses operating in low-income geographies and it exceeds the 6.7 percent performance for aggregate lenders. The proportion of the bank’s small loans to businesses in moderate-income geographies at 57.1 percent is greater than the 55.2 percent of businesses operating in moderate-income geographies and the 49.5 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Albuquerque NM MSA	3,026	95,583	67.5	17,242	6.2	6.4	5.7	26.6	24.7	24.1	34.3	32.1	31.2	32.9	36.8	39.0	0.0	0.0	0.0
LS Farmington NM MSA	296	4,711	6.6	1,348	1.5	0.0	0.5	11.5	8.4	11.2	65.5	65.9	59.7	21.5	25.7	28.6	0.0	0.0	0.0
LS Las Cruces NM MSA	333	4,843	7.4	2,150	8.9	7.5	6.9	26.9	22.5	27.3	17.9	20.1	17.2	46.2	49.9	48.6	0.0	0.0	0.0
LS Santa Fe NM MSA	748	15,063	16.7	3,596	9.3	11.0	8.0	10.9	14.2	10.2	41.8	34.4	38.9	37.9	40.5	42.9	0.1	0.0	0.0
FS New Mexico Non-MSA	77	935	1.7	479	9.1	9.1	6.7	55.2	57.1	49.5	11.9	6.5	10.4	23.8	27.3	33.4	0.0	0.0	0.0
Total	4,480	121,135	100.0	24,815	6.7	6.9	5.9	23.6	22.3	22.2	35.5	33.4	32.2	34.1	37.5	39.7	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to farms.

The overall geographic distribution of small loans to farms is excellent, based on excellent distribution in the Albuquerque, NM MSA.

Albuquerque, NM MSA

The geographic distribution of small loans to farms in the Albuquerque, NM MSA is excellent overall. The distribution is excellent in low-income geographies and moderate-income geographies. The proportion of the bank’s small loans to farms in low-income geographies at 5.9 percent exceeds the 3.3 percent of farms in low-income geographies and the 3.5 percent performance for aggregate lenders. The bank’s proportion of small loans to farms in moderate-income geographies at 45.5 percent exceeds the 25.9 percent of farms in moderate-income geographies and 44.7 percent performance for aggregate lenders.

New Mexico Non-MSA

The bank did not originate or purchase sufficient volumes of small loans to farms in the New Mexico Non-MSA to provide any meaningful analysis.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2014-16**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Albuquerque NM MSA	33	419	70.8	85	3.3	5.9	3.5	25.9	45.5	44.7	37.2	18.2	28.2	33.6	33.3	23.5	0.0	0.0	0.0
LS Farmington NM MSA	11	85	23.3	16	0.9	0.0	0.0	4.9	0.0	6.3	59.3	70.0	68.8	34.9	36.4	25.0	0.0	0.0	0.0
LS Las Cruces NM MSA	12	65	21.4	40	4.3	0.0	0.0	43.5	41.7	57.5	12.6	0.0	5.0	39.6	58.3	37.5	0.0	0.0	0.0
LS Santa Fe NM MSA	0	0	0.0	16	5.0	0.0	0.0	12.7	0.0	6.3	34.9	0.0	37.5	47.5	0.0	56.3	0.0	0.0	0.0
FS New Mexico Non-MSA	0	0	0.0	5	0.0	0.0	0.0	37.5	0.0	100.0	2.5	0.0	0.0	60.0	0.0	0.0	0.0	0.0	0.0
Total	56	569	100.0	162	3.6	4.2	1.9	25.8	35.7	42.0	33.1	23.2	26.5	37.5	39.3	29.6	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Albuquerque, NM MSA and adequate in the New Mexico Non-MSA.

Albuquerque, NM MSA

The bank's distribution of home mortgage loans by borrower income in the Albuquerque, NM MSA is good overall. The distribution is adequate to low-income borrowers and excellent to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income families at 9.5 percent is significantly lower than the 22.2 percent of low-income families, yet higher than the 6.1 percent performance for aggregate lenders. The proportion of home mortgage loans to moderate-income families at 18.9 percent exceeds the 17.9 percent of moderate-income families and the 17.5 percent performance for aggregate lenders.

New Mexico Non-MSA

The bank's distribution of home mortgage loans by borrower income in the New Mexico Non-MSA is adequate overall. The distribution is very poor to low-income borrowers and excellent to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income families at 0 percent is significantly lower than the 30.3 percent of low-income families and the 4.6 percent performance for aggregate lenders. The proportion of home mortgage loans to moderate-income families at 18.2 percent is slightly lower than the proportion of moderate-income families at 19.0 percent, but is higher than the 9.9 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Albuquerque NM MSA	1,932	304,862	70.8	27,653	22.2	9.5	6.1	17.9	18.9	17.5	19.2	18.9	19.3	40.8	39.6	37.4	0.0	13.0	19.7
LS Farmington NM MSA	122	17,043	4.5	2,066	23.9	10.7	3.1	15.8	19.7	13.4	18.0	19.7	19.9	42.3	39.3	39.7	0.0	10.7	23.8
LS Las Cruces NM MSA	231	28,613	8.5	5,121	25.1	5.6	2.5	16.5	18.2	8.6	16.3	19.0	18.9	42.1	48.5	48.2	0.0	8.7	21.8
LS Santa Fe NM MSA	420	132,578	15.4	4,171	23.6	9.3	5.1	16.1	11.7	14.1	18.9	17.4	20.0	41.4	53.8	46.5	0.0	7.9	14.4
FS New Mexico Non-MSA	22	2,436	1.0	373	30.3	0.0	4.6	19.0	18.2	9.9	18.2	25.0	19.0	32.5	55.0	49.3	0.0	18.2	17.2
Total	2,727	485,532	100.0	39,384	23.2	9.1	5.4	17.3	17.7	15.7	18.6	18.7	19.4	40.9	42.6	40.0	0.0	11.8	19.6

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 36 percent of its small loans to businesses. The distribution is good in the Albuquerque, NM MSA and the New Mexico Non-MSA.

Albuquerque, NM MSA

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Albuquerque, NM MSA is good. The proportion of the bank’s small loans to businesses at 53 percent is lower than the 78.8 percent of businesses with gross annual revenues of \$1 million or less. However, considering that the bank’s distribution exceeds the 44.1 percent performance for aggregate lenders, overall performance is good.

New Mexico Non-MSA

The bank’s distribution of small loans to businesses with gross annual revenues of \$1 million or less in the New Mexico Non-MSA is good. The proportion of the bank’s small loans to businesses at 48.1 percent is lower than the 66.5 percent of businesses with gross annual revenues of \$1 million or less. However, considering the bank’s distribution exceeds the 44.3 percent performance for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Albuquerque NM MSA	3,026	95,583	67.5	17,242	78.8	53.0	44.1	4.9	12.2	16.3	34.8
LS Farmington NM MSA	296	4,711	8.2	1,348	73.8	43.6	38.5	5.9	12.8	20.3	43.6
LS Las Cruces NM MSA	333	4,843	7.4	2,150	75.8	55.9	45.5	4.6	13.2	19.6	30.9
LS Santa Fe NM MSA	748	15,063	16.7	3,596	80.1	54.0	49.1	3.8	7.6	16.1	38.4
FS New Mexico Non-MSA	77	935	1.7	479	66.5	48.1	44.3	6.2	6.5	27.3	45.5
Total	4,480	121,135	100.0	24,815	78.0	52.7	44.6	4.8	11.5	17.2	35.9

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate, based on the adequate distribution in the Albuquerque, NM MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 41 percent of its small loans to farms.

Albuquerque, NM MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Albuquerque, NM MSA is adequate. Approximately 51.5 percent of the bank’s small loans were to farms with gross annual revenues of \$1 million or less. The bank’s proportion is lower than the 96.2 percent of farms with gross annual revenues of \$1 million or less, which indicates poor performance. However, considering the bank’s proportion of loans is close to the 54.1 percent performance for aggregate lenders, overall performance is adequate.

New Mexico Non-MSA

The bank did not originate or purchase sufficient volumes of small loans to farms in the New Mexico Non-MSA to provide any meaningful analysis.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Albuquerque NM MSA	33	419	58.9	85	96.2	51.5	54.1	2.3	8.3	1.5	42.4
LS Farmington NM MSA	11	85	31.6	16	97.4	72.7	68.8	2.1	16.7	0.5	20.0
LS Las Cruces NM MSA	12	65	28.1	40	90.8	55.6	45.0	7.3	0.0	1.9	58.3
LS Santa Fe NM MSA	0	0	0.0	16	98.0	0.0	56.3	1.6	0.0	0.5	0.0
FS New Mexico Non-MSA	0	0	0.0	5	97.5	0.0	80.0	2.5	0.0	0.0	0.0
Total	56	569	100.0	162	95.5	53.6	54.3	3.1	7.0	1.3	41.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect overall on the bank’s Lending Test performance in the state of New Mexico.

Albuquerque, NM MSA

CD lending has a neutral effect on the bank’s Lending Test performance in the Albuquerque, NM MSA. During the evaluation period, the bank originated four CD loans totaling \$14.3 million that helped provide 91 units of affordable housing within the assessment area. CD lending represents 4.2 percent of the allocated Tier 1 Capital. The bank met the community’s credit needs primarily through retail lending.

Examples of CD loans include:

- The bank originated a \$7.4 million loan to construct a 71-unit mixed-income multifamily housing development in Albuquerque, NM. Unit income restrictions are as follows, 15 units at 30 percent of area median income (AMI), 17 units at 40 percent of AMI, 17 units at 50 percent of AMI, 21 market rate units, and 1 unrestricted manager unit.
- The bank originated a \$2.6 million loan to finance the construction of 21 modular single-family residences. Upon completion, the developer will sell all of the homes to low- and moderate-income families earning less than 80 percent of the AMI.

- The bank originated a \$2.5 million loan to finance the construction of 21 modular single-family residences. Upon completion, the developer will sell all of the homes to low- and moderate-income families earning less than 80 percent of AMI.

New Mexico Non-MSA

CD lending has a negative effect on the bank's Lending Test performance in the New Mexico Non-MSA. The bank originated no CD loans during the evaluation period.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of New Mexico, lending under the MHA and HARP programs accounted for 88 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Las Cruces, NM MSA and Santa Fe, NM MSA is consistent with the bank's overall Outstanding performance under the Lending Test in the state of New Mexico. Performance in the Farmington, NM MSA is weaker than the overall Outstanding Lending Test performance primarily due to the weaker geographic distribution of loans and limited level of CD lending.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of New Mexico is rated High Satisfactory. Investment performance is excellent in the Albuquerque, NM MSA and adequate in the New Mexico Non-MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Albuquerque, NM MSA

In the Albuquerque, NM MSA, Bank of America has an excellent level of CD investments. The bank made 92 community development investments during the current evaluation period totaling \$35.6 million. Approximately \$35 million or 99 percent of the current period investment dollars supported 192 units of affordable housing. In addition, the bank has 65 community development investments totaling \$5.8 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Outstanding prior period and current period investments total \$41.4 million or 12.3 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$24 million or 67 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$12.2 million in a LIHTC to finance the construction of a 68-unit apartment complex located in Albuquerque, NM. Of the units to be constructed, 56 units are restricted to renters with incomes at or below 60 percent of the area median income (AMI).
- The bank invested \$11.8 million in a LIHTC to finance the construction of a 71-unit mixed-income multifamily housing development in Albuquerque, NM. Unit income restrictions are as follows, 15 units at 30 percent of the AMI, 17 units at 40 percent of the AMI, 17 units at 50 percent of the AMI, 21 market rate units, and 1 unrestricted manager unit.
- The bank invested \$319,000 in commercial mortgage-backed securities (CMBS) backed by pools of multifamily mortgage loans. A 120-unit multifamily affordable housing development with 48 units that are income restricted to at or below 60 percent of AMI secures this transaction.

New Mexico Non-MSA

Bank of America's performance under the Investment Test in the New Mexico Non-MSA is adequate. The bank made seven community development investments during the current evaluation period totaling \$202,000. Approximately \$190,000 or 94 percent of the current period investment dollars supported two units of affordable housing. In addition, the bank has one community development investment totaling \$293,000 made during a prior evaluation period that is still outstanding and continues to provide benefit to the community. Outstanding prior period and current period investments total \$495,000 or 6.1 percent of the bank's Tier 1 Capital allocated to the assessment area.

Table 14. Qualified Investments								2012-2016	
QUALIFIED INVESTMENTS		Geography: NEW MEXICO				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Albuquerque, NM	65	5,758	92	35,621	157	41,379	72.15	1	468
New Mexico Non-MSA	1	293	7	202	8	495	0.86	0	0
Limited Review									
Farmington, NM	8	259	14	580	22	839	1.46	0	0
Las Cruces, NM	8	267	22	746	30	1,013	1.77	0	0
Santa Fe, NM	5	109	16	2,103	21	2,211	3.86	0	0
NEW MEXICO - Statewide	0	0	26	280	26	280	0.49	0	0
NEW MEXICO - Non Assessed	17	5,174	31	5,961	48	11,135	19.42	0	0
NEW MEXICO	104	11,860	208	45,493	312	57,352	100.00	1	468
(*) '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 bank's financial reporting system.									

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Farmington, NM MSA, Las Cruces, NM MSA, and Santa Fe, NM MSA is weaker than the bank's overall High Satisfactory performance under the Investment Test in the state of New Mexico. Performance is weaker primarily due to lower levels of CD investments relative to the bank's capacity in those assessment areas.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of New Mexico is rated Outstanding. Service Test performance is excellent in the Albuquerque, NM MSA and New Mexico Non-MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Albuquerque, NM MSA

BANA's service delivery systems in the Albuquerque, NM MSA are readily accessible to geographies and individuals of different income levels, based on a comparison of the bank's 18 financial centers in each tract income category with the distribution of the population in those same tract categories. The bank has two financial centers in low-income geographies representing 11.1 percent of its financial centers. Considering 4.5 percent of the population lives in low-income geographies, financial center distribution in low-income geographies is excellent. The bank has five financial centers in moderate-income geographies representing

27.8 percent of its financial centers. Considering 31.7 percent of the population lives in moderate-income geographies, financial center distribution in moderate-income geographies is good.

Examiners also considered the bank’s alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking were considered in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The proportion of customers in low- and moderate-income geographies using the various ADS platforms compares favorably to the proportion of individuals living in low- and moderate-income geographies.

The bank has three financial centers in middle- and upper-income geographies that are adjacent to or are in very close proximity to low- and moderate-income geographies. These adjacent financial centers further improve access of service delivery systems to low- and moderate-income individuals and geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank closed five financial centers, including three in moderate-income geographies and two in middle-income geographies. Despite these closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment areas, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial center lobby hours are primarily 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm Friday, and 9:00 am to 1:00 pm Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Albuquerque NM MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	10	4.9	39,561	4.5	2	11.1	5	9.1	0	0.0	0	0.0
Moderate	58	28.6	281,405	31.7	5	27.8	14	25.5	0	0.0	3	60.0
Middle	72	35.5	298,454	33.6	8	44.4	22	40.0	0	0.0	2	40.0
Upper	62	30.5	267,657	30.2	3	16.7	14	25.5	0	0.0	0	0.0
NA	1	0.5	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	203	100.0	887,077	100.0	18	100.0	55	100.0	0	100.0	5	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

New Mexico Non-MSA

BANA’s service delivery systems in the New Mexico Non-MSA are readily accessible to geographies and individuals of different income levels, based on a comparison of the bank’s financial centers in each tract income category to the distribution of the population in those same tract categories. The bank has no financial centers in low-income geographies. Its sole financial center is located in a moderate-income geography.

Examiners also considered the bank’s alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking were considered in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a neutral effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank closed one financial center in a middle-income geography.

Banking products, services, and hours of operations do not vary in a way that inconveniences the assessment areas, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours for the single branch are 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm Friday, and 9:00 am to 1:00 pm Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS New Mexico Non-MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	1	5.9	3,186	4.5	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	11	64.7	49,705	69.5	1	100.0	6	85.7	0	0.0	0	0.0
Middle	3	17.6	11,683	16.3	0	0.0	1	14.3	0	0.0	1	100.0
Upper	2	11.8	6,918	9.7	0	0.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	17	100.0	71,492	100.0	1	100.0	7	100.0	0	100.0	1	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Albuquerque, NM MSA

The bank provides a relatively high level of community development services within the Albuquerque, NM MSA. During the evaluation period, the bank participated with community development organizations to provide 90 community development services targeted to low- and moderate-income individuals. Employees provided 19 financial education workshops and 46 foreclosure prevention workshops for 580 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 18 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, seven employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

New Mexico Non-MSA

The bank provides a limited level of community development services within the New Mexico Non-MSA. During the evaluation period, the bank participated with community development organizations to provide five community development services targeted to low- and moderate-income individuals. Employees provided five financial education workshops for 40 individuals

that were primarily from low- and moderate-income families. No employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Las Cruces, NM MSA and Santa Fe, NM MSA is consistent with the bank's overall Outstanding performance under the Service Test in New Mexico. Performance in the Farmington, NM MSA is weaker than the overall Outstanding performance for the state of New Mexico due to the lack of any financial centers in low- or moderate-income geographies.

State of New York

CRA Rating for New York	Outstanding
The Lending Test is rated:	<u>Outstanding</u>
The Investment Test is rated:	<u>Outstanding</u>
The Service Test is rated:	<u>High Satisfactory</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Excellent distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- High level of CD lending that has a significantly positive effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in the State of New York

The state of New York is Bank of America's 24th largest rating area based on its total deposits in the state when excluding deposits in the New York-Newark-Jersey City, NY-NJ Multistate MSA. Examiners excluded the multistate MSA from the analysis of the state of New York because examiners evaluated the multistate MSA as a separate rating area. As of June 30, 2016, the bank maintained approximately \$7.1 billion or 0.6 percent of its total domestic deposits in financial centers in areas of the state of New York that do not include the New York-Newark-Jersey City, NY-NJ Multistate MSA. Of the 89 depository financial institutions operating in the areas of the state that do not include the multistate MSA, Bank of America, with a deposit market share of 5.3 percent, is the fourth largest. The bank's primary banking competitors for deposits in the state of New York with deposit shares greater than 5 percent include Manufacturers and Traders Trust Company (26.2 percent), KeyBank (12.6 percent), First Niagara Bank (12.6 percent), and Citizens Bank (5.1 percent). As of December 31, 2016, BANA operated 73 financial centers and 135 full service ATMs in the areas of the state of New York that do not include the multistate MSA.

Refer to the community profiles for the state of New York in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New York

Examiners selected three assessment areas for full-scope reviews and the remaining five assessment areas for limited-scope reviews. The full-scope assessment areas were the Buffalo-Cheektowaga-Niagara Falls, NY MSA, Kingston, NY MSA, and Syracuse, NY MSA. Examiners based the conclusions and ratings on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 8,238 home mortgage loans totaling \$1.3 billion, 24,492 small loans to businesses totaling \$889.8 million, 432 small loans to farms totaling \$5.2 million, and 44 CD loans totaling \$256 million. Lending volumes include loans originated or purchased in the Glenn Falls, NY MSA and the counties of Columbia, Greene, Fulton, Montgomery, and Sullivan, which the bank no longer designates as assessment areas due to the bank's closure or sale of all financial centers and deposit-taking ATMs in those communities. In addition, the lending volumes include loans originated or purchased in the Poughkeepsie-Newburgh-Middletown, NY prior to the MSA's inclusion in the New York-Newark-Jersey City, NY-NJ Multistate MSA in 2014. Based on loan volume, examiners weighted small loans to businesses, representing 74 percent of the volume, the most followed by home mortgage lending at 25 percent, and small loans to farms at 1.3 percent.

Examiners conducted telephone interviews with five local community service agencies representing neighborhood housing, employment, and community service needs. The organizations identified the following as needs across the state:

- Commercial office space
- Development in city neighborhoods outside of downtown areas
- Higher income jobs
- Affordable housing construction
- Affordable home mortgage loan products that comply with qualified mortgage requirements
- Rehabilitation of vacant properties, especially those with structural issues
- Neighborhood revitalization and stabilization in LMI communities
- Language assistance in purchasing homes
- Post home ownership counseling
- Non-profit assistance for first-time homebuyer programs
- Small business capital loans
- Small dollar lending
- Low cost and/or free checking

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

Conclusions in the Area Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of New York is rated Outstanding, based on excellent lending activity, excellent geographic distribution, and good

borrower income distribution. CD lending has a significantly positive effect on the Lending Test rating. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of New York is excellent. Lending activity is excellent in the Buffalo-Cheektowaga-Niagara Falls, NY MSA, Kingston, NY MSA, and Syracuse, NY MSA.

Buffalo-Cheektowaga-Niagara Falls, NY MSA

Lending activity in the Buffalo-Cheektowaga-Niagara Falls, NY MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 5.1 percent. The bank ranks fourth among 16 depository financial institutions in the assessment area, which places it in the top 25 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.9 percent based on the number of home mortgage loans originated or purchased. The bank ranks 12th among 261 home mortgage lenders, which places it in the top 5 percent of lenders competing for loans. According to peer small business data for 2016, the bank has a 9 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks third among 101 small business lenders, which places it in the top 3 percent of lenders in the MSA. For small loans to farms, the bank has a market share of 6.1 percent based on the number of small loans to farms originated or purchased. The bank ranks fifth among 17 farm lenders, which places it in the top 30 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

Kingston, NY MSA

Lending activity in the Kingston, NY MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 13.1 percent. The bank ranks second among 21 depository financial institutions in the assessment area, which places it in the top 10 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1 percent based on the number of home mortgage loans originated or purchased. The bank ranks 21st among 187 home mortgage lenders, which places it in the top 12 percent of lenders competing for loans. According to peer small business data for 2016, the bank has a market share of 11.3 percent of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks second among 65 small business lenders, which places it in the top 4 percent of lenders in the MSA. According to peer farm data for 2016, the bank has a market share of 32.3 percent based on the number of small loans to farms originated or purchased. The bank ranks first among 10 farm lenders, which places it in the top 10 percent of lenders. Considering the bank's higher ranking among all lenders for small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

Syracuse, NY MSA

Lending activity in the Syracuse, NY MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 14.8 percent. The bank ranks second among 16 depository financial institutions in the assessment area, which places it in the top 13 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 0.9 percent based on the number of home mortgage loans originated or purchased. The bank ranks 27th among 214 home mortgage lenders, which places it in the top 13 percent of lenders competing for loans. According to peer small business data for 2016, the bank has a 6.1 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks seventh among 92 small business lenders, which places it in the top 8 percent of lenders in the MSA. For small loans to farms, the bank has a market share of 11.8 percent based on the number of small loans to farms originated or purchased. The bank ranks fourth among 19 farm lenders, which places it in the top 22 percent of lenders. Considering the bank's ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: NEW YORK						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Buffalo, NY	23.20	2,153	314,002	5,495	227,845	43	876	12	36,029	7,703	578,752	30.66
Kingston, NY	5.99	236	47,487	1,716	37,022	26	307	10	2,904	1,988	87,720	5.61
Syracuse, NY	11.72	945	113,698	2,883	77,175	59	736	4	71,807	3,891	263,416	25.54
Limited Review												
Albany, NY	21.29	1,480	277,598	5,505	249,047	75	966	10	112,625	7,070	640,236	25.35
Glens Falls, NY	1.40	177	37,500	276	7,314	11	51	0	0	464	44,865	0.00
Ithaca, NY	1.23	48	7,971	355	6,462	4	26	0	0	407	14,459	0.00
Poughkeepsie, NY	6.30	729	183,024	1,345	49,189	16	97	1	667	2,091	232,977	0.00
Rochester, NY	20.00	1,766	258,217	4,750	169,007	122	1,641	4	1,660	6,642	430,525	11.93
Utica, NY	4.23	327	31,598	1,037	32,712	38	242	1	23,662	1,403	88,214	0.00
New York Non-MSA	4.66	377	61,041	1,130	34,073	38	217	2	6,633	1,547	101,964	0.91
NEW YORK	100.00	8,238	1,332,136	24,492	889,846	432	5,159	44	255,987	33,206	2,483,128	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The overall geographic distribution of home mortgage loans is excellent. The distribution is good in the Buffalo-Cheektowaga-Niagara Falls, NY MSA and excellent in the Kingston, NY MSA and Syracuse, NY MSA.

Buffalo-Cheektowaga-Niagara Falls, NY MSA

The geographic distribution of home mortgage loans in the Buffalo-Cheektowaga-Niagara Falls, NY MSA is good. The distribution of the bank's home mortgage lending is good in both low- and moderate-income geographies. The distribution of the bank's home mortgage loans in low-income geographies at 3.6 percent is lower than the 5 percent of owner-occupied housing units in low-income geographies, but it is higher than the 2.5 percent performance of aggregate lenders. The distribution in moderate-income geographies at 11.4 percent is lower than the 14.3 percent of owner-occupied housing units in moderate-income geographies, and it is higher than the 11 percent performance for aggregate lenders.

Kingston, NY MSA

The geographic distribution of home mortgage loans in the Kingston, NY MSA is excellent. The distribution of the bank's home mortgage lending is excellent in moderate-income geographies. Because there are no low-income census tracts, examiners based the conclusion for this MSA on the performance in moderate-income geographies. The distribution in moderate-income geographies at 9.8 percent is slightly lower than the 10.4 percent of owner-occupied housing units in moderate-income geographies, and it is higher than the 8.6 percent performance for aggregate lenders.

Syracuse, NY MSA

The geographic distribution of home mortgage loans in the Syracuse, NY MSA is excellent. The distribution of the bank's home mortgage lending is excellent in both low- and moderate-income geographies. The distribution of the bank's home mortgage loans in low-income geographies at 4 percent is higher than the 3.3 percent of owner-occupied housing units in low-income geographies and higher than the 2.2 percent performance of aggregate lenders. The distribution in moderate-income geographies at 13.7 percent is higher than the 13.6 percent of owner-occupied housing units in moderate-income geographies and it is higher than the 12.5 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Buffalo-Cheektowaga-Niagara Falls NY MSA	1,100	175,500	32.8	23,954	5.0	3.6	2.5	14.3	11.4	11.0	43.1	36.8	43.8	37.7	48.2	42.7	0.0	0.0	0.0
FS Kingston NY MSA	102	20,370	3.0	3,128	0.0	0.0	0.0	10.4	9.8	8.6	74.4	73.5	75.6	15.2	16.7	15.8	0.0	0.0	0.0
FS Syracuse NY MSA	423	54,664	12.6	15,482	3.3	4.0	2.2	13.6	13.7	12.5	49.2	42.1	47.4	34.0	40.2	37.9	0.0	0.0	0.0
LS Albany-Schenectady-Troy NY MSA	668	132,169	19.9	21,879	4.4	3.7	3.2	11.3	9.1	9.5	56.6	53.4	57.2	27.8	33.7	30.2	0.0	0.0	0.0
LS Ithaca NY MSA	17	2,353	0.5	1,623	0.2	0.0	0.2	15.7	23.5	13.2	62.4	58.8	63.5	21.6	17.6	22.6	0.0	0.0	0.4
LS New York Non-MSA	58	7,951	1.7	1,182	0.0	0.0	0.0	7.0	10.3	9.0	64.8	67.2	62.7	28.2	22.4	28.3	0.0	0.0	0.0
LS Rochester NY MSA	862	136,425	25.7	28,034	3.1	3.6	2.1	10.6	7.0	9.0	57.1	51.3	57.4	29.2	38.1	31.5	0.0	0.1	0.0
LS Ulica-Rome NY MSA	124	11,980	3.7	6,603	2.9	0.8	2.4	8.8	10.5	8.2	60.0	57.3	58.4	28.2	31.5	30.9	0.0	0.0	0.0
Total	3,354	541,412	100.0	101,885	3.6	3.4	2.3	12.1	10.0	10.1	53.2	47.0	53.4	31.1	39.5	34.1	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is good in the Buffalo-Cheektowaga-Niagara Falls, NY MSA and Kingston, NY MSA and excellent in the Syracuse, NY MSA.

Buffalo-Cheektowaga-Niagara Falls, NY MSA

The geographic distribution of small loans to businesses in the Buffalo-Cheektowaga-Niagara Falls, NY MSA is good. Performance is adequate in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 6.1 percent is lower than the 8 percent of businesses in low-income geographies and it is lower than the 7 percent performance for aggregate lenders. The distribution in moderate-income geographies at 12.8 percent is lower than the 14.6 percent of businesses in moderate-income geographies and it is lower than the 13.8 percent performance for aggregate lenders.

Kingston, NY MSA

The geographic distribution of small loans to businesses in the Kingston, NY is good. Because there are no low-income census tracts, examiners based the conclusion on the bank’s performance in moderate-income geographies. The distribution in moderate-income geographies at 11.2 percent is lower than the 13.2 percent of businesses in moderate-income geographies, and slightly higher than the 11.1 percent performance for aggregate lenders.

Syracuse, NY MSA

The geographic distribution of small loans to businesses in Syracuse, NY MSA is excellent. Performance is excellent in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 14.7 percent is higher than the 13.3 percent of businesses in low-income geographies and it is higher than the 11.4 percent performance for aggregate lenders. The distribution in moderate-income geographies at 12.1 percent is lower than the 14.1 percent of businesses in moderate-income geographies and it is lower than the 12.5 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Busines	% Bank Loans	Aggre gate	% Busines	% Bank Loans	Aggre gate	% Busines	% Bank Loans	Aggre gate	% Busines	% Bank Loans	Aggre gate	% Busines	% Bank Loans	Aggre gate
FS Buffalo-Cheektowaga-Niagara Falls NY MSA	3,550	138,912	25.7	14,981	8.0	6.1	7.0	14.6	12.8	13.8	40.9	39.0	38.6	36.0	41.9	40.5	0.4	0.1	0.1
FS Kingston NY MSA	1,106	21,209	8.0	3,517	0.0	0.0	0.0	13.2	11.2	11.1	69.7	73.0	70.8	17.1	15.8	18.1	0.0	0.0	0.0
FS Syracuse NY MSA	1,733	43,728	12.6	9,663	13.3	14.7	11.4	14.1	12.1	12.5	43.5	39.6	46.0	29.1	33.6	30.1	0.0	0.0	0.0
LS Albany-Schenectady-Troy NY MSA	3,485	152,449	25.2	12,777	7.4	7.5	6.8	15.5	11.8	12.8	50.6	47.2	51.5	26.5	33.5	29.0	0.0	0.0	0.0
LS New York Non-MSA	246	5,860	1.8	967	0.0	0.0	0.0	12.7	10.6	8.6	66.0	61.0	66.1	21.3	28.5	25.3	0.0	0.0	0.0
LS Ithaca NY MSA	207	3,066	1.5	1,605	0.2	1.4	0.7	24.7	18.4	23.1	47.4	41.1	49.3	27.3	39.1	26.8	0.3	0.0	0.1
LS Rochester NY MSA	3,000	103,300	21.7	16,606	9.2	8.6	7.6	11.0	8.3	8.9	50.9	47.1	51.3	28.7	36.0	32.1	0.2	0.1	0.1
LS Utica-Rome NY MSA	479	12,873	3.5	3,752	4.6	3.3	4.6	13.6	13.2	14.1	54.8	53.9	50.5	25.5	29.0	29.6	1.5	1.0	1.2
Total	13,806	481,397	100.0	63,868	8.1	7.3	7.0	13.9	11.4	12.1	48.4	46.6	48.8	29.3	34.7	32.0	0.3	0.1	0.1

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data: 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to farms.

The overall geographic distribution of small loans to farms is adequate. The distribution is poor in the Buffalo-Cheektowaga-Niagara Falls, NY MSA and Kingston, NY MSA and it is excellent in the Syracuse, NY MSA.

Buffalo-Cheektowaga-Niagara Falls, NY MSA

The geographic distribution of small loans to farms in the Buffalo-Cheektowaga-Niagara Falls, NY MSA is poor. Performance is poor in low-income geographies and poor in moderate-income geographies. The distribution in low-income geographies at 0 percent is lower than the 2.6 percent of farms in low-income geographies, but is consistent with the 0 percent for aggregate lenders. The distribution in moderate-income geographies at 0 percent is lower than the 5.6 percent of farms in moderate-income geographies and it is lower than the 1.2 percent performance for aggregate lenders.

Kingston, NY MSA

The geographic distribution of small loans to farms in the Kingston, NY MSA is poor. Because the Kingston, NY MSA has no low-income census tracts, the conclusion is based on performance in moderate-income geographies. Performance is poor in moderate-income geographies. The distribution in moderate-income geographies at 0 percent is lower than the 6.3 percent of farms in moderate-income geographies, but is consistent with the 0 percent performance for aggregate lenders.

Syracuse, NY MSA

The geographic distribution of small loans to farms in the Syracuse, NY MSA is excellent. Performance is excellent in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 10.5 percent significantly exceeds the 1.8 percent of farms in low-income geographies and it is significantly higher than the 0.7 percent performance for aggregate lenders. The distribution in moderate-income geographies at 11.1 percent is higher than the 9.6 percent of farms in moderate-income geographies and it is higher than the 7.3 percent performance for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS Buffalo-Cheektow aga-Niagara Falls NY MSA	31	696	12.5	163	2.6	0.0	0.0	5.6	0.0	1.2	50.6	74.2	63.8	41.2	25.8	35.0	0.0	0.0	0.0
FS Kingston NY MSA	21	277	8.4	31	0.0	0.0	0.0	6.3	0.0	0.0	68.2	71.4	64.5	25.5	28.6	35.5	0.0	0.0	0.0
FS Syracuse NY MSA	38	600	20.9	150	1.8	10.5	0.7	9.6	11.1	7.3	58.8	52.6	72.0	29.7	31.6	20.0	0.0	0.0	0.0
LS Albany-Schenectady-Troy NY MSA	41	654	17.8	91	1.8	0.0	0.0	10.2	6.9	16.5	65.6	78.0	72.5	22.4	17.1	11.0	0.0	0.0	0.0
LS New York Non-MSA	9	42	5.5	98	0.0	0.0	0.0	1.5	0.0	0.0	60.2	55.6	46.9	38.3	44.4	53.1	0.0	0.0	0.0
LS Ithaca NY MSA	3	23	1.8	27	0.0	0.0	0.0	18.6	0.0	48.1	68.6	100.0	48.1	12.8	0.0	3.7	0.0	0.0	0.0
LS Rochester NY MSA	80	1,308	32.1	731	1.5	0.0	0.0	7.6	8.8	8.6	69.6	73.8	85.4	21.4	17.5	6.0	0.0	0.0	0.0
LS Utica-Rome NY MSA	26	151	10.4	142	0.8	0.0	0.0	2.0	0.0	0.7	78.7	76.9	86.6	18.5	23.1	12.7	0.0	0.0	0.0
Total	249	3,751	100.0	1,433	1.6	1.6	0.1	7.6	4.4	7.3	64.1	71.1	77.0	26.8	22.9	15.6	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the "Inside/Outside Ratio" section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is adequate in the Buffalo-Cheektowaga-Niagara Falls, NY MSA and Kingston, NY MSA and excellent in the Syracuse, NY MSA.

Buffalo-Cheektowaga-Niagara Falls, NY MSA

The distribution of home mortgage loans by borrower income in the Buffalo-Cheektowaga-Niagara Falls, NY MSA is adequate. The distribution is poor for low-income borrowers and good for moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 5.9 percent is lower than the 21.6 percent of low-income families and it is lower than the 7.5 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 16.5 percent is lower than the 17.4 percent of moderate-income families and it is lower than the 20.4 percent performance for aggregate lenders.

Kingston, NY MSA

The distribution of home mortgage loans by borrower income in the Kingston, NY MSA is adequate. The distribution is poor for low-income borrowers and good for moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 4.9 percent is lower than the 19.6 percent of low-income families and it is lower than the 5.7 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 15.7 percent is lower than the 17.8 percent of moderate-income families and it is lower than the 16.7 percent performance for aggregate lenders.

Syracuse, NY MSA

The distribution of home mortgage loans by borrower income in the Syracuse, NY MSA is excellent. The distribution is good for low-income borrowers and excellent for moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 13.7 percent is lower than the 21.3 percent of low-income families, but higher than the 9.1 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 21.7 percent is higher than the 17.1 percent of moderate-income families and it is higher than the 21.3 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Buffalo-Cheektowaga-Niagara Falls NY MSA	1,100	175,500	32.8	23,954	21.6	5.9	7.5	17.4	16.5	20.4	20.9	22.5	23.1	40.1	45.9	31.9	0.0	9.1	17.1
FS Kingston NY MSA	102	20,370	4.4	3,128	19.6	4.9	5.7	17.8	15.7	16.7	23.0	27.5	24.7	39.6	42.2	41.6	0.0	9.8	11.3
FS Syracuse NY MSA	423	54,664	12.6	15,482	21.3	13.7	9.1	17.1	21.7	21.3	21.5	24.1	23.4	40.0	29.3	31.9	0.0	11.1	14.3
LS Albany-Schenectady-Troy NY MSA	668	132,169	19.9	21,879	20.5	9.3	7.5	18.1	19.6	20.9	21.8	23.8	23.8	39.6	37.7	32.4	0.0	9.6	15.4
LS Ithaca NY MSA	17	2,182	1.7	1,623	19.4	17.6	4.8	18.9	11.8	17.4	20.4	11.8	23.6	41.2	41.2	46.1	0.0	17.6	8.1
LS New York Non-MSA	58	7,951	1.7	1,182	15.5	10.3	5.4	16.2	15.5	19.3	23.1	22.4	28.5	45.3	41.4	30.3	0.0	10.3	16.5
LS Rochester NY MSA	862	136,425	25.7	28,034	20.4	10.3	8.2	17.4	18.0	20.6	22.2	19.0	23.1	40.1	43.9	34.7	0.0	8.8	13.4
LS Ulrica-Rome NY MSA	124	11,980	3.7	6,603	21.1	12.9	7.6	17.3	24.2	20.3	21.4	21.8	25.2	40.3	27.4	37.8	0.0	13.7	9.1
Total	3,354	541,412	100.0	101,885	20.8	9.1	7.8	17.5	18.4	20.5	21.6	22.2	23.6	40.1	40.8	33.7	0.0	9.6	14.4

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "---" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s origination and purchase of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The distribution is good in the Buffalo-Cheektowaga-Niagara Falls, NY MSA, good in the Kingston, NY MSA, and good in the Syracuse, NY MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 37 percent of its small loans to businesses.

Buffalo-Cheektowaga-Niagara Falls, NY MSA

The distribution in the Buffalo-Cheektowaga-Niagara Falls, NY MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 52.1 percent is lower than the 74.9 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 46.4 percent for aggregate lenders, overall performance is good.

Kingston, NY MSA

The distribution in the Kingston, NY MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 55.9 percent is lower than the 80.5 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 48.6 percent for aggregate lenders, overall performance is good.

Syracuse, NY MSA

The distribution in the Syracuse, NY MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 49.9 percent is lower than the 75.2 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is stronger than the 43.9 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Buffalo-Cheektowaga-Niagara Falls NY MSA	3,550	138,912	25.7	14,981	74.9	52.1	46.4	6.7	13.9	18.4	34.0
FS Kingston NY MSA	1,106	21,209	8.0	3,517	80.5	55.9	48.6	4.0	7.2	15.6	36.9
FS Syracuse NY MSA	1,733	43,728	12.6	9,663	75.2	49.9	43.9	6.3	11.4	18.5	38.7
LS Albany-Schenectady-Troy NY MSA	3,485	152,449	25.2	12,777	74.9	48.7	46.3	5.9	13.9	19.2	37.5
LS New York Non-MSA	246	5,860	1.8	967	73.7	44.7	56.8	6.1	15.9	20.1	39.4
LS Ithaca NY MSA	207	3,066	1.6	1,605	74.4	47.3	49.8	5.5	10.1	20.1	42.5
LS Rochester NY MSA	3,000	103,300	21.7	16,606	76.1	50.1	45.2	6.3	13.5	17.6	36.4
LS Utica-Rome NY MSA	479	12,873	3.5	3,752	75.1	40.9	50.6	6.0	12.9	19.0	46.1
Total	13,806	481,397	100.0	63,868	75.5	50.2	46.3	6.2	12.9	18.3	36.9

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The distribution is adequate in the Buffalo-Cheektowaga-Niagara Falls, NY MSA and Kingston, NY MSA and poor in the Syracuse, NY MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 46 percent of its small loans to farms.

Buffalo-Cheektowaga-Niagara Falls, NY MSA

The distribution in the Buffalo-Cheektowaga-Niagara Falls, NY MSA is adequate. Based on farms with known revenues, the proportion of the bank's small loans to farms at 45.2 percent is lower than the 95.8 percent of farms with gross annual revenues of \$1 million or less. However, the distribution exceeds the 37.4 percent performance for aggregate lenders.

Kingston, NY MSA

The distribution in the Kingston, NY MSA is adequate. Based on farms with known revenues, the proportion of the bank's small loans to farms at 47.6 percent is lower than the 97.1 percent of farms with gross annual revenues of \$1 million or less. However, the distribution exceeds the 32.3 percent performance for aggregate lenders.

Syracuse, NY MSA

The distribution in the Syracuse, NY MSA is poor. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 44.7 percent is lower than the 96.4 percent of farms with gross annual revenues of \$1 million or less. The distribution is also lower than the 57.3 percent performance for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Buffalo-Cheektowaga-Niagara Falls NY MSA	31	696	12.9	163	95.8	45.2	37.4	2.9	19.0	1.2	41.9
FS Kingston NY MSA	21	277	8.4	31	97.1	47.6	32.3	2.2	0.0	0.7	52.4
FS Syracuse NY MSA	38	600	17.2	150	96.4	44.7	57.3	2.8	6.7	0.8	50.0
LS Albany-Schenectady-Troy NY MSA	41	654	17.3	91	97.0	46.3	38.5	1.7	7.7	1.3	51.2
LS New York Non-MSA	9	42	5.5	98	93.9	66.7	49.0	5.1	0.0	0.9	33.3
LS Ithaca NY MSA	3	23	1.8	27	96.0	100.0	55.6	2.4	0.0	1.6	0.0
LS Rochester NY MSA	80	1,308	37.3	731	95.9	38.8	64.4	3.0	15.0	1.1	46.3
LS Utica-Rome NY MSA	26	151	15.1	142	98.2	50.0	62.0	0.7	7.7	1.1	46.2
Total	249	3,751	100.0	1,433	96.4	45.4	56.8	2.6	8.0	1.1	46.6

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a significantly positive effect overall on the bank’s Lending Test performance in the state of New York.

Buffalo-Cheektowaga-Niagara Falls, NY MSA

In the Buffalo-Cheektowaga-Niagara Falls, NY MSA, CD lending has a significantly positive effect on the lending performance in the assessment area. The bank originated 12 CD loans totaling \$36 million that primarily support affordable housing, community services and revitalization/ stabilization. CD loans helped to finance the development of 293 units of affordable housing. CD lending represents 13.2 percent of the allocated Tier 1 Capital.

Examples of CD loans include:

- The bank provided \$10.2 million in construction financing to build the Waterfront, Phase I, a 48-unit affordable housing multi-family development in a low-income census tract. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank renewed its \$2.4 million construction loan for AD Price II, a 95-unit affordable housing development in Buffalo, NY targeted to seniors aged 55 or older. The original construction financing dates back to 2009. The development is now 98 percent occupied. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$3.5 million in financing to the Lockport City School District, through a Qualified Zone Academy Bond (QZAB), which strengthens schools serving a large

concentration of low-income families. The School District used these funds to finance energy efficient equipment installed at schools within the district.

Kingston, NY MSA

In the Kingston, NY MSA, CD lending has a neutral effect on the lending performance in the assessment area. The bank originated 10 CD loans totaling \$2.9 million that primarily support affordable housing and community services. The funds for affordable housing purposes were provided to a nationally recognized certified CDFI. The CDFI used the funds to refinance its existing non-performing loan portfolio, in which 51 percent of units in each development are affordable. The CD loans did not help to finance the development of any new units of affordable housing. CD lending represents 5.8 percent of the allocated Tier 1 Capital. The bank met the community's credit needs primarily through retail lending.

Syracuse, NY MSA

In the Syracuse, NY MSA, CD lending has a significantly positive effect on the lending performance in the assessment area. The bank originated four CD loans totaling \$71.8 million that primarily support affordable housing and community services. The bank provided similar funding to the same national CDFI described in the Kingston, NY MSA. The CD loans did not help to finance the development of any new units of affordable housing. CD lending represents 31.5 percent of the allocated Tier 1 Capital.

An example of CD loans includes:

- The bank provided \$68.4 million for cash flow gap funding for the Syracuse City School District. Approximately 74 percent of the students in the district are eligible for reduced or free lunch.

Other Lending

Bank of America issued two standby letters of credit totaling \$41.7 million dollars to support construction financing for multifamily affordable housing projects in Rochester and Syracuse, New York. While letters of credit are not reportable as CD loans, they sometimes support community development and thus receive positive consideration in the bank's CD lending performance.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Unlike in other rating areas, lending under the MHA and HARP programs accounted for only 17 percent of the dollar volume of all loans under flexible lending programs. In the state of New York, FHA loans account for 69 percent of the flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Albany-Schenectady-Troy, NY MSA, Ithaca, NY MSA, Rochester, NY MSA, Utica, NY MSA, and New York Non-MSA is consistent with the Outstanding Lending Test performance in the state of New York.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of New York is rated Outstanding. Investment performance is good in the Buffalo-Cheektowaga-Niagara Falls, NY MSA, adequate in the Kingston, NY MSA, and excellent in the Syracuse, NY MSA. Performance in limited-scope assessment areas has a positive effect on the state rating.

Buffalo-Cheektowaga-Niagara Falls, NY MSA

In the Buffalo-Cheektowaga-Niagara Falls, NY MSA, Bank of America has a good level of CD investments. The bank made 102 investments during the current evaluation period totaling \$19.4 million. Approximately \$18.7 million or 96.4 percent of the current period investment dollars in the MSA supported nearly 336 units of affordable housing. In addition, the bank has 42 CD investments totaling \$7.4 million it made during a prior evaluation period that are still outstanding and continue to benefit the community. Outstanding prior period and current period investments total \$26.7 million or 9.8 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$17.9 million or 92 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$644,000 in a fund that invests directly and indirectly in partnerships that own affordable housing projects across the U.S. The partnerships use LIHTCs to help fund the projects. This transaction represents the amount allocated to Foxwood Place, a 164-unit affordable housing development within the MSA.
- The bank invested more than \$182,000 in Resident Ownership Capital, a certified CDFI with a mission to make quality resident ownership possible by preserving and improving affordable communities, building assets for low- and moderate-income families and individuals, and supporting mutually supportive communities and leaders. As part of a larger \$2 million commitment to the CDFI, this transaction is responsive to the affordable housing needs within the MSA.
- The bank made grants to United Way of Buffalo and Erie County during the evaluation period totaling \$261,000. The investments helped to fund the organization's local

programs that provide low- and moderate-income individuals with crisis assistance benefit screening, free tax preparation, financial education, asset-building opportunities, and employment preparation.

Kingston, NY MSA

In the Kingston, NY MSA, Bank of America has an adequate level of CD investments. The bank made 22 investments during the current evaluation period totaling \$2.7 million. Approximately \$2.7 million or 99.9 percent of the current period investment dollars in the MSA supported nearly 18 units of affordable housing. In addition, the bank has 10 CD investments totaling \$481,000 it made during a prior evaluation period that are still outstanding and continue to benefit the community. Outstanding prior period and current period investments total \$3.2 million or 6.3 percent of the bank's Tier 1 Capital allocated to the assessment area. None of the current period investments are innovative or complex with mortgage-backed securities representing \$2.7 million or 100 percent of the investment dollars

Syracuse, NY MSA

In the Syracuse, NY MSA, Bank of America has an excellent level of CD investments. The bank made 92 investments during the current evaluation period totaling \$20.3 million. Approximately \$18.1 million or 89 percent of the current period investment dollars in the MSA supported over 300 units of affordable housing. In addition, the bank has 21 CD investments totaling \$2.5 million it made during a prior evaluation period that are still outstanding and continue to benefit the community. Outstanding prior period and current period investments total \$22.8 million or 10 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$17.1 million or 84 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$2 million in two separate transactions to Home Headquarters, a CDFI committed to creating housing and revitalization opportunities in the assessment area. Approximately 76 percent of the CDFI's lending benefitted low- and moderate-income families.
- The bank invested nearly \$408,000 in a fund that makes direct and indirect investments in partnerships that own affordable housing projects around the U.S. LIHTCs support many of the projects. This transaction amount represents Bolivar Landing, which provides 24 units of affordable housing in Syracuse, NY.
- The bank invested more than \$430,000 in a similar fund that makes direct and indirect investments in partnerships that own affordable housing projects throughout the U.S. LIHTCs support many of those projects. This transaction represents the Cedar Street Apartments, which provides 24 units of affordable housing in Syracuse, NY.

QUALIFIED INVESTMENTS		Geography: NEW YORK				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Buffalo, NY	42	7,352	102	19,412	144	26,764	18.70	0	0	
Kingston, NY	10	481	22	2,690	32	3,171	2.22	0	0	
Syracuse, NY	21	2,513	92	20,317	113	22,829	15.95	0	0	
Limited Review										
Albany, NY	19	6,411	25	29,268	44	35,679	24.92	1	13,000	
Ithaca, NY	4	1,127	9	746	13	1,873	1.31	0	0	
Rochester, NY	41	5,834	53	20,974	94	26,809	18.73	1	12,387	
Utica, NY	18	942	13	1,173	31	2,114	1.48	0	0	
New York Non-MSA	0	0	8	8,064	8	8,064	5.63	1	4,374	
NEW YORK - Statewide	1	52	27	306	28	358	0.25	0	0	
NEW YORK - Non Assessed	45	3,283	59	12,203	104	15,486	10.82	1	4,511	
NEW YORK	201	27,995	410	115,152	611	143,147	100.00	4	34,272	
(*) '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 bank's financial reporting system.										

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the in the Albany-Schenectady-Troy, NY MSA, Ithaca, NY MSA, Rochester, NY MSA, Utica, NY MSA, and New York Non-MSA is consistent with the Outstanding Investment Test performance in the state of New York.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of New York is rated High Satisfactory. Service Test performance is good in the Buffalo-Cheektowaga-Niagara Falls, NY MSA, excellent in the Kingston, NY MSA, and good in the Syracuse, NY MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Buffalo-Cheektowaga-Niagara Falls, NY MSA

In the Buffalo-Cheektowaga-Niagara Falls, NY MSA, the bank's delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 24 financial centers with the distribution of the population. The bank has four financial centers in low-income geographies representing 16.7 percent of its financial centers. Low-income geographies have 9.6 percent of the assessment area's population. In moderate-income geographies, the bank has three or 12.5 percent of its financial centers compared with 17 percent of the population.

Examiners also considered the bank’s alternative delivery systems including cash dispensing and full-service ATMs, telephone, online, mobile and text banking in evaluating accessibility to the bank’s products and services. Alternative delivery systems have a positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customer’s residency. In four of six ADS platforms, the percentage of customers in low- and moderate-income geographies using the platform was near to or exceeded the percentage of the population in low- and moderate-income geographies.

The bank has six financial centers located in middle- and upper-income geographies that are adjacent to or in very close proximity to low- and moderate-income geographies. Two of those financial centers are adjacent to low-income geographies and the remaining four financial centers are adjacent to moderate-income geographies. The adjacent financial centers help improve accessibility of retail banking services in low-and moderate-income geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank closed 10 financial centers and opened none. The bank closed one financial center in a low-income geography, one in a moderate-income geography, and the remaining eight in middle- and upper-income geographies. Despite the closures, financial centers remain accessible to individuals and geographies of different income levels.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are consistent throughout the assessment area. Financial centers are open 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 5:00 pm on Friday, and 10:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Buffalo-Cheektowaga-Niagara Falls NY MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	37	12.5	108,694	9.6	4	16.7	8	17.4	0	0.0	1	10.0
Moderate	60	20.2	193,392	17.0	3	12.5	6	13.0	0	0.0	1	10.0
Middle	123	41.4	443,162	39.0	10	41.7	21	45.7	0	0.0	3	30.0
Upper	71	23.9	376,538	33.2	7	29.2	11	23.9	0	0.0	5	50.0
NA	6	2.0	13,723	1.2	0	0.0	0	0.0	0	0.0	0	0.0
Totals	297	100.0	1,135,509	100.0	24	100.0	46	100.0	0	100.0	10	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Kingston, NY MSA

In the Kingston, NY MSA, the bank’s delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s five financial centers with the distribution of the population. There are no low-income census tracts in the MSA. The bank has two financial centers in moderate-income geographies representing 40 percent of its financial centers. Moderate-income geographies have 12.3 percent of the assessment area’s population.

Examiners also considered the bank’s alternative delivery systems including cash dispensing and full-service ATMs, telephone, online, mobile and text banking in evaluating accessibility to the bank’s products and services. Alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customer’s residency. In four of six ADS platforms, the percentage of customers in low- and moderate-income geographies using the platform exceeded the percentage of the population in low- and moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank closed two financial centers in middle-income geographies.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are consistent throughout the assessment area. Financial centers are open 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 5:00 pm on Friday, and 9:00 am to 12:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Kingston NY MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	7	14.9	22,450	12.3	2	40.0	4	36.4	0	0.0	0	0.0
Middle	33	70.2	131,881	72.3	3	60.0	6	54.5	0	0.0	2	100.0
Upper	7	14.9	28,162	15.4	0	0.0	1	9.1	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	47	100.0	182,493	100.0	5	100.0	11	100.0	0	100.0	2	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Syracuse, NY MSA

In the Syracuse, NY MSA, the bank’s delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 11 financial centers with the distribution of the population. The bank has one financial center in a low-income geography representing 9.1 percent of its financial centers. Low-income geographies have 10.3 percent of the assessment area’s population. In

moderate-income geographies, the bank has one financial center, representing 9.1 percent of its financial centers compared with 16.2 percent of the population.

Examiners also considered the bank’s alternative delivery systems including cash dispensing and full-service ATMs, telephone, online, mobile and text banking in evaluating accessibility to the bank’s products and services. Alternative delivery systems have no effect on the retail banking services conclusion.

The bank has five financial centers located in middle- and upper-income geographies that are adjacent to or in very close proximity to low- and moderate-income geographies. One of the financial centers is adjacent to a low-income geography and the remaining four financial centers are adjacent to moderate-income geographies. The adjacent financial centers help improve accessibility of retail banking services in low-and moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank closed five financial centers and opened none. The bank closed three financial centers in low-income geographies and two in middle-income geographies. The primary reason for the closures was poor financial performance. The closest financial center to two of three of the closures is lower than 0.4 miles.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial centers are generally open 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 5:00 pm Friday, and 9:00 am to 12:00 pm Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Syracuse NY MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	26	14.1	68,012	10.3	1	9.1	2	12.5	0	0.0	3	60.0
Moderate	35	18.9	107,511	16.2	1	9.1	2	12.5	0	0.0	0	0.0
Middle	73	39.5	292,111	44.1	2	18.2	2	12.5	0	0.0	2	40.0
Upper	50	27.0	194,475	29.4	7	63.6	10	62.5	0	0.0	0	0.0
NA	1	0.5	468	0.1	0	0.0	0	0.0	0	0.0	0	0.0
Totals	185	100.0	662,577	100.0	11	100.0	16	100.0	0	100.0	5	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Buffalo-Cheektowaga-Niagara Falls, NY MSA

The bank provides a relatively high level of community development services. During the evaluation period, the bank participated with community development organizations to provide 66 community development services targeted to low- and moderate-income individuals. Employees provided five financial education workshops and one foreclosure prevention workshop for 307 individuals. Attendees to the financial education workshops were primarily

students from low- and moderate-income families. Employees also participated in 35 tax preparation workshops. Employees participated in 14 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 10 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Kingston, NY MSA

The bank provides a limited level of community development services. During the evaluation period, the bank participated with community development organizations to provide nine community development services targeted to low- and moderate-income individuals. Employees provided six financial education workshops for 162 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in three webinars and workshops with non-profit organizations to help the organizations with capacity building. No employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Syracuse, NY MSA

The bank provides a relatively high level of community development services. During the evaluation period, the bank participated with community development organizations to provide 37 community development services targeted to low- and moderate-income individuals. Employees provided three financial education workshops and one foreclosure prevention workshop for 57 individuals. Employees participated in 17 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 16 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Albany-Schenectady-Troy, NY MSA is consistent with the High Satisfactory Service Test performance in the state of New York. Performance in the Rochester, NY MSA is stronger than the overall High Satisfactory Service Test performance in the state of New York due to the stronger distribution of financial centers. Performance in the Ithaca, NY MSA, Utica, NY MSA, and New York Non-MSA is weaker than the overall High Satisfactory Service Test performance in the state of New York due to the weaker distribution of financial centers.

State of North Carolina

CRA Rating for North Carolina³⁷: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business/farm revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in North Carolina

The state of North Carolina is Bank of America's 21st largest rating area based on its total deposits in the state when excluding the Charlotte-Concord-Gastonia, NC-SC Multistate MSA and Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA. Examiners excluded the multistate MSAs from the analysis of the state of North Carolina because examiners evaluated the multistate MSAs as separate rating areas. As of June 30, 2016, the bank maintained approximately \$9.4 billion or 0.8 percent of its total domestic deposits in financial centers in areas of the state of North Carolina that do not include the multistate MSAs. Of the 86 depository financial institutions operating in the areas of the state of North Carolina that exclude the multistate MSAs, Bank of America, with a deposit market share of 6.4 percent, is the fourth largest. The bank's primary competitors for deposits in North Carolina with deposit shares greater than 5 percent include Branch Banking and Trust Company (32.3 percent), Wells Fargo Bank (15.6 percent), and First Citizens Bank & Trust Company (8.7 percent). As of December 31, 2016, BANA operated 95 financial centers and 218 full service ATMs in the areas of the state of North Carolina that exclude the multistate MSAs.

Refer to the community profiles for the state of North Carolina in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

³⁷ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in North Carolina

Examiners selected three assessment areas for full-scope reviews and the remaining ten assessment areas for limited-scope reviews. The full-scope assessment areas selected included the Greensboro-High Point, NC MSA, Jacksonville, NC MSA, and Raleigh, NC MSA. The full-scope assessment areas together comprise 49 percent of the bank's deposits and 45 percent of the bank's lending in the state of North Carolina. Examiners based conclusions and ratings on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 31,822 home mortgage loans totaling \$5.7 billion, 33,052 small loans to businesses totaling \$811.7 million, 358 small loans to farms totaling \$6 million, and 19 CD loans totaling \$77.2 million. Lending volumes include loans originated or purchased in the Goldsboro, NC MSA, which the bank no longer designates as an assessment area due to the closure or sale of all financial centers and deposit-taking ATMs in the community. Based on loan volume, examiners weighted small loans to businesses the most, representing 51 percent of the volume, followed by home mortgage loans at 49 percent, and small loans to farms at less than 1 percent.

Examiners conducted telephone interviews with three local community service agencies representing neighborhood housing, employment, and community service needs. The community contacts noted that affordable housing, land banks, financial literacy, and financing programs for applicants with weak credit as a concern across the state.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

LENDING TEST

Conclusions in Areas receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of North Carolina is rated High Satisfactory, based on excellent lending activity, good geographic distribution, and good income distribution. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of North Carolina is excellent. Lending activity is excellent in the Greensboro-High Point, NC MSA, Jacksonville, NC MSA, and Raleigh, NC MSA.

Greensboro-High Point, NC MSA

Lending activity in the Greensboro-High Point, NC MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 10.7 percent. The bank ranks fourth among 22 depository financial institutions in the assessment area, which

places it in the top 19 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.8 percent based on the number of home mortgage loans originated or purchased. The bank ranks fifth among 403 home mortgage lenders, which places it in the top 2 percent of lenders competing for loans. According to peer small business data for 2016, the bank has a 5.7 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks sixth among 93 small business lenders, which places it in the top 7 percent of lenders in the MSA. According to peer farm data for 2016, the bank has a market share of 3 percent based on the number of small loans to farms originated or purchased. The bank ranks third among 21 farm lenders, which places it in the top 15 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses, overall lending activity is excellent.

Jacksonville, NC MSA

Lending activity in the Jacksonville, NC MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 15.3 percent. The bank ranks second among 11 depository financial institutions, which places it in the top 19 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.2 percent based on the number of home mortgage loans originated or purchased. The bank ranks 17th among 230 home mortgage lenders, which places it in the top 8 percent of lenders competing for loans. According to peer small business data for 2016, the bank has a 6.8 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks seventh among 58 small business lenders, which places it in the top 13 percent of lenders in the MSA. The bank originated or purchased too few small loans to farms for any meaningful analysis. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses, overall lending activity is excellent.

Raleigh, NC MSA

Lending activity in the Raleigh, NC MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 11.6 percent. The bank ranks third among 33 depository financial institutions, which places it in the top 10 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.1 percent based on the number of home mortgage loans originated or purchased. The bank ranks 11th among 572 home mortgage lenders, which places it in the top 2 percent of lenders competing for loans. According to peer small business data for 2016, the bank has a 7.5 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fifth among 116 small business lenders, which places it in the top 5 percent of lenders in the MSA. According to peer small farm data for 2016, the bank has a 3 percent market share of small loans to farms based on the number of small loans to farms originated or purchased. The bank ranks seventh among 20 farm lenders, which places it in the top 35 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses, overall lending activity is excellent.

LENDING VOLUME		Geography: NORTH CAROLINA						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Greensboro, NC	12.28	4,074	586,097	3,907	109,484	27	198	2	5,310	8,010	701,089	13.35
Jacksonville, NC	3.20	1,302	188,779	773	24,840	11	83	0	0	2,086	213,702	1.75
Raleigh, NC	25.16	7,251	1,509,043	9,114	234,145	54	970	1	8,300	16,420	1,752,458	34.03
Limited Review												
Asheville, NC	8.30	2,179	416,521	3,200	64,119	35	330	3	9,300	5,417	490,270	6.40
Burlington, NC	1.91	675	83,878	570	10,904	2	6	0	0	1,247	94,788	1.59
Durham, NC	9.18	2,687	605,843	3,271	90,789	33	301	0	0	5,991	696,933	11.91
Fayetteville, NC	4.44	1,665	229,268	1,222	28,122	10	56	1	7,430	2,898	264,876	5.00
Goldsboro, NC	0.27	106	11,776	65	778	3	35	0	0	176	12,589	0.00
Greenville, NC	2.30	742	98,968	729	13,914	26	1,558	2	10,635	1,499	125,075	2.95
Hickory, NC	3.64	1,172	164,387	1,181	26,804	20	185	2	1,950	2,375	193,326	1.55
New Bern, NC	0.71	243	34,123	213	4,670	5	25	0	0	461	38,818	0.98
Wilmington, NC	7.86	2,432	521,129	2,677	51,039	21	399	1	4,848	5,131	577,415	5.28
Winston, NC	6.67	2,356	326,725	1,986	45,585	9	68	3	21,765	4,354	394,143	6.61
North Carolina Non-MSA	14.08	4,936	911,730	4,144	106,497	102	1,827	4	7,617	9,186	1,027,671	8.61
NORTH CAROLINA	100.00	31,822	5,688,267	33,052	811,690	358	6,041	19	77,155	65,251	6,583,153	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations/purchases.

The overall geographic distribution of home mortgage loans is adequate. The distribution is good in the Greensboro-High Point, NC MSA and adequate in the Jacksonville and Raleigh, NC MSAs.

Greensboro-High Point, NC MSA

The geographic distribution of home mortgage loans in the Greensboro-High Point, NC MSA is good. Performance is good in both low- and moderate-income geographies. The distribution of the bank’s home mortgage loans in low-income geographies at 1.8 percent is lower than the 2.4 percent of owner-occupied housing units in low-income geographies and it is slightly higher than the 1.2 percent performance of aggregate lenders. The distribution in moderate-income geographies at 14 percent is also lower than the 18.7 percent of owner-occupied housing units in moderate-income geographies, but is higher than the 13.9 percent performance for aggregate lenders.

Jacksonville, NC MSA

The geographic distribution of home mortgage loans in the Jacksonville, NC MSA is adequate. Because there are no low-income census tracts in the MSA, examiners based the overall conclusion on performance in moderate-income geographies. Performance is adequate in moderate-income geographies. The distribution in moderate-income geographies at 1.5 percent is lower than the 3.8 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 1.9 percent performance for aggregate lenders.

Raleigh, NC MSA

The geographic distribution of home mortgage loans in the Raleigh, NC MSA is adequate. Performance is adequate in both low- and moderate-income geographies. The distribution of the bank's home mortgage loans in low-income geographies at 1.6 percent is lower than the 2.5 percent of owner-occupied housing units in low-income geographies and it is slightly lower than the 1.8 percent performance for aggregate lenders. The distribution in moderate-income geographies at 15.9 percent is lower than the 25.8 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 19.6 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Greensboro-High Point NC MSA	1,604	236,640	13.5	19,127	2.4	1.8	1.2	18.7	14.0	13.9	46.4	35.2	42.6	32.6	49.0	42.3	0.0	0.0	0.0
FS Jacksonville NC MSA	455	58,759	3.8	7,658	0.0	0.0	0.0	3.8	1.5	1.9	65.1	70.5	70.3	31.2	27.7	27.7	0.0	0.2	0.1
FS Raleigh NC MSA	3,219	721,848	27.2	59,076	2.5	1.6	1.8	25.8	15.9	19.6	38.3	39.8	45.3	33.4	42.7	33.3	0.0	0.0	0.0
LS Asheville NC MSA	930	188,131	7.8	16,031	0.8	0.8	1.2	14.0	12.7	13.1	65.0	59.0	64.0	20.2	27.5	21.7	0.0	0.0	0.0
LS Burlington NC MSA	275	34,440	2.3	4,797	0.0	0.0	0.0	17.1	20.7	11.6	48.3	41.5	50.8	34.6	37.8	37.6	0.0	0.0	0.0
LS Durham-Chapel Hill NC MSA	1,185	286,210	10.0	19,022	3.2	1.7	2.7	17.1	14.6	13.9	41.3	34.2	38.8	38.5	49.5	44.5	0.0	0.0	0.0
LS Fayetteville NC MSA	633	70,643	5.3	11,827	1.4	0.6	0.4	10.1	9.5	5.5	55.4	55.6	54.9	33.1	34.3	39.3	0.0	0.0	0.0
LS Greenville NC MSA	293	40,681	2.5	4,077	1.8	1.4	1.5	12.5	8.5	10.9	44.7	37.5	35.7	41.0	52.6	52.0	0.0	0.0	0.0
LS Hickory-Lenoir-Morganton NC MSA	512	70,361	4.3	8,402	0.0	0.0	0.0	13.9	11.1	11.2	67.6	57.4	64.1	18.5	31.4	24.6	0.0	0.0	0.0
LS New Bern NC MSA	243	34,123	2.1	3,384	2.4	1.6	2.3	15.5	15.2	9.8	49.7	46.1	38.4	32.5	37.0	49.5	0.0	0.0	0.0
LS North Carolina Non-MSA	726	146,120	6.1	10,971	0.6	0.1	0.2	6.2	5.4	3.6	60.2	48.3	50.1	32.9	46.1	46.1	0.0	0.0	0.0
LS Wilmington NC MSA	727	169,445	6.1	12,717	3.7	2.3	2.5	11.8	8.9	8.9	47.8	47.7	49.5	36.6	41.0	39.1	0.0	0.0	0.0
LS Winston-Salem NC MSA	1,046	141,520	8.8	17,449	2.4	2.6	1.2	14.8	14.0	10.8	49.9	45.2	46.1	32.8	38.2	41.9	0.0	0.0	0.0
Total	11,848	2,198,921	100.0	194,538	1.9	1.4	1.4	16.2	12.8	13.1	50.3	44.5	48.8	31.6	41.3	36.8	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The distribution is excellent in the Greensboro-High Point, NC MSA and Jacksonville, NC MSA and good in the Raleigh, NC MSA.

Greensboro-High Point, NC MSA

The geographic distribution of small loans to businesses in the Greensboro-High Point, NC MSA is excellent. Performance is excellent in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 6.7 percent is higher than the 6.2 percent of businesses in low-income geographies and it is higher than the 6.2 percent performance for aggregate lenders. The distribution in moderate-income geographies at 18.2 percent is lower than the 19.9 percent of businesses in moderate-income geographies and it is slightly lower than the 18.8 percent performance for aggregate lenders.

Jacksonville, NC MSA

The geographic distribution of small loans to businesses in the Jacksonville, NC MSA is excellent. Because there are no low-income census tracts, examiners based the overall conclusion on performance in moderate-income geographies. Performance is excellent in moderate-income geographies. The distribution in moderate-income geographies at 12.5 percent is higher than the 9.6 percent of businesses in moderate-income geographies and higher than the 7.4 percent performance for aggregate lenders.

Raleigh, NC MSA

The geographic distribution of small loans to businesses in the Raleigh, NC MSA is good. Performance is good in low-income geographies and adequate moderate-income geographies. The distribution in low-income geographies at 4.1 percent is slightly lower than the 4.6 percent of businesses in low-income geographies and it is higher than the 3.7 percent performance for aggregate lenders. The distribution in moderate-income geographies at 17.9 percent is lower than the 23.2 percent of businesses in moderate-income geographies and it is lower than the 20.7 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Busines ses	% Bank Loans	Aggre gate	% Busines ses	% Bank Loans	Aggre gate	% Busines ses	% Bank Loans	Aggre gate	% Busines ses	% Bank Loans	Aggre gate	% Busines ses	% Bank Loans	Aggre gate
FS Greensboro-High Point NC MSA	2,447	63,566	12.6	14,663	6.2	6.7	6.2	19.9	18.2	18.8	43.1	39.6	39.6	30.6	35.5	35.3	0.1	0.2	0.1
FS Jacksonville NC MSA	456	13,093	2.5	2,012	0.0	0.0	0.0	9.6	12.5	7.4	65.3	64.0	67.5	23.7	22.8	25.1	1.3	0.9	0.1
FS Raleigh NC MSA	5,943	138,179	30.6	29,701	4.6	4.1	3.7	23.2	17.9	20.7	33.6	35.8	34.7	38.4	42.1	40.8	0.2	0.1	0.1
LS Asheville NC MSA	1,972	35,272	10.1	9,721	4.4	3.7	4.4	16.7	17.5	18.1	54.8	51.6	51.5	24.1	27.2	26.0	0.0	0.0	0.0
LS Burlington NC MSA	373	6,065	1.9	2,488	0.0	0.0	0.0	18.4	16.6	17.4	50.8	48.3	50.2	30.8	35.1	32.5	0.0	0.0	0.0
LS Durham-Chapel Hill NC MSA	2,089	54,117	10.7	11,365	6.0	4.0	4.4	20.3	16.0	18.6	36.2	34.0	35.8	36.7	45.9	41.2	0.7	0.1	0.1
LS Fayetteville NC MSA	750	16,330	3.9	4,339	8.0	6.1	8.5	9.8	8.7	8.1	49.9	51.2	47.4	32.0	33.9	36.1	0.3	0.4	0.0
LS Greenville NC MSA	413	5,070	2.1	2,648	2.6	2.4	1.2	23.1	20.1	22.8	37.3	39.0	37.8	37.1	38.5	38.2	0.0	0.0	0.0
LS Hickory-Lenoir-Morganton NC MSA	673	14,995	3.5	5,057	0.0	0.0	0.0	21.7	19.5	21.5	57.3	51.3	53.7	21.0	29.3	24.8	0.0	0.0	0.0
LS New Bern NC MSA	213	4,670	1.1	1,771	7.7	6.1	5.4	13.7	13.1	13.9	47.5	42.3	47.7	31.0	38.5	33.1	0.0	0.0	0.0
LS Wilmington NC MSA	1,591	31,558	8.2	8,561	7.4	7.4	5.4	14.0	11.9	11.4	38.9	41.5	40.8	39.5	39.0	42.2	0.2	0.7	0.2
LS Winston-Salem NC MSA	1,332	25,856	6.8	12,215	4.5	4.5	3.6	17.2	13.4	14.3	44.8	40.7	43.3	33.5	41.4	38.9	0.0	0.0	0.0
LS North Carolina Non-MSA	1,199	26,134	6.2	7,324	0.7	0.5	0.4	6.3	4.9	6.4	58.8	53.5	54.2	34.1	41.1	39.1	0.0	0.0	0.0
Total	19,451	434,905	100.0	111,865	4.6	4.2	3.9	18.1	15.6	16.8	44.0	41.7	42.2	33.1	38.3	37.1	0.2	0.1	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to farms.

The overall geographic distribution of small loans to farms is good. The distribution is good in the Greensboro-High Point, NC MSA and good in the Raleigh, NC MSA.

Greensboro-High Point, NC MSA

The geographic distribution of small loans to farms in the Greensboro-High Point, NC MSA is good. Performance is poor in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 0 percent is lower than the 1.8 percent of farms in low-income geographies and it is lower than the 1.2 percent performance for aggregate lenders. The distribution in moderate-income geographies at 16.7 percent is higher than the 14.7 percent of farms in moderate-income geographies and it is higher than the 11.1 percent performance for aggregate lenders.

Jacksonville, NC MSA

The bank originated or purchased too few small loans to farms for any meaningful analysis.

Raleigh, NC MSA

The geographic distribution of small loans to farms in the Raleigh, NC MSA is good. Performance is excellent in low-income geographies and poor in moderate-income geographies. The distribution in low-income geographies at 12.5 percent is significantly higher than the 3.7 percent of farms in low-income geographies and it is significantly higher than the 4.7 percent performance for aggregate lenders. The distribution in moderate-income geographies at 16.7 percent is lower than the 30.2 percent of farms in moderate-income geographies and it is lower than the 52.2 percent performance for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS Greensboro-High Point NC MSA	17	110	9.7	162	1.8	0.0	1.2	14.7	16.7	11.1	54.9	52.9	71.6	28.7	35.3	16.0	0.0	0.0	0.0
FS Jacksonville NC MSA	6	47	4.2	37	0.0	0.0	0.0	3.0	0.0	0.0	72.9	83.3	83.8	23.3	33.3	16.2	0.9	0.0	0.0
FS Raleigh NC MSA	30	417	16.0	295	3.7	12.5	4.7	30.2	16.7	52.2	40.8	33.3	28.8	25.2	46.7	14.2	0.0	0.0	0.0
LS Asheville NC MSA	27	214	14.4	102	1.0	0.0	1.0	18.0	0.0	15.7	64.4	74.1	70.6	16.6	25.9	12.7	0.0	0.0	0.0
LS Burlington NC MSA	0	0	0.0	43	0.0	0.0	0.0	8.5	0.0	2.3	61.7	0.0	76.7	29.8	0.0	20.9	0.0	0.0	0.0
LS Durham-Chapel Hill NC MSA	21	202	13.4	114	2.5	0.0	1.8	10.2	33.3	12.3	58.4	66.7	68.4	29.0	33.3	17.5	0.0	0.0	0.0
LS Fayetteville NC MSA	9	49	6.7	52	2.5	0.0	3.8	11.9	22.2	11.5	52.7	55.6	65.4	32.8	42.9	19.2	0.2	0.0	0.0
LS Greenville NC MSA	14	328	7.5	84	0.7	0.0	0.0	10.1	0.0	2.4	58.4	64.3	73.8	30.9	35.7	23.8	0.0	0.0	0.0
LS Hickory-Lenoir-Morganton NC MSA	11	141	6.0	98	0.0	0.0	0.0	11.7	0.0	1.0	67.9	72.7	78.6	20.5	42.9	20.4	0.0	0.0	0.0
LS New Bern NC MSA	4	18	3.2	80	0.9	0.0	0.0	23.1	66.7	17.5	60.0	75.0	80.0	15.9	0.0	2.5	0.0	0.0	0.0
LS Wilmington NC MSA	11	89	5.9	62	5.2	0.0	8.1	15.4	0.0	17.7	48.9	63.6	53.2	30.1	36.4	21.0	0.4	0.0	0.0
LS Winston-Salem NC MSA	5	35	6.3	144	1.3	0.0	0.0	13.8	25.0	18.8	54.8	40.0	64.6	30.1	50.0	16.7	0.0	0.0	0.0
LS North Carolina Non-MSA	30	786	16.0	354	0.4	0.0	0.0	4.2	10.0	5.1	60.5	56.7	60.7	35.0	40.0	34.2	0.0	0.0	0.0
Total	187	2,450	100.0	1,627	1.9	1.9	1.6	15.7	7.5	17.3	55.3	58.3	61.0	27.1	33.7	20.0	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Greensboro-High Point, NC MSA, Jacksonville, NC MSA, and Raleigh, NC MSA.

Greensboro High Point MSA

The distribution of home mortgage loans by borrower income in the Greensboro-High Point, NC MSA is good. The distribution is adequate for low-income borrowers and good for moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 7.9 percent is lower than the 21.8 percent of low-income families, but higher than the 5.6 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 15.8 percent is lower than the 18.1 percent of moderate-income families and it is higher than the 15.2 percent performance for aggregate lenders.

Jacksonville, NC MSA

The distribution of home mortgage loans by borrower income in the Jacksonville, NC MSA is good. The distribution is adequate for low-income borrowers and good for moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 5.9 percent is lower than the 17.2 percent of low-income families, but higher than the 1.7 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 13.6 percent is lower than the 19.8 percent of moderate-income families and it is higher than the 9.5 percent performance for aggregate lenders.

Raleigh, NC MSA

The distribution of home mortgage loans by borrower income in the Raleigh, NC MSA is good. The distribution is adequate for low-income borrowers and good for moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 9.4 percent is lower than the 22.2 percent of low-income families, but higher than the 6.1 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 14.5 percent is lower than the 17.1 percent of moderate-income families and it is lower than the 16 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Greensboro-High Point NC MSA	1,604	236,640	13.5	19,127	21.8	7.9	5.6	18.1	15.8	15.2	19.2	17.0	20.3	40.8	45.4	38.6	0.0	14.0	20.4
FS Jacksonville NC MSA	455	58,759	3.8	7,658	17.2	5.9	1.7	19.8	13.6	9.5	22.8	16.5	22.4	40.2	32.1	32.3	0.0	31.9	34.1
FS Raleigh NC MSA	3,219	721,848	27.2	59,076	22.2	9.4	6.1	17.1	14.5	16.0	20.0	19.0	19.6	40.7	50.3	42.2	0.0	6.8	16.1
LS Asheville NC MSA	930	188,131	7.8	16,031	19.7	8.3	4.0	18.7	13.9	14.4	21.7	20.4	21.8	39.9	52.3	46.9	0.0	5.2	13.0
LS Burlington NC MSA	275	34,440	2.3	4,797	21.3	12.0	4.7	17.0	18.2	14.9	20.7	22.2	20.8	41.0	40.7	40.9	0.0	6.9	18.7
LS Durham-Chapel Hill NC MSA	1,185	286,210	10.0	19,022	23.2	8.5	6.3	16.9	15.4	15.5	18.5	17.0	19.1	41.4	50.7	45.3	0.0	8.4	13.8
LS Fayetteville NC MSA	633	70,643	5.3	11,827	21.5	12.0	2.2	17.9	15.5	8.5	18.9	18.6	17.6	41.6	29.4	29.7	0.0	24.5	42.0
LS Greenville NC MSA	293	40,681	2.5	4,077	24.3	5.1	3.8	15.8	14.0	14.5	18.1	18.8	20.5	41.9	54.9	40.5	0.0	7.2	20.8
LS Hickory-Lenoir-Morganton NC MSA	512	70,361	4.3	8,402	20.5	6.6	6.1	18.2	19.1	17.3	21.9	18.6	20.6	39.3	43.6	38.2	0.0	12.1	18.0
LS New Bern NC MSA	243	34,123	3.0	3,384	20.8	7.0	3.2	18.3	15.6	11.6	20.1	25.5	19.8	40.8	37.4	41.6	0.0	14.4	23.8
LS North Carolina Non-MSA	726	146,120	6.1	10,971	20.1	7.4	2.2	16.6	8.3	10.3	19.5	14.5	15.5	43.8	60.3	54.6	0.0	9.5	17.4
LS Wilmington NC MSA	727	169,445	6.1	12,717	20.5	9.9	3.3	17.7	13.6	12.4	22.0	17.3	18.1	39.8	48.3	49.7	0.0	10.9	16.6
LS Winston-Salem NC MSA	1,046	141,520	8.8	17,449	21.3	13.2	5.6	17.5	20.2	17.7	20.8	20.9	19.7	40.5	34.4	37.6	0.0	11.3	19.3
Total	11,848	2,198,921	100.0	194,538	21.4	9.1	4.9	17.6	15.1	14.5	20.2	18.5	19.5	40.9	46.4	41.9	0.0	10.9	19.1

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The distribution is good in the Greensboro-High Point, NC MSA, Jacksonville, NC MSA, and Raleigh, NC MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 33 percent of its small loans to businesses.

Greensboro-High Point, NC MSA

The distribution in the Greensboro-High Point, NC MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 57.9 percent is lower than the 77.5 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 49.4 percent for aggregate lenders, overall performance is good.

Jacksonville, NC MSA

The distribution in the Jacksonville, NC MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 60.5 percent is lower than

the 78.7 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 50.8 percent for aggregate lenders, overall performance is good.

Raleigh, NC MSA

The distribution in the Raleigh, NC MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 60 percent is lower than the 78.8 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 50 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Greensboro-High Point NC MSA	2,447	63,566	12.6	14,663	77.5	57.9	49.4	5.0	11.4	17.5	30.7
FS Jacksonville NC MSA	456	13,093	2.3	2,012	78.7	60.5	50.8	3.5	7.9	17.8	31.6
FS Raleigh NC MSA	5,943	138,179	30.6	29,701	78.8	60.0	50.0	4.4	9.1	16.8	30.8
LS Asheville NC MSA	1,972	35,272	10.1	9,721	79.1	55.5	52.4	3.7	9.9	17.1	34.6
LS Burlington NC MSA	373	6,065	1.9	2,488	76.5	58.2	47.9	5.1	12.3	18.4	29.5
LS Durham-Chapel Hill NC MSA	2,089	54,117	10.7	11,365	77.8	57.5	52.7	4.3	10.3	17.8	32.2
LS Fayetteville NC MSA	750	16,330	3.9	4,339	78.6	62.9	54.6	3.4	9.2	18.0	27.9
LS Greenville NC MSA	413	5,070	2.5	2,648	76.0	50.4	46.3	4.6	10.7	19.4	39.0
LS Hickory-Lenoir-Morganton NC MSA	673	14,995	3.5	5,057	76.8	55.7	49.0	5.5	10.7	17.7	33.6
LS New Bern NC MSA	213	4,670	1.1	1,771	77.0	55.4	51.4	4.3	9.9	18.7	34.7
LS Wilmington NC MSA	1,591	31,558	8.2	8,561	79.1	55.9	45.6	4.5	10.3	16.5	33.8
LS Winston-Salem NC MSA	1,332	25,856	7.0	12,215	79.1	54.7	49.2	4.8	11.8	16.2	33.5
LS North Carolina Non-MSA	1,199	26,134	6.2	7,324	78.7	51.4	52.7	4.0	9.8	17.2	38.8
Total	19,451	434,905	100.0	111,865	78.3	57.5	50.2	4.4	10.1	17.3	32.5

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The distribution is poor in the Greensboro-High Point, NC MSA and adequate in the Raleigh, NC MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 34 percent of its small loans to businesses.

Greensboro-High Point, NC MSA

The distribution in the Greensboro-High Point, NC MSA is poor. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 41.2 percent is lower than the 97.7 percent of farms with gross annual revenues of \$1 million or less. The distribution is also lower than the 47.5 percent performance for aggregate lenders.

Jacksonville, NC MSA

The bank originated or purchased too few small loans to farms for any meaningful analysis.

Raleigh, NC MSA

The distribution in the Raleigh, NC MSA is adequate. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 53.3 percent is lower than the 94.8 percent of farms with gross annual revenues of \$1 million or less. The distribution is also lower than the 54.9 percent performance for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Greensboro-High Point NC MSA	17	110	9.1	162	97.7	41.2	47.5	1.4	23.5	0.9	35.3
FS Jacksonville NC MSA	6	47	4.0	37	96.3	50.0	56.8	2.1	0.0	1.6	60.0
FS Raleigh NC MSA	30	417	18.3	295	94.8	53.3	54.9	3.1	0.0	2.1	46.7
LS Asheville NC MSA	27	214	14.4	102	97.9	63.0	46.1	1.5	11.1	0.7	25.9
LS Burlington NC MSA	0	0	0.0	43	97.4	0.0	41.9	2.1	0.0	0.4	0.0
LS Durham-Chapel Hill NC MSA	21	202	14.3	114	96.7	71.4	42.1	1.7	11.1	1.5	41.7
LS Fayetteville NC MSA	10	56	6.7	52	96.7	60.0	53.8	2.2	0.0	1.2	44.4
LS Greenville NC MSA	14	328	8.5	84	96.5	35.7	63.1	2.5	28.6	1.0	50.0
LS Hickory-Lenoir-Morganton NC MSA	11	141	6.7	98	97.5	63.6	50.0	1.6	50.0	0.9	33.3
LS New Bern NC MSA	5	25	3.8	80	96.3	50.0	56.3	2.1	0.0	1.6	80.0
LS Wilmington NC MSA	11	89	7.0	62	95.1	63.6	45.2	3.1	20.0	1.8	60.0
LS Winston-Salem NC MSA	5	35	6.3	144	98.3	50.0	56.3	1.0	0.0	0.7	60.0
LS North Carolina Non-MSA	30	786	16.0	354	98.0	73.3	55.7	1.2	12.5	0.8	23.3
Total	187	2,450	100.0	1,627	96.9	57.8	52.5	1.9	8.0	1.2	34.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect on the lending performance in the state of North Carolina. The met the communities’ credit needs primarily through retail lending.

Greensboro-High Point, NC MSA

In the Greensboro-High Point, NC MSA, CD lending has a neutral effect on the bank’s lending performance in the assessment area. During the evaluation period, the bank originated two CD loans totaling \$5.3 million that helped to provide 200 units of affordable housing. CD lending represents 3.4 percent of the allocated Tier 1 Capital.

Jacksonville, NC MSA

In the Jacksonville, NC MSA, CD lending has a negative effect on the lending performance in the assessment area. The bank did not originate or purchase any CD loans during the evaluation period.

Raleigh, NC MSA

In the Raleigh, NC MSA, CD lending has a neutral effect on the lending performance in the assessment area. The bank originated 1 CD loan totaling \$8.3 million that provided 88 units of affordable housing. CD lending represents 2.1 percent of the allocated Tier 1 Capital.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of North Carolina, lending under the MHA and HARP programs accounted for 77 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Burlington, NC MSA, Wilmington, NC MSA, Winston-Salem, NC MSA, and North Carolina Non-MSA is consistent with the High Satisfactory Lending Test performance in the state of North Carolina. Lending performance in the Asheville, NC MSA, Fayetteville, NC MSA, Greenville, NC MSA, Hickory-Lenoir-Morganton, NC MSA, and New Bern, NC MSA is stronger than the overall High Satisfactory Lending Test performance in the state of North Carolina. Performance is stronger primarily due to higher relative levels of CD lending that positively affected lending performance. Lending performance in the Durham-Chapel Hill, NC MSA is weaker than the overall High Satisfactory Lending Test performance in the state of North Carolina due to weaker geographic distributions of loans.

INVESTMENT TEST**Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of North Carolina is rated Outstanding. Investment performance is excellent in the Greensboro-High Point, NC MSA, good in the Jacksonville, NC MSA, and excellent in the Raleigh, NC MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Greensboro-High Point, NC MSA

In the Greensboro-High Point, NC MSA, Bank of America has an excellent level of CD investments. The bank made 78 investments during the evaluation period totaling \$13.2 million. Approximately \$12.8 million or 97 percent of the current period investment dollars in the MSA supported 222 units of affordable housing. In addition, the bank has 40 community development investments totaling \$2.6 million it made during a prior evaluation period still

outstanding that continue to benefit the community. Outstanding prior period and current period investments total \$15.8 million or 10.1 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$10.3 million or 78 percent of the investment dollars.

Examples of community development investments include:

- The bank invested nearly \$720,000 in a fund that invests directly and indirectly in partnerships that own affordable housing developments across the United States. LIHTCs (LIHTC) support many of the projects. This investment represents Sherwood Glen, which provides 56 units of affordable housing in the MSA.
- The bank invested \$1.7 million in a LIHTC that helped finance the development of Asheboro Mill Loft Apartments, a 70-unit multifamily housing development in Asheboro, NC. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank has provided annual grants to Greensboro Urban Ministry totaling \$36,000. The organization used the funds to help the organization provide nutritious meals to homeless and low- and moderate-income individuals and families. The organization feeds up to 110 families daily.

Jacksonville, NC MSA

In the Jacksonville, NC MSA, Bank of America has a good level of CD investments. The bank made 15 investments during the evaluation period totaling \$648,000. Approximately \$631,000 or 97 percent of the current period investment dollars in the MSA supported 48 units of affordable housing. In addition, the bank has six CD investments totaling \$1.1 million it made during a prior evaluation period that are still outstanding and continue to benefit the community. Outstanding prior period and current period investments total \$1.8 million or 8.6 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$575,000 or 89 percent of the investment dollars.

Raleigh, NC MSA

In the Raleigh, NC MSA, Bank of America has an excellent level of CD investments. The bank made 118 investments during the evaluation period totaling \$36.6 million. Approximately \$35.4 million or 97 percent of the current period investment dollars in the MSA supported 274 units of affordable housing. In addition, the bank has 31 CD investments totaling \$5 million it made during a prior evaluation period that are still outstanding and continue to benefit the community. Outstanding prior period and current period investments total \$41.6 million or 10.4 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$28.2 million or 77 percent of the investment dollars.

An example of community development investments includes:

- The bank made a \$6.6 million investment in a LIHTC to help finance the construction of Brighton Pointe II, an 88-unit multifamily housing development restricted to seniors aged 55 and older. All units are restricted to incomes at or below 60 percent of the area median income.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review, Investment Test performance in the Asheville, NC MSA, Durham-Chapel Hill, NC MSA, Wilmington, NC MSA, Winston-Salem, NC MSA, and North Carolina Non-MSA is excellent and consistent with the Outstanding Investment Test performance in the state of North Carolina. Investment performance in the Burlington, NC MSA, Fayetteville, NC MSA, Greenville, NC MSA, Hickory-Lenoir-Morganton, NC MSA, and New Bern, NC MSA is weaker than the overall Outstanding Investment Test performance in the state of North Carolina. Investment performance is weaker due to lower levels of CD investments relative to the bank’s size and resources in those assessment areas.

Table 14. Qualified Investments								2012-2016		
QUALIFIED INVESTMENTS		Geography: NORTH CAROLINA				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Greensboro, NC	40	2,622	78	13,212	118	15,834	7.63	0	0	
Jacksonville, NC	6	1,124	15	648	21	1,772	0.85	0	0	
Raleigh, NC	31	5,001	118	36,597	149	41,599	20.04	1	5,544	
Limited Review										
Asheville, NC	7	887	33	12,353	40	13,239	6.38	1	3,631	
Burlington, NC	6	107	16	665	22	773	0.37	0	0	
Durham, NC	21	6,013	59	8,498	80	14,511	6.99	0	0	
Fayetteville, NC	11	1,057	31	2,369	42	3,425	1.65	0	0	
Greenville, NC	3	374	17	1,219	20	1,593	0.77	0	0	
Hickory, NC	2	43	33	1,551	35	1,594	0.77	0	0	
New Bern, NC	1	1	12	540	13	541	0.26	0	0	
Wilmington, NC	13	2,579	30	4,748	43	7,327	3.53	0	0	
Winston, NC	15	639	36	11,013	51	11,653	5.61	1	6,628	
North Carolina Non-MSA	9	1,790	50	33,994	59	35,784	17.24	1	18,302	
NORTH CAROLINA - Statewide	0	0	31	401	31	401	0.19	0	0	
NORTH CAROLINA - Non Assessed	20	3,539	73	53,967	93	57,507	27.71	0	0	
NORTH CAROLINA	185	25,775	632	181,776	817	207,550	100.00	4	34,106	

(*) '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 bank's financial reporting system.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of North Carolina is rated High Satisfactory. Service Test performance is good in the Greensboro-High Point, NC MSA, adequate in the Jacksonville, NC MSA, and good in the Raleigh, NC MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Greensboro-High Point, NC MSA

In the Greensboro-High Point, NC MSA, the bank's delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 14 financial centers with the distribution of the population. The bank has four financial centers in low-income geographies representing 28.6 percent of its financial centers. Low-income geographies have 6.2 percent of the assessment area's population. In moderate-income geographies, the bank has one financial center or 7.1 percent of its financial centers compared with 23.1 percent of the population.

Examiners also considered the bank's alternative delivery systems including cash dispensing and full-service ATMs, telephone, online, mobile and text banking in evaluating accessibility to the bank's products and services. Alternative delivery systems have a positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customers' residency. In four of six ADS platforms, the percentage of customers in low- and moderate-income geographies using the platform exceeded the percentage of the population in low- and moderate-income geographies.

The bank has two financial centers located in middle- and upper-income geographies that are adjacent to or in very close proximity to low- and moderate-income geographies. One financial center is adjacent to low-income geographies and the other financial center is adjacent to moderate-income geographies. The adjacent financial centers help improve accessibility of retail banking services in low-and moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center and closed four. The bank closed two financial centers in moderate-income geographies and two in middle-income geographies.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking

hours are generally consistent throughout the assessment area. Financial centers are generally open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Greensboro-High Point NC MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	13	7.7	44,555	6.2	4	28.6	7	22.6	0	0.0	0	0.0
Moderate	40	23.8	167,016	23.1	1	7.1	3	9.7	0	0.0	2	50.0
Middle	66	39.3	309,590	42.8	5	35.7	12	38.7	1	100.0	2	50.0
Upper	48	28.6	202,640	28.0	4	28.6	9	29.0	0	0.0	0	0.0
NA	1	0.6	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	168	100.0	723,801	100.0	14	100.0	31	100.0	1	100.0	4	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Jacksonville, NC MSA

In the Jacksonville, NC MSA, the bank’s delivery systems are reasonably accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s three financial centers with the distribution of the population. The assessment area has no low-income census tracts. The bank has no financial centers in moderate-income geographies. Moderate-income geographies have 8.4 percent of the population. Due to the limited number of financial centers and the fact that they are located in middle- and upper-income geographies representing 85 percent of the population, financial centers are reasonably accessible.

Examiners also considered the bank’s alternative delivery systems including cash dispensing and full-service ATMs, telephone, online, mobile and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have no effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies.

The bank has one financial center located in a middle-income geography that is adjacent to or in very close proximity to moderate-income geographies. The adjacent financial center helps improve accessibility of retail banking services in moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. The bank closed one financial center in a middle-income geography during the evaluation period.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are consistent throughout the assessment area. Financial centers are open 9:00 am to 5:00 pm Monday through Thursday and 9:00 am to 6:00 pm on Friday. Only the financial center located in an upper-income geography is open Saturday from 9:00 am to 1:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Jacksonville NC MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	4	12.5	14,859	8.4	0	0.0	0	0.0	0	0.0	0	0.0
Middle	18	56.3	112,111	63.1	2	66.7	4	66.7	0	0.0	1	100.0
Upper	7	21.9	38,609	21.7	1	33.3	2	33.3	0	0.0	0	0.0
NA	3	9.4	12,193	6.9	0	0.0	0	0.0	0	0.0	0	0.0
Totals	32	100.0	177,772	100.0	3	100.0	6	100.0	0	100.0	1	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Raleigh, NC MSA

In the Raleigh, NC MSA, the bank’s delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 22 financial centers with the distribution of the population. The bank has one financial center in a low-income geography representing 4.5 percent of its financial centers. Low-income geographies have 6.1 percent of the assessment area’s population. In moderate-income geographies, the bank has three financial centers or 13.6 percent of its financial centers compared with 27.0 percent of the population.

Examiners also considered the bank’s alternative delivery systems including cash dispensing and full-service ATMs, telephone, online, mobile and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have no effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies.

The bank has four financial centers located in middle- and upper-income geographies that are adjacent to or in very close proximity to low- and moderate-income geographies. The bank has one financial center adjacent to a low-income geography and three financial centers adjacent to moderate-income geographies. The adjacent financial centers help improve accessibility of retail banking services in low-and moderate-income geographies

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened three financial centers in middle- and upper-income geographies and closed one financial center in an upper-income geography.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are consistent throughout the assessment area. All financial centers are open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm Friday, and most financial centers are open for Saturday banking 9:00 am to 1:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Raleigh NC MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	16	7.1	69,147	6.1	1	4.5	4	6.8	0	0.0	0	0.0
Moderate	55	24.6	305,636	27.0	3	13.6	6	10.2	0	0.0	0	0.0
Middle	74	33.0	412,653	36.5	8	36.4	23	39.0	1	33.3	0	0.0
Upper	76	33.9	338,767	30.0	10	45.5	26	44.1	2	66.7	1	100.0
NA	3	1.3	4,287	0.4	0	0.0	0	0.0	0	0.0	0	0.0
Totals	224	100.0	1,130,490	100.0	22	100.0	59	100.0	3	100.0	1	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Greensboro-High Point, NC MSA

In the Greensboro-High Point, NC MSA, the bank provides a relatively high level of community development services. During the evaluation period, the bank participated with community development organizations to provide 63 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 4 low- and moderate-income individuals, and provided 17 financial education workshops for 1,139 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 15 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 27 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Jacksonville, NC MSA

In the Jacksonville, NC MSA, the bank provides a limited level of community development services. During the evaluation period, the bank participated with community development organizations to provide six community development services targeted to low- and moderate-income individuals. Employees provided five financial education workshops for 58 individuals. Employees also participated in one webinar with a non-profit organization to help the organization with capacity building. No employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Raleigh, NC MSA

In the Raleigh, NC MSA, the bank is a leader in providing community development services. During the evaluation period, the bank participated with community development organizations to provide 219 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 144 low- and moderate-income individuals, and provided 7 financial education workshops and 30 foreclosure prevention workshops for 293 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 24 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 12 employees served on the boards or committees of community

organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Asheville, NC MSA, Fayetteville, NC MSA, Greenville, NC MSA, and Winston-Salem, NC MSA is consistent with the High Satisfactory performance under the Service Test in the state of North Carolina. Service Test performance in the Hickory-Lenoir-Morganton, NC MSA and Wilmington, NC MSA is stronger than the overall High Satisfactory Service Test performance in the state of North Carolina. Performance is stronger due to stronger accessibility of service delivery systems. Service Test performance in the Burlington, NC MSA, Durham-Chapel Hill, NC MSA, New Bern, NC MSA, and North Carolina Non-MSA is weaker than the overall High Satisfactory Service Test performance in the state of North Carolina. Performance is weaker due to weaker accessibility of service delivery systems.

State of Ohio

CRA Rating for Ohio³⁸:	Outstanding
The Lending Test is rated:	<u>Outstanding</u>
The investment test is rated:	<u>Outstanding</u>
The service test is rated:	<u>Low Satisfactory</u>

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and good distribution of loans by borrower income or business/farm revenue size;
- Relatively high level of CD lending that has a significantly positive effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Reasonably accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in the State of Ohio

Bank of America does not have any financial centers in the state of Ohio. As of June 30, 2016, the bank held no deposits in the state. The primary depository financial institutions in Ohio with deposit shares greater than 5 percent include U.S. Bank (17.9 percent), Fifth Third Bank (14.1 percent), The Huntington National Bank (11.8 percent), PNC Bank (9.1 percent), JP Morgan Chase Bank (8.8 percent), and KeyBank (6.8 percent). Of the bank's 47 rating areas, the state of Ohio ranks 45th and accounts for 0 percent of the bank's total deposits. As of December 31, 2016, BANA operated two full-service ATMs in Ohio.

Refer to the community profiles for the state of Ohio in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Ohio

Examiners selected the Cleveland-Elyria, OH MSA for a full-scope review and the Cincinnati, OH MSA for a limited-scope review. During the evaluation period, Bank of America originated or purchased 7,868 home mortgage loans totaling \$1.2 billion, 6,577 small loans to businesses

³⁸ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

totaling \$155.4 million, 61 small loans to farms totaling \$1.6 million, and 4 CD loans totaling \$4.2 million. Based on loan volume originated or purchased, examiners weighted home mortgage lending, representing 54 percent of the overall volume, the most followed by small loans to businesses at 45 percent, and small loans to farms at less than 1 percent.

Examiners conducted telephone interviews with two local community service organizations representing neighborhood housing, employment, and community service needs. The community contacts noted the following needs across the state:

- Workforce development
- Education
- Affordable housing
- Health and human services (safe environment, medical care, transportation)
- Lines of credit
- Capacity building for small business, women, or minority owned businesses
- Second mortgages due to appraisal gaps

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Ohio is rated Outstanding based on excellent lending activity, excellent geographic distribution, good borrower income distribution, and a relatively high level of CD lending that has a significantly positive effect on the Lending Test rating. Performance in the limited-scope assessment area has a positive effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Ohio is excellent. Lending activity is excellent in the Cleveland-Elyria, OH MSA.

Cleveland-Elyria, OH MSA

Lending activity in the Cleveland-Elyria, OH MSA is excellent. According to peer mortgage data for 2016, the bank has a market share of 0.7 percent based on the number of home mortgage loans originated or purchased. The bank ranks 26th among 478 home mortgage lenders, which places it in the top 6 percent of lenders. According to peer small business data for 2016, the bank has a 2.1 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks 10th among 120 small business lenders, which places it in the top 9 percent of lenders in the MSA. The bank originated too few small loans to farms in the MSA for any meaningful analysis. Considering the bank has no financial centers in the assessment area, lending activity is excellent.

LENDING VOLUME		Geography: OHIO						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Cleveland, OH	56.02	4,141	597,005	3,965	86,785	21	320	2	444	8,129	684,554	0.00
Limited Review												
Cincinnati, OH	43.98	3,727	603,237	2,612	68,593	40	1,311	2	3,783	6,381	676,924	0.00
OHIO	100.00	7,868	1,200,242	6,577	155,378	61	1,631	4	4,227	14,510	1,361,478	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is excellent. The distribution is good in the Cleveland-Elyria, OH MSA. Excellent performance in the limited-scope assessment area has a positive effect on the overall geographic distribution conclusion.

Cleveland-Elyria, OH MSA

The geographic distribution of home mortgage loans in the Cleveland-Elyria, OH MSA is good. Performance is adequate in low-income geographies and good in moderate-income geographies, respectively. The distribution of the bank’s home mortgage loans in low-income geographies at 2.7 percent is lower than the 5.7 percent of owner-occupied units in low-income geographies, but it is higher than the 1.9 percent performance of aggregate lenders. The distribution of the bank’s home mortgage loans in moderate-income geographies at 11.5 percent is lower than the 13.8 percent of owner-occupied units in moderate-income geographies, but it is higher than the 9.3 percent performance of aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Cleveland-Elyria OH MSA	1,460	227,778	54.7	56,981	5.7	2.7	1.9	13.8	11.5	9.3	42.0	41.3	41.3	38.5	44.5	47.5	0.0	0.0	0.0
LS Cincinnati OH MSA	1,209	208,315	45.3	56,269	3.0	3.2	1.9	16.0	14.9	12.4	45.1	44.8	42.5	35.9	37.1	43.2	0.0	0.0	0.0
Total	2,669	436,093	100.0	113,250	4.5	2.9	1.9	14.8	13.0	10.8	43.3	42.9	41.9	37.4	41.1	45.3	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The distribution is adequate in the Cleveland-Elyria, OH MSA. Good performance in the limited-scope assessment area has a positive effect on the overall geographic distribution of small loans businesses.

Cleveland-Elyria, OH MSA

The geographic distribution of small loans to businesses in the Cleveland-Elyria, OH MSA is adequate. Performance is adequate in both low- and moderate-income geographies. The distribution in low-income geographies at 5.5 percent is lower than the 7.6 percent of businesses in low-income geographies and it is slightly lower than the 6.1 percent performance for aggregate lenders. The distribution in moderate-income geographies at 9.6 percent is lower than the 13 percent of businesses in moderate-income geographies and it is slightly lower than the 11.3 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Cleveland-Elyria OH MSA	2,445	54,603	61.4	38,020	7.6	5.5	6.1	13.0	9.6	11.3	38.4	39.7	36.2	40.6	45.1	46.2	0.4	0.2	0.2
LS Cincinnati OH MSA	1,555	41,667	38.9	31,484	6.3	6.2	5.9	20.6	16.7	17.6	38.4	35.8	35.8	34.7	41.3	40.7	0.0	0.0	0.0
Total	4,000	96,270	100.0	69,504	7.0	5.8	6.0	16.3	12.4	14.2	38.4	38.2	36.1	38.1	43.6	43.7	0.2	0.1	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

In the Cleveland-Elyria, OH MSA, the bank did not originate or purchase enough loan volume to provide a meaningful analysis.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Cleveland-Elyria OH MSA	13	272	34.2	155	2.5	0.0	0.6	7.9	0.0	3.2	44.3	30.8	46.5	45.3	69.2	49.7	0.0	0.0	0.0
LS Cincinnati OH MSA	25	1,209	67.7	200	2.4	0.0	0.0	13.4	14.3	9.5	54.5	28.0	64.5	29.7	60.0	26.0	0.0	0.0	0.0
Total	38	1,481	100.0	355	2.5	0.0	0.3	10.5	9.7	6.8	49.1	28.9	56.6	38.0	63.2	36.3	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is excellent. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Cleveland-Elyria, OH MSA.

Cleveland-Elyria, OH MSA

The distribution of home mortgage loans by borrower income in the Cleveland-Elyria, OH MSA is good. The distribution is adequate for low-income borrowers and excellent for moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 10.5 percent is lower than the 21.7 percent of low-income families, but higher than the 7.6 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 17.7 percent is higher than the 17.3 percent of moderate-income families and it is slightly lower than the 18 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Cleveland-Elyria OH MSA	1,460	227,778	54.7	56,981	21.7	10.5	7.6	17.3	17.7	18.0	20.7	20.4	20.2	40.3	36.4	39.1	0.0	14.9	15.2
LS Cincinnati OH MSA	1,209	208,315	45.3	56,269	21.0	11.7	6.8	17.0	20.8	16.5	20.7	18.4	18.3	41.2	32.9	40.7	0.0	16.1	17.7
Total	2,669	436,093	100.0	113,250	21.4	11.1	7.2	17.2	19.1	17.2	20.7	19.5	19.3	40.7	34.8	39.9	0.0	15.5	16.4

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s small loans to businesses originations and purchases.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. Performance in the Cleveland-Elyria, OH MSA is good. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 38 percent of its small loans to businesses.

Cleveland-Elyria, OH MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Cleveland-Elyria, OH MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 46.4 percent is lower than the 76.3 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is slightly stronger than the 45.1 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Cleveland-Elyria OH MSA	2,445	54,603	61.1	38,020	76.3	46.4	45.1	6.5	17.0	17.2	36.6
LS Cincinnati OH MSA	1,555	41,667	38.9	31,484	75.4	44.0	46.3	6.2	15.2	18.4	40.8
Total	4,000	96,270	100.0	69,504	75.9	45.5	45.7	6.4	16.3	17.7	38.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The bank did not originate or purchase enough loans in the full-scope area to draw a meaningful comparison.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Cleveland-Elyria OH MSA	13	272	34.8	155	96.6	50.0	60.0	2.1	20.0	1.3	61.5
LS Cincinnati OH MSA	25	1,209	65.8	200	97.3	40.0	54.5	1.5	13.3	1.2	52.0
Total	38	1,481	100.0	355	96.9	36.8	56.9	1.9	13.0	1.3	55.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a significantly positive effect on the lending performance in the state of Ohio.

Cleveland-Elyria, OH MSA

In the Cleveland-Elyria, OH MSA, CD lending has a significantly positive effect on the lending performance in the assessment area. The bank originated two CD loans totaling \$444,000 that primarily support community services. Considering the bank has no customer deposits in the assessment area, the bank originated a relatively high dollar volume of CD loans.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Lending under the MHA and HARP programs accounted for 83 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending test performance in the Cincinnati, OH MSA is consistent with the Outstanding Lending Test performance in the state of Ohio. Excellent lending test performance in the Cincinnati, OH MSA positively affected the overall Lending Test performance in the state of Ohio.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank’s level of qualified investments.

The bank’s performance under the Investment Test in the state of Ohio is rated Outstanding. Based on a full-scope review, the bank’s performance in the Cleveland-Elyria, OH MSA is excellent. Performance in the limited-scope assessment area has a neutral effect on the state rating.

Cleveland- Elyria, OH MSA

In the Cleveland-Elyria, OH MSA, Bank of America has an excellent level of community development investments. The bank made 30 investments during the current evaluation period totaling \$2.5 million. In addition, the bank has 14 CD investments totaling \$480,000 it made during a prior evaluation period that are still outstanding and continue to benefit the community. Outstanding prior period and current period investments total \$2.9 million. Approximately \$2 million or 83 percent of the current period investment dollars in the MSA supported community services. Approximately \$417,000 or 17 percent of the investment dollars in the MSA also supported 12 units of affordable housing. The majority of current period investments are neither innovative nor complex. Approximately \$1.6 million or 65 percent of the investment dollars were investments in CDFIs.

Examples of community development investments include:

- The bank invested \$1.3 million in Finance Fund Capital Corporation, a certified CDFI based in Columbus, OH that provides financing to small businesses in low-income communities throughout the state of Ohio. The CDFI used the investment for its small business loan programs and its healthy food and affordable housing financing initiatives.
- The bank invested \$3 million in the National Federation of Community Development Credit Unions (the Federation) of which the bank allocated \$250,000 to the Cleveland-Elyria, OH MSA. The Federation is a certified CDFI with a mission to help low- and moderate-income individuals and communities achieve financial independence through Community Development Credit Unions (CDCUs). CDCUs are required to have a majority of their members earn at or below 80 percent of the median family income.
- The bank made a \$100,000 grant to the Edwins Second Chance Life Skills Center. The organization focuses on offering comprehensive educational and life-skills support services for people with criminal records. Their goal is to provide educational services that will cause students to seek and find success in the workplace. This grant is the first payment of a two-year \$200,000 commitment. According to the organization, all of the individuals served are recently incarcerated and are wards of the state.

Table 14. Qualified Investments								2012-2016	
QUALIFIED INVESTMENTS		Geography: OHIO				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Cleveland, OH	14	480	30	2,457	44	2,937	32.33	0	0
Limited Review									
Cincinnati, OH	3	100	24	4,519	27	4,618	50.84	0	0
OHIO - Statewide	0	0	19	158	19	158	1.74	0	0
OHIO - Non Assessed	20	686	41	684	61	1,370	15.09	0	0
OHIO	37	1,266	114	7,818	151	9,084	100.00	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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Cincinnati, OH MSA is excellent and consistent with the Outstanding Investment Test performance in the state of Ohio.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Ohio is rated Low Satisfactory. Service Test performance is adequate in the Cleveland-Elyria, OH MSA. Performance in the limited-scope assessment area has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Cleveland-Elyria, OH MSA

In the Cleveland-Elyria, OH MSA, the bank's delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank's retail presence in the assessment area is limited to one full-service ATM located in a moderate-income geography. Given the bank's limited presence in the assessment area, augmented by alternative delivery systems, overall accessibility is reasonable.

The bank's alternative delivery systems including the full-service ATM, telephone, online, mobile, and text banking have a significantly positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customer's residency. In three of six ADS platforms, the percentage of customers in low- and moderate-income geographies using the platform exceeded the overall percentage of the population in low- and moderate-income geographies.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Cleveland-Elyria OH MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	104	16.4	215,605	10.4	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	135	21.2	361,821	17.4	0	0.0	1	100.0	0	0.0	0	0.0
Middle	230	36.2	804,100	38.7	0	0.0	0	0.0	0	0.0	0	0.0
Upper	162	25.5	695,586	33.5	0	0.0	0	0.0	0	0.0	0	0.0
NA	5	0.8	128	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	636	100.0	2,077,240	100.0	0	100.0	1	100.0	0	100.0	0	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Cleveland-Elyria, OH MSA

In the Cleveland-Elyria, OH MSA, the bank provides a relatively high level of community development services. During the evaluation period, the bank participated with community development organizations to provide 34 community development services targeted to low- and moderate-income individuals. Employees provided one financial education workshop and one foreclosure prevention workshop for 85 individuals. Employees participated in 25 webinars and workshops with non-profit organizations to help the organizations with capacity building. One employee served on the board of a community organization. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Cincinnati, OH MSA is consistent with the Low Satisfactory Service Test performance in the state of Ohio due to the bank’s limited retail presence in the assessment area.

State of Oklahoma

CRA Rating for Oklahoma³⁹: **Outstanding**
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Good volume of loans originated or purchased within the assessment areas;
- Excellent distribution of loans by geography and good distribution of loans by borrower income or business/farm revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in the State of Oklahoma

The state of Oklahoma is Bank of America's 27th largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$4.3 billion or 0.4 percent of its total domestic deposits in financial centers within the state of Oklahoma. Of the 227 depository financial institutions operating in the state of Oklahoma, Bank of America, with a deposit market share of 5.2 percent, is the sixth largest. The bank's primary competitors for deposits in Oklahoma with deposit shares greater than 5 percent include BOKF (13.9 percent), BancFirst (7.2 percent), Arvest Bank (6 percent), JP Morgan Chase Bank (5.8 percent), and MidFirst Bank (5.7 percent). As of December 31, 2016, BANA operated 31 financial centers and 57 full service ATMs in Oklahoma.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Tulsa, OK MSA, Bank of America reported an additional \$400 million in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

³⁹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the community profiles for the state of Oklahoma in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Oklahoma

Examiners selected two assessment areas for full-scope reviews and the remaining two assessment areas for limited-scope reviews. The full-scope assessment areas selected were the Oklahoma City, OK MSA and Tulsa, OK MSA. Examiners based the conclusions and ratings on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 8,633 home mortgage loans totaling \$1.3 billion, 10,328 small loans to businesses totaling \$211.6 million, 153 small loans to farms totaling \$1.6 million, and 10 CD loans totaling \$29 million. Based on loan volume, examiners weighted small loans to businesses, representing 54 percent of the volume, the most followed by home mortgage lending at 45 percent, and small loans to farms at less than 1 percent.

Examiners conducted telephone interviews with two community services agencies representing neighborhood housing, employment, and community service needs. The community contacts noted that affordable housing and affordable credit products, skilled labor in carpentry and maintenance professions, and community development services continue to be a concern across the state. A review of the bank's investments noted the bank is active in the state in providing affordable housing assistance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Oklahoma is rated High Satisfactory, based on good lending activity, excellent geographic distribution, and good borrower income distribution. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Oklahoma is good. Lending activity is excellent in the Oklahoma City, OK MSA and adequate in the Tulsa, OK MSA. Performance in the Tulsa, OK MSA carried more weight in arriving at the adequate performance overall.

Oklahoma City, OK MSA

Lending activity in the Oklahoma City, OK MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 6.2 percent. The bank ranks fifth among 68 depository financial institutions, which places it in the top 8 percent of

institutions. According to peer mortgage data for 2016, the bank has a market share of 1.3 percent based on the number of home mortgage loans originated or purchased. The bank ranks 20th among 453 home mortgage lenders, which places it in the top 5 percent of lenders competing for loans. According to peer small business data for 2016, the bank has a 5.2 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks eighth among 125 small business lenders, which places it in the top 7 percent of lenders in the MSA. For small loans to farms, the bank has a market share of 1.7 percent based on the number of small loans to farms originated or purchased. The bank ranks eighth among 25 farm lenders, which places it in the top 32 percent of lenders. Considering the bank’s higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

Tulsa, OK MSA

Lending activity in the Tulsa, OK MSA is good. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 10.1 percent. The bank ranks second among 55 depository financial institutions in the assessment area, which places it in the top 4 percent of 55 institutions. According to peer mortgage data for 2016, the bank has a market share of 1.4 percent based on the number of home mortgage loans originated or purchased. The bank ranks 17th among 422 home mortgage lenders, which places it in the top 5 percent of lenders competing for loans. According to peer small business data for 2016, the bank has a 5 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks eighth among 107 small business lenders, which places it in the top 8 percent of lenders in the MSA. According to peer farm data for 2016, the bank has a market share of 1.1 percent based on the number of small loans to farms originated or purchased. The bank ranks 10th among 15 farm lenders, which places it in the bottom 33 percent of lenders. Considering the bank’s lower ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is good.

LENDING VOLUME		Geography: OKLAHOMA						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Oklahoma City, OK	54.97	4,717	677,730	5,693	109,438	100	802	2	11,920	10,512	799,890	42.29
Tulsa, OK	37.66	3,131	497,239	4,039	90,641	27	251	6	14,012	7,203	602,143	56.68
Limited Review												
Lawton, OK	3.96	534	63,546	216	1,992	8	63	0	0	758	65,601	1.03
Oklahoma Non-MSA	3.40	251	25,774	380	9,510	18	438	2	3,160	651	38,882	0.00
OKLAHOMA	100.00	8,633	1,264,289	10,328	211,581	153	1,554	10	29,092	19,124	1,506,516	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan

originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is adequate. The distribution is adequate in the Oklahoma City, OK MSA and good in the Tulsa, OK MSA.

Oklahoma City, OK MSA

The geographic distribution of home mortgage loans in the Oklahoma City, OK MSA is adequate. Performance is adequate in low-income geographies and adequate in moderate-income geographies. The distribution of the bank’s home mortgage loans in low-income geographies at 1.3 percent is lower than the 3.2 percent of owner-occupied housing units in low-income geographies, but it is slightly higher than the 1.2 percent performance of aggregate lenders. The distribution in moderate-income geographies at 12.7 percent is also lower than the 18.7 percent of owner-occupied housing units in moderate-income geographies and it is slightly lower than the 13 percent performance for aggregate lenders.

Tulsa, OK MSA

The geographic distribution of home mortgage loans in the Tulsa, OK MSA is good. Performance is adequate in low-income geographies and good in moderate-income geographies. The distribution of the bank’s home mortgage loans in low-income geographies at 1.7 percent is lower than the 3.4 percent of owner-occupied housing units in low-income geographies; however, it is slightly higher than the 1.4 percent performance of aggregate lenders. The distribution in moderate-income geographies at 14.6 percent is also lower than the 20.9 percent of owner-occupied housing units in moderate-income geographies; however, it is higher than the 13 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Oklahoma City OK MSA	2,081	318,695	55.7	48,823	3.2	1.3	1.2	18.7	12.7	13.0	45.0	40.2	41.5	33.1	45.7	44.2	0.0	0.0	0.0
FS Tulsa OK MSA	1,394	232,317	37.3	29,182	3.4	1.7	1.4	20.9	14.6	13.0	40.8	34.7	40.0	34.9	49.0	45.7	0.0	0.0	0.0
LS Lawton OK MSA	231	25,670	6.2	3,241	2.7	2.6	1.4	10.5	8.7	6.4	50.8	54.1	47.3	36.0	34.6	44.7	0.0	0.0	0.2
LS Oklahoma Non-MSA	28	3,349	0.8	1,009	0.0	0.0	0.0	24.8	25.0	27.2	75.2	75.0	72.8	0.0	0.0	0.0	0.0	0.0	0.0
Total	3,734	580,031	100.0	82,255	3.2	1.6	1.3	19.3	13.3	12.9	44.1	39.3	41.6	33.4	45.9	44.2	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Oklahoma City, OK MSA and Tulsa, OK MSA.

Oklahoma City, OK MSA

The geographic distribution of small loans to businesses in the Oklahoma City, OK MSA is excellent. Performance is excellent in both low- and moderate-income geographies. The distribution in low-income geographies at 5.9 percent is higher than the 5.4 percent of businesses in low-income geographies and it is consistent with the 5.9 percent performance for aggregate lenders. The distribution in moderate-income geographies at 20.4 percent is slightly higher than the 20 percent of businesses in moderate-income geographies and it is higher than the 18.3 percent performance for aggregate lenders.

Tulsa, OK MSA

The geographic distribution of small loans to businesses in the *Tulsa, OK MSA* MSA is excellent. Performance is excellent in both low- and moderate-income geographies. The distribution in low-income geographies at 5.7 percent is higher than the 5.3 percent of businesses in low-income geographies and it is slightly higher than the 5.5 percent performance for aggregate lenders. The distribution in moderate-income geographies at 22.2 percent is slightly lower than the 23.7 percent of businesses in moderate-income geographies and exceeds the 21.2 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate
FS Oklahoma City OK MSA	3,598	70,345	57.6	23,047	5.4	5.9	5.9	20.0	20.4	18.3	38.3	33.5	35.5	35.2	39.8	39.4	1.2	0.5	1.0
FS Tulsa OK MSA	2,458	51,383	39.3	15,667	5.3	5.7	5.5	23.7	22.2	21.2	34.0	30.5	33.1	37.0	41.7	40.2	0.0	0.0	0.0
LS Oklahoma Non-MSA	64	938	1.0	548	0.0	0.0	0.0	19.1	29.7	22.1	80.9	70.3	77.9	0.0	0.0	0.0	0.0	0.0	0.0
LS Law ton OK MSA	131	1,288	2.1	1,489	14.3	11.5	12.1	20.0	22.9	19.7	41.3	44.3	35.1	24.2	21.4	33.0	0.3	0.0	0.1
Total	6,251	123,954	100.0	40,751	5.6	5.9	5.9	21.6	21.3	19.5	37.1	32.9	35.1	35.2	39.7	38.9	0.6	0.3	0.6

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is adequate. The distribution is poor in the Oklahoma City, OK MSA and good in the Tulsa, OK MSA.

Oklahoma City, OK MSA

The geographic distribution of small loans to farms in the Oklahoma City, OK MSA is poor. Performance is poor in low-income geographies and very poor in moderate-income geographies. The distribution in low-income geographies at 0 percent is lower than the 1.9 percent of farms in low-income geographies and it is lower than the 1.3 percent performance for aggregate lenders. The distribution in moderate-income geographies at 0 percent is lower than the 15.2 percent of farms in moderate-income geographies and it is lower than the 12.7 percent performance for aggregate lenders.

Tulsa, OK MSA

The geographic distribution of small loans to farms in the Tulsa, OK MSA is good. Performance is poor in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 0 percent is lower than the 2.2 percent of farms in low-income geographies and it is lower than the 0.3 percent performance for aggregate lenders. The distribution in moderate-income geographies at 43.8 is significantly higher than the 18.8 percent of farms in moderate-income geographies and it is significantly higher than the 22.7 percent performance for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS Oklahoma City OK MSA	55	416	67.9	890	1.9	0.0	1.3	15.2	0.0	12.7	48.6	67.3	67.5	34.1	32.7	18.4	0.1	0.0	0.0
FS Tulsa OK MSA	16	171	21.1	379	2.2	0.0	0.3	18.8	43.8	22.7	48.8	37.5	58.6	30.2	25.0	18.5	0.0	0.0	0.0
LS Oklahoma Non-MSA	3	12	3.7	139	0.0	0.0	0.0	19.9	0.0	15.8	80.1	100.0	84.2	0.0	0.0	0.0	0.0	0.0	0.0
LS Law ton OK MSA	6	52	10.7	173	3.1	0.0	2.3	5.7	0.0	2.9	51.6	100.0	65.3	39.6	100.0	29.5	0.0	0.0	0.0
Total	81	656	100.0	1,581	2.1	0.0	1.1	16.0	8.6	14.3	49.5	64.2	66.6	32.4	27.2	18.0	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the "Inside/Outside Ratio" section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Oklahoma City, OK MSA and Tulsa, OK MSA.

Oklahoma City, OK MSA

The distribution of home mortgage loans by borrower income in the Oklahoma City, OK MSA is good. The distribution is adequate for low-income borrowers and excellent for moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 9.6 percent is lower than the 21.3 percent of low-income families, but higher than the 5.2 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 19.5 percent is higher than the 17.8 percent of moderate-income families and it is higher than the 15.4 percent performance for aggregate lenders.

Tulsa, OK MSA

The distribution of home mortgage loans by borrower income in the Tulsa, OK MSA is good. The distribution is adequate for low-income borrowers and excellent for moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 8.1 percent is lower than the 21.1 percent of low-income families, but is higher than the 5.1 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 18.7 percent is higher than the 17.9 percent of moderate-income families and it is higher than the 16.8 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate	% Families	% Bank Loans	Aggre gate
FS Oklahoma City OK MSA	2,081	318,695	55.7	48,823	21.3	9.6	5.2	17.8	19.5	15.4	20.6	21.1	20.5	40.4	41.1	37.9	0.0	8.7	21.0
FS Tulsa OK MSA	1,394	232,317	37.3	29,182	21.1	8.1	5.1	17.9	18.7	16.8	20.4	20.6	20.5	40.6	42.2	39.2	0.0	10.4	18.4
LS Law ton OK MSA	231	25,670	6.2	3,241	21.9	6.5	3.5	17.6	19.0	10.2	21.3	16.5	18.9	39.3	25.1	36.6	0.0	32.9	30.8
LS Oklahoma Non-MSA	28	3,349	1.0	1,009	29.5	10.7	4.3	17.3	14.3	15.8	20.9	25.0	21.3	32.3	35.7	37.9	0.0	14.3	20.8
Total	3,734	580,031	100.0	82,255	21.4	8.9	5.1	17.8	19.1	15.7	20.5	20.7	20.5	40.3	40.5	38.3	0.0	10.8	20.4

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The distribution is good in the Oklahoma City, OK MSA and good in the Tulsa, OK MSA.

The bank did not collect or consider the gross annual revenues in the underwriting of approximately 35 percent of its small loans to businesses.

Oklahoma City, OK MSA

The distribution in Oklahoma City, OK MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 54.8 percent is lower than the 77.6 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 45.1 percent for aggregate lenders, overall performance is good.

Tulsa, OK MSA

The distribution in the Tulsa, OK MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 52.4 percent is lower than the 75 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 46.3 percent for aggregate lenders, overall performance is good.

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
FS Oklahoma City OK MSA	3,598	70,345	57.6	23,047	77.6	54.8	45.1	4.9	10.9	17.5	34.4
FS Tulsa OK MSA	2,458	51,383	39.3	15,667	75.0	52.4	46.3	5.0	11.8	20.0	35.7
LS Oklahoma Non-MSA	64	938	1.1	548	79.1	34.4	61.5	3.6	10.4	17.3	57.8
LS Law ton OK MSA	131	1,288	2.5	1,489	73.7	54.2	63.6	4.0	10.7	22.3	35.1
Total	6,251	123,954	100.0	40,751	76.4	53.6	46.4	4.9	11.2	18.7	35.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is poor. The distribution is poor in the Oklahoma City, OK MSA and Tulsa, OK MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 48 percent of its small loans to farms.

Oklahoma City, OK MSA

The distribution in the Oklahoma City, OK MSA is poor. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 54.5 percent is lower than the 97.2 percent of farms with gross annual revenues of \$1 million or less. Considering the bank’s distribution is also lower than the 83.6 percent for aggregate lenders, overall performance is poor.

Tulsa, OK MSA

The distribution in the Tulsa, OK MSA is poor. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 50 percent is lower than the 97.2 percent of farms with gross annual revenues of \$1 million or less. Considering the bank’s distribution is also lower than the 78.1 percent for aggregate lenders, overall performance is poor.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Oklahoma City OK MSA	55	416	76.0	890	97.2	54.5	83.6	1.6	5.3	1.2	43.6
FS Tulsa OK MSA	16	171	21.4	379	97.2	50.0	78.1	1.2	0.0	1.6	66.7
LS Oklahoma Non-MSA	3	12	3.7	139	97.1	0.0	94.2	1.6	0.0	1.3	100.0
LS Law ton OK MSA	7	57	16.7	173	98.7	100.0	85.0	0.5	0.0	0.8	100.0
Total	81	656	100.0	1,581	97.3	50.6	83.4	1.4	4.0	1.3	48.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect on the lending performance in the state of Oklahoma. The bank met the communities’ credit needs primarily through retail lending.

Oklahoma City, OK MSA

In the Oklahoma City, OK MSA, CD lending has a neutral effect on the lending performance in the assessment area. The bank originated two CD loans totaling \$11.9 million that primarily support affordable housing. One loan is an extension of the other loan, so the benefit to the community is actually only about \$6 million. CD lending helped to finance the development of 48 units of affordable housing and it represents 5.2 percent of the allocated Tier 1 Capital.

Tulsa, OK MSA

In the Tulsa, OK MSA, CD lending has a neutral effect on the lending performance in the assessment area. The bank originated six CD loans totaling \$14 million that primarily support affordable housing. CD loans helped to finance the development of 272 units of affordable housing. CD lending represents 5.4 percent of the allocated Tier 1 Capital after adjusting for \$400 million in corporate deposits that did not derive from the assessment area.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Oklahoma, lending under the MHA and HARP programs accounted for 71 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Lawton, OK MSA is consistent with the High Satisfactory Lending Test performance in the state of Oklahoma. Lending Test performance in the Oklahoma Non-MSA is stronger than the overall High Satisfactory Lending Test performance in the state of Oklahoma. Performance is stronger primarily due to the significantly positive effect CD lending has on the lending performance in the Oklahoma Non-MSA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test in the state of Oklahoma is rated Outstanding. Investment performance is excellent in the Oklahoma City, OK MSA and Tulsa, OK MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Oklahoma City, OK MSA

In the Oklahoma City, OK MSA, Bank of America has an excellent level of CD investments. The bank made 87 investments during the current evaluation period totaling \$22.8 million. Approximately \$22.4 million or 98 percent of the current period investment dollars in the MSA supported 215 units of affordable housing. In addition, the bank has 47 CD investments totaling \$3.3 million it made during a prior evaluation period that are still outstanding and continue to benefit the community. Outstanding prior period and current period investments total \$26.1 million or 11.4 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$15.2 million or 67 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$6.9 million in a LIHTC for new construction of Bocage senior apartments, a 58-unit housing development in Norman, OK for seniors aged 62 and older. The development has 48 units restricted to incomes at or below 60 percent of the area median income. The remaining 10 units are available at market rates.
- The bank invested nearly \$116,000 in a fund that makes direct and indirect investments in partnerships that own affordable housing projects throughout the United States. LIHTCs support these projects. This transaction represents funds used toward the Landings at Pebble Creek, which provides 48 units of affordable housing.
- The bank made \$55,000 in multiple smaller grants to the Oklahoma City Public Schools Foundation (the Foundation). The Foundation's mission is to advance excellence,

create champions, and build strong community support for lasting change in their schools. Partners of the Foundation provide valuable and unrestricted support for numerous programs and initiatives. The various grants helped to finance those programs and initiatives. According to the National Center for Education Statistics, 86 of the 93 schools in the Oklahoma City Public School District have free or reduced price lunch rates at or above 54 percent.

Tulsa, OK MSA

In the Tulsa, OK MSA, Bank of America has an excellent level of CD investments. The bank made 108 investments during the evaluation period totaling \$27.7 million. Approximately \$27.2 million or 98 percent of the current period investment dollars in the MSA supported 591 units of affordable housing. In addition, the bank has 28 CD investments totaling \$8.1 million it made during a prior evaluation period that are still outstanding and continue to benefit the community. Outstanding prior period and current period investments total \$35.8 million or 13.9 percent of the bank's Tier 1 Capital allocated to the assessment area after adjusting for approximately \$400 million in corporate deposits that did not derive from the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$18.2 million or 66 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$8.6 million into a Section 42 LIHTC fund that supported a housing project, which provided 58 units of affordable housing in the MSA.
- The bank invested more than \$80,000 in a fund that makes direct and indirect investments in partnerships that own affordable housing projects throughout the U.S. The partnerships use LIHTCs to help fund those projects. This transaction represents funds used toward the Bradford Apartments, which provides 192 units of affordable housing in the MSA.
- The bank provided nearly \$61,000 in grants to City Year, an education-focused nonprofit organization that partners with public schools to provide full-time targeted intervention for students at risk of dropping out of school. This funding is part of a 2-year \$1 million commitment the bank made to support the national Diplomas Now program that addresses the dropout crisis in high poverty neighborhoods. In schools the program serves, a majority of the students are eligible for free or reduced lunches.

Table 14. Qualified Investments								2012-2016	
QUALIFIED INVESTMENTS		Geography: OKLAHOMA				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Oklahoma City, OK	47	3,294	87	22,792	134	26,086	36.22	1	4,876
Tulsa, OK	28	8,115	108	27,668	136	35,783	49.68	0	0
Limited Review									
Lawton, OK	5	217	7	177	12	394	0.55	0	0
Oklahoma Non-MSA	0	0	8	122	8	122	0.17	0	0
OKLAHOMA - Statewide	1	50	10	64	11	114	0.16	0	0
OKLAHOMA - Non Assessed	17	7,688	17	1,843	34	9,531	13.23	0	0
OKLAHOMA	98	19,365	237	52,665	335	72,030	100.00	1	4,876

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Oklahoma Non-MSA is excellent and consistent with the Outstanding Investment Test performance in the state of Oklahoma. Investment performance in the Lawton, OK MSA is weaker than the overall Outstanding Investment Test performance in the state of Oklahoma. Performance is weaker due to lower levels of CD investments relative to the bank's size and resources in the assessment area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Oklahoma is rated Outstanding. Service Test performance is excellent in the Oklahoma City, OK MSA and Tulsa, OK MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Oklahoma City, OK MSA

In the Oklahoma City, OK MSA, the bank's delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 15 financial centers with the distribution of the population. The bank has two financial centers in low-income geographies representing 13.3 percent of its financial centers. Low-income geographies have 5.5 percent of the assessment area's population. In moderate-income geographies, the bank has three financial centers or 20 percent of its financial centers compared with 24 percent of the population.

Examiners also considered the bank’s alternative delivery systems including cash dispensing and full-service ATMs, telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Alternative delivery systems have a positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customer’s residency. In two of six ADS platforms, the percentage of customers in low- and moderate-income geographies using the platform exceeded the percentage of the population in low- and moderate-income geographies.

The bank has seven financial centers located in middle- and upper-income geographies that are adjacent to or in very close proximity to low- and moderate-income geographies. Six financial centers are adjacent to moderate-income geographies and one financial center is adjacent to low-income geographies. The adjacent financial centers help improve accessibility of retail banking services in low-and moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank closed three financial centers; two in upper-income geographies and one in a census tract not defined.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are consistent throughout the assessment area. All financial centers are open 9:00 am to 4:00 pm Monday through Thursday and 9:00 am to 5:00 pm on Friday. Financial centers that are open for Saturday banking are open 9:00 am to 12:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Oklahoma City OK MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	32	8.8	69,342	5.5	2	13.3	4	14.3	0	0.0	0	0.0
Moderate	97	26.7	301,199	24.0	3	20.0	7	25.0	0	0.0	0	0.0
Middle	139	38.3	521,862	41.6	6	40.0	8	28.6	0	0.0	0	0.0
Upper	91	25.1	359,351	28.7	3	20.0	8	28.6	0	0.0	2	66.7
NA	4	1.1	1,233	0.1	1	6.7	1	3.6	0	0.0	1	33.3
Totals	363	100.0	1,252,987	100.0	15	100.0	28	100.0	0	100.0	3	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Tulsa, OK MSA

In the Tulsa, OK MSA, the bank’s delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 15 financial centers with the distribution of the population. The bank has one financial center in a low-income geography representing 6.7 percent of its financial centers. Low-income geographies have 6.1 percent of the assessment area’s population. In moderate-income geographies, the bank has six or 40 percent of its financial centers compared with 25.3 percent of the population.

Examiners also considered the bank’s alternative delivery systems including cash dispensing and full-service ATMs, telephone, online, mobile and text banking in evaluating accessibility to the bank’s products and services. Alternative delivery systems have a positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customer’s residency. In two of six ADS platforms, the percentage of customers in low- and moderate-income geographies using the platform exceeded the percentage of the population in low- and moderate-income geographies.

The bank has two financial centers located in middle- and upper-income geographies that are adjacent to or in very close proximity to moderate-income geographies. The adjacent financial centers help improve accessibility of retail banking services in moderate-income geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank closed one financial center in a moderate-income geography. Despite the closure, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are consistent throughout the assessment area. All financial centers are open 9:00 am to 4:00 pm Monday through Thursday and 9:00 am to 5:00 pm on Friday. All financial centers except one are open for Saturday banking 9:00 am to 12:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Tulsa OK MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	20	7.4	57,018	6.1	1	6.7	1	3.8	0	0.0	0	0.0
Moderate	77	28.3	237,377	25.3	6	40.0	11	42.3	0	0.0	1	100.0
Middle	99	36.4	358,331	38.2	4	26.7	7	26.9	0	0.0	0	0.0
Upper	76	27.9	284,752	30.4	4	26.7	7	26.9	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	272	100.0	937,478	100.0	15	100.0	26	100.0	0	100.0	1	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Oklahoma City, OK MSA

The bank provides a relatively high level of community development services. During the evaluation period, the bank participated with community development organizations to provide 34 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to two low- and moderate-income individuals, and provided four financial education workshops and one foreclosure prevention workshop for 179 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in five webinars and workshops with non-profit organizations to help the organizations with capacity building. In

addition, 20 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Tulsa, OK MSA

The bank provides a relatively high level of community development services. During the evaluation period, the bank participated with community development organizations to provide 37 community development services targeted to low- and moderate-income individuals. Employees provided a homebuyer education workshop to one low- or moderate-income individual, and provided 11 financial education workshops for 181 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in nine webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 16 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Lawton, OK MSA and Oklahoma Non-MSA is weaker than the overall Outstanding Service Test performance in the state of Oklahoma primarily due to the bank's limited retail banking presence in those assessment areas.

State of Oregon

CRA Rating for Oregon⁴⁰: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Excellent distribution of loans among geographies and good distribution to borrowers of different income levels throughout the state;
- Relatively high level of CD lending that has a positive effect on overall lending performance;
- Investment volume that reflects an excellent level of responsiveness to the needs in the state; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Oregon

The state of Oregon is Bank of America's 37th largest rating area based on its total deposits in the state when excluding deposits in the Portland-Vancouver-Hillsboro, OR-WA Multistate MSA. Examiners excluded the multistate MSA from the analysis of the state of Oregon because examiners evaluated the multistate MSA as a separate rating area. As of June 30, 2016, the bank maintained approximately \$999 million or 0.1 percent of its total domestic deposits in financial centers in areas of the state of Oregon that do not include the multistate MSA. Of the 31 depository financial institutions operating in the areas of the state that do not include the multistate MSA, Bank of America, with a deposit market share of 3.3 percent, is the 10th largest. BANA's primary banking competitors for deposits in Oregon with deposit market shares greater than 5 percent include Umpqua Bank (19.1 percent), U.S. Bank (17.2 percent), Wells Fargo Bank (14 percent), JPMorgan Chase Bank (7.7 percent), Bank of the Cascades (5.8 percent), and Columbia State Bank (5.5 percent). As of December 31, 2016, the bank operated 10 financial centers and 27 full-service ATMs in the areas of the state of Oregon that exclude the multistate MSA.

⁴⁰ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the community profiles for the state of Oregon in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Oregon

The bank has defined five assessment areas in the state of Oregon. Examiners selected the Bend-Redmond, OR MSA and Eugene, OR MSA for full-scope reviews. The remaining three assessment areas, Albany, OR MSA, Corvallis, OR MSA, and Salem, OR MSA, received limited-scope reviews. During the evaluation period, Bank of America originated or purchased 6,858 home mortgage loans totaling \$1.3 billion, 9,229 small loans to businesses totaling \$206.6 million, 407 small loans to farms totaling \$8.4 million, and 19 CD loans totaling \$14.6 million. Lending volumes include loans originated or purchased in the Eugene, OR MSA and Medford, OR MSA, which the bank no longer designates as assessment areas due to the closure or sale of all financial centers and deposit-taking ATMs in those communities. Based on loan volume, examiners weighted small loans to businesses, representing 56 percent of the volume, the heaviest, followed by home mortgage lending at 42 percent, and small loans to farms at 2 percent.

Examiners conducted telephone interviews with two community development organizations. The community contacts identified affordable housing, funding for the expansion of existing businesses, and funding for training programs to equip the workforce with knowledge and skills necessary to meet the demands of the growing and evolving job market in the state as primary credit needs in the communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OREGON

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Oregon is rated Outstanding, based on excellent lending activity, excellent geographic distribution, good borrower income distribution, and a high level of CD lending that positively affected overall performance under the Lending Test. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Oregon is excellent. Lending activity is excellent in the Bend-Redmond, OR MSA and Eugene, OR MSA.

Bend-Redmond, OR MSA

Lending activity in the Bend-Redmond, OR MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 8 percent. The bank ranks

fifth among 10 depository financial institutions in the assessment area, which places it in the 50th percentile of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.9 percent based on the number of home mortgage loans originated or purchased. The bank ranks 18th among 326 home mortgage lenders, which places it in the top 6 percent of mortgage lenders. Based on peer small business data for 2016, the bank has a market share of 7.5 percent of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fourth among 74 small business lenders, which places it in the top 6 percent of lenders. According to peer farm data for 2016, the bank has a market share of 11.8 percent based on the number of small loans to farms originated or purchased. The bank ranks third among nine farm lenders, which places the bank in the top 34 percent of lenders. Considering the bank’s higher ranking among all lenders for home mortgage loans, small loans to businesses, and small loans to farms relative to its ranking for deposits, overall lending activity is excellent.

Eugene, OR MSA

Lending activity in the Eugene, OR MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 3.7 percent. The bank ranks ninth among 10 depository financial institutions, which places it in the bottom 10 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.8 percent based on the number of home mortgage loans originated or purchased. The bank ranks 22nd among 231 mortgage lenders, which places it in the top 10 percent of mortgage lenders. Based on peer small business data for 2016, the bank has a market share of 3.2 percent of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks eighth among 47 small business lenders, which places it in the top 18 percent of lenders. According to peer farm data for 2016, the bank has a market share of 10.6 percent of small loans to farms based on the number of small loans to farms originated or purchased. The bank ranks third among 12 farm lenders, which places it in the top 25 percent of lenders. Considering the bank’s higher ranking among all lenders for home mortgage loans, small loans to businesses, and small loans to farms relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: OREGON						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Bend, OR	24.55	1,418	345,234	2,596	45,342	38	345	2	280	4,054	391,201	25.94
Eugene, OR	20.09	1,326	250,857	1,929	51,407	57	437	4	584	3,318	303,285	33.43
Medford, OR	7.95	667	128,014	626	14,077	17	1,311	2	420	1,312	143,822	0.00
Oregon Non-MSA	16.13	1,432	236,511	1,164	27,485	64	446	3	1,226	2,663	265,668	0.00
Limited Review												
Albany, OR	3.05	152	20,416	319	10,829	31	1,280	2	4,341	504	36,866	3.85
Corvallis, OR	5.35	332	70,766	524	14,063	25	154	3	656	884	85,639	11.61
Salem, OR	22.88	1,529	261,743	2,071	43,368	175	4,391	3	7,125	3,778	316,627	25.36
OREGON	100.00	6,858	1,313,541	9,229	206,571	407	8,364	19	14,633	16,513	1,543,109	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
 (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
 (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is good in the Bend-Redmond MSA and adequate in the Eugene, OR MSA.

Bend-Redmond, OR MSA

The geographic distribution of home mortgage loans within the Bend-Redmond, OR MSA is good. There are no low-income tracts in this assessment area. Examiners based the overall good conclusion on the good performance in moderate-income geographies. The distribution of home mortgage loans in moderate-income tracts at 9.7 percent is below the 11.8 percent of owner-occupied housing units in moderate-income geographies; however, the bank's performance is similar to aggregate lenders.

Eugene, OR MSA

The geographic distribution of home mortgage loans within the Eugene, OR MSA is adequate. Performance is poor in low-income geographies and good in moderate-income geographies. The distribution of home mortgage loans in low-income tracts at 0.9 percent is below the 1.4 percent of owner-occupied housing units in low-income geographies and below the 1.3 percent performance for aggregate lenders. The distribution of home mortgage loans in moderate-income geographies at 15.4 percent is below the 16.5 percent of owner-occupied housing units in moderate-income geographies, yet performance is similar to aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Bend-Redmond OR MSA	569	152,569	29.6	11,120	0.0	0.0	0.0	11.8	9.7	9.9	65.0	64.0	69.0	23.2	26.4	21.1	0.0	0.0	0.0
FS Eugene OR MSA	468	95,505	24.4	12,653	1.4	0.9	1.3	16.5	15.4	15.8	57.9	55.6	58.3	24.2	28.2	24.5	0.0	0.0	0.0
LS Albany OR MSA	152	20,416	7.9	4,375	0.0	0.0	0.0	10.1	11.8	11.5	75.2	66.4	67.7	14.7	21.7	20.8	0.0	0.0	0.0
LS Corvallis OR MSA	133	32,525	6.9	2,603	1.0	0.8	1.6	20.4	18.8	22.2	48.4	39.1	47.4	30.2	41.4	28.7	0.0	0.0	0.0
LS Salem OR MSA	600	111,025	31.2	15,048	0.0	0.0	0.0	11.9	12.5	11.4	60.2	54.3	59.1	28.0	33.2	29.5	0.0	0.0	0.0
Total	1,922	412,040	100.0	45,799	0.5	0.3	0.5	13.8	12.7	12.9	61.1	57.4	61.5	24.7	29.6	25.2	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Bend-Redmond, OR MSA and Eugene, OR MSA.

Bend-Redmond, OR MSA

The geographic distribution of small loans to businesses in the Bend-Redmond, OR MSA is excellent. The assessment area has no low-income geographies. Examiners based the overall conclusion on the excellent performance in moderate-income geographies. The distribution in moderate-income geographies at 18.7 percent is slightly below the 19.3 percent of businesses in moderate-income geographies; however, the bank’s performance exceeds the 16.2 percent for aggregate lenders.

Eugene, OR MSA

The geographic distribution of small loans to businesses in the Eugene, OR MSA is excellent. Performance is excellent in low- and moderate-income geographies. The distribution in low-income geographies at 5.9 percent exceeds the 3.5 percent of businesses in low-income geographies. The bank’s performance also exceeds the 3.1 percent for aggregate lenders. The distribution in moderate-income geographies at 26.9 percent is equal to the 26.9 percent of businesses in moderate-income geographies. In addition, the bank’s performance exceeds the 20.1 percent for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Bend-Redmond OR MSA	1,734	27,098	34.8	7,731	0.0	0.0	0.0	19.3	18.7	16.2	57.9	49.9	56.4	22.8	31.4	27.4	0.0	0.0	0.0
FS Eugene OR MSA	1,229	32,443	24.7	10,668	3.5	5.9	3.1	26.9	26.9	20.1	45.6	37.8	47.9	24.1	29.4	28.9	0.0	0.0	0.0
LS Albany OR MSA	319	10,829	6.4	3,059	0.0	0.0	0.0	16.5	20.4	11.4	68.4	63.0	69.3	15.1	16.6	19.2	0.0	0.0	0.0
LS Corvallis OR MSA	341	9,473	6.9	2,193	12.5	7.0	8.5	24.5	26.4	21.6	40.5	37.8	44.0	22.5	28.7	25.9	0.0	0.0	0.0
LS Salem OR MSA	1,355	26,676	27.2	9,787	0.0	0.0	0.0	21.0	21.0	16.8	56.9	56.1	55.9	22.2	23.0	27.2	0.0	0.0	0.0
Total	4,978	106,519	100.0	33,438	2.1	1.9	1.5	22.3	22.0	17.6	53.4	48.6	53.9	22.2	27.5	27.0	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

The overall geographic distribution of small loans to farms is adequate. Poor performance in limited-scope assessment areas negatively affected overall performance. The distribution is good in the Bend-Redmond, OR MSA and Eugene, OR MSA.

Bend-Redmond, OR MSA

The geographic distribution of small loans to farms in the Bend-Redmond, OR MSA is good. The assessment area has no low-income geographies. Examiners based the overall conclusion on the good performance in moderate-income geographies. The distribution in moderate-income geographies at 9.1 percent is below the 12.3 percent of farms in moderate-income geographies; however, the bank’s performance exceeds the 3.7 percent for aggregate lenders.

Eugene, OR MSA

The geographic distribution of small loans to businesses in the Eugene, OR MSA is good. Performance is adequate in low-income geographies and excellent in moderate-income geographies. Although the bank did not originate or purchase any small loans to farms in low-income geographies, the bank’s performance is consistent with aggregate performance. The distribution in moderate-income geographies at 18.4 percent exceeds the 14.5 percent of farms located in moderate-income geographies. In addition, the bank’s performance exceeds the 10.6 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Bend-Redmond OR MSA	30	311	12.5	82	0.0	0.0	0.0	12.3	9.1	3.7	56.3	36.7	50.0	31.4	56.7	46.3	0.0	0.0	0.0
FS Eugene OR MSA	38	316	17.0	113	2.0	0.0	0.0	14.5	18.4	10.6	63.5	71.1	71.7	20.0	13.3	17.7	0.0	0.0	0.0
LS Albany OR MSA	31	1,280	12.5	110	0.0	0.0	0.0	2.6	0.0	0.0	86.0	90.3	81.8	11.4	13.6	18.2	0.0	0.0	0.0
LS Corvallis OR MSA	18	119	7.1	34	1.0	0.0	0.0	14.7	0.0	14.7	66.8	77.8	73.5	17.5	22.2	11.8	0.0	0.0	0.0
LS Salem OR MSA	135	3,601	53.6	398	0.0	0.0	0.0	8.2	0.0	3.8	71.9	92.6	81.9	19.9	7.4	14.3	0.0	0.0	0.0
Total	252	5,627	100.0	737	0.6	0.0	0.0	9.9	3.6	4.7	69.6	81.3	76.4	20.0	15.1	18.9	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Bend-Redmond, OR MSA and Eugene, OR MSA.

Bend-Redmond, OR MSA

The distribution of home mortgage loans by borrower income in the Bend-Redmond, OR MSA is good. The distribution is adequate to low-income borrowers and it is good to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 8.1 percent is well below the 19.7 percent of low-income families in the MSA; however, the bank’s distribution exceeds the 2.1 percent for aggregate lenders. The proportion of the bank’s home mortgage loans to moderate-income borrowers at 13.2 percent is below the 17.3 percent of moderate-income families. Bank performance exceeds the 10.5 percent for aggregate lenders.

Eugene, OR MSA

The distribution of home mortgage loans by borrower income in the Eugene, OR MSA is good. The distribution is adequate to low-income borrowers and it is good to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 7.7 percent is lower than the 21.3 percent of low-income families in the MSA; however, the bank’s distribution exceeds the 3.1 percent for aggregate lenders. The proportion of the bank’s home mortgage loans to moderate-income borrowers at 15.4 percent is lower than the 18.1 percent of moderate-income families. Bank performance exceeds the 13.3 percent for aggregate lenders.

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The distribution is good in the Bend-Redmond, OR MSA and Eugene, OR MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 32 percent of its small loans to businesses.

Bend-Redmond, OR MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Bend-Redmond, OR MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 54.6 percent is lower than the 81.6 percent of businesses with gross annual revenues of \$1 million or less. However, the bank's distribution is higher than the 39.8 percent for aggregate lenders.

Eugene, OR MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Eugene, OR MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 48.7 percent is lower than the 79.6 percent of businesses with gross annual revenues of \$1 million or less. However, the bank's distribution is higher than the 36.8 percent for aggregate lenders.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Bend-Redmond OR MSA	1,734	27,098	34.8	7,731	81.6	54.6	39.8	3.7	11.5	14.7	34.0
FS Eugene OR MSA	1,229	32,443	24.7	10,668	79.6	48.7	36.8	4.6	19.3	15.8	32.0
LS Albany OR MSA	319	10,829	6.4	3,059	78.7	47.0	34.2	4.2	18.5	17.1	34.5
LS Corvallis OR MSA	341	9,473	6.9	2,193	79.5	58.4	36.8	3.2	14.7	17.3	27.0
LS Salem OR MSA	1,355	26,676	27.2	9,787	78.8	52.7	38.2	3.8	16.2	17.3	31.1
Total	4,978	106,519	100.0	33,438	79.7	52.4	37.7	4.0	15.3	16.3	32.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good. The distribution is good in the Bend-Redmond, OR MSA and Eugene, OR MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 35 percent of its small loans to farms.

Bend-Redmond, OR MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Bend-Redmond, OR MSA is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 60 percent is lower than the 97.7 percent of farms with gross annual revenues of \$1 million or less. However, the bank’s distribution is stronger than the 54.9 percent for aggregate lenders.

Eugene, OR MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Eugene, OR MSA is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 73.7 percent is lower than the 96.5 percent of farms with gross annual revenues of \$1 million or less. However, the bank’s distribution is stronger than the 56.6 percent for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Bend-Redmond OR MSA	30	311	14.5	82	97.7	60.0	54.9	2.0	16.7	0.3	33.3
FS Eugene OR MSA	38	316	17.0	113	96.5	73.7	56.6	2.5	6.7	0.9	26.7
LS Albany OR MSA	31	1,280	12.5	110	96.2	67.7	45.5	3.1	15.8	0.7	33.3
LS Corvallis OR MSA	18	119	9.6	34	95.8	54.5	32.4	3.6	12.5	0.5	73.3
LS Salem OR MSA	135	3,601	53.6	398	92.5	42.2	45.2	6.0	20.0	1.5	37.8
Total	252	5,627	100.0	737	95.1	51.6	47.5	3.9	13.9	1.0	34.5

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending, primarily resulting from strong performance in limited-scope assessment areas, has a positive effect overall on the bank’s Lending Test performance in the state of Oregon.

Bend-Redmond, OR MSA

In the Bend-Redmond, OR MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank refinanced two CD loans totaling \$280,166. Both loans were responsive to the identified needs in the MSA by funding seven units of affordable housing in the MSA. CD lending represents 0.9 percent of the allocated Tier 1 Capital.

Eugene, OR MSA

In the Eugene, OR MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank refinanced four CD loans totaling \$584,000. All loans were responsive to the identified needs in the MSA by funding the development of 26 units of affordable housing in the MSA. CD lending represents 1.4 percent of the allocated Tier 1 Capital.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Oregon, lending under the MHA and HARP programs accounted for 90 percent of the dollar volume of all loans under flexible lending programs

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance varied across the limited-scope assessment areas. Performance in the Albany, OR MSA and Salem, OR MSA is consistent with the Outstanding Lending Test performance. Performance in the Corvallis, OR MSA is good and weaker than the overall Outstanding Lending Test performance due to weaker geographic distributions and relatively lower levels of CD lending.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Oregon is rated Outstanding. Investment performance is good in the Bend-Redmond OR MSA and excellent in the Eugene, OR MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Bend-Redmond, OR MSA

Investment performance in the Bend-Redmond, OR MSA is good. During the current evaluation period, the bank made 20 CD investments in the assessment area totaling \$2.9 million. All of the bank's current period investments supported 18 units of affordable housing. In addition, the bank has nine CD investments totaling \$268,000 it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$3.2 million or 9.9 percent of allocated Tier 1 Capital. None of the current period investments are innovative or complex with mortgage-backed securities representing \$2.9 million or 100 percent of the investment dollars.

Eugene, OR MSA

Investment performance in the Eugene, OR MSA is excellent. During the current evaluation period, the bank made 37 CD investments in the assessment area totaling \$4.1 million. Approximately \$4 million or 98 percent of the current period investment dollars supported 27 units of affordable housing. In addition, the bank has five CD investments totaling \$169,000 it

made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$4.3 million or 10.3 percent of allocated Tier 1 Capital. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$4 million or 98 percent of the investment dollars.

QUALIFIED INVESTMENTS		Geography: OREGON				Evaluation Period: January 1, 2012 to December 31, 2016				
		Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Bend, OR	9	268	20	2,937	29	3,205	11.55	0	0	
Eugene, OR	5	169	37	4,127	42	4,295	15.48	0	0	
Limited Review										
Albany, OR	0	0	9	619	9	619	2.23	0	0	
Corvallis, OR	2	107	13	1,804	15	1,911	6.89	0	0	
Salem, OR	7	364	31	2,923	38	3,287	11.84	0	0	
OREGON - Statewide	0	0	23	205	23	205	0.74	0	0	
OREGON - Non Assessed	42	2,583	74	11,651	116	14,234	51.28	0	0	
OREGON	65	3,491	207	24,266	272	27,756	100.00	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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the limited-scope assessment areas is consistent with the Outstanding Lending Test performance in the state of Oregon.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Oregon is rated Outstanding. Service Test performance is excellent in the Bend-Redmond, OR MSA and Eugene, OR MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Bend-Redmond, OR MSA

In the Bend-Redmond, OR MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's three financial centers with the distribution of the population. The Bend-Redmond, OR MSA has no low-income census tracts. The bank has 2

financial centers or 66.7 percent of its financial centers in moderate-income geographies. Considering 15.7 percent of the population lives in moderate-income geographies, the distribution is excellent.

Examiners also considered the bank’s alternative delivery systems, including ATMs, telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to individuals in moderate-income geographies.

During the evaluation period, the bank did not open or close any financial centers in the MSA.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Financial centers are open 9:30 am to 5:30 pm Monday through Thursday, 9:30 am to 6:00 pm on Friday, and 10:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Bend-Redmond OR MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	4	16.7	24,763	15.7	2	66.7	0	0.0	0	0.0	0	0.0
Middle	15	62.5	101,446	64.3	1	33.3	2	50.0	0	0.0	0	0.0
Upper	5	20.8	31,524	20.0	0	0.0	2	50.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	24	100.0	157,733	100.0	3	100.0	4	100.0	0	100.0	0	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Eugene, OR MSA

In the Eugene, OR MSA, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s three financial centers with the distribution of the population. The bank has no financial centers in low-income MSA geographies where 2.9 percent of the population resides. The bank has 1 financial center or 33.3 percent of its financial centers in moderate-income geographies where 21.4 percent of the population lives. Considering the bank only has three financial centers and those financial centers are located in geographies where most of the population resides, the distribution is excellent.

Examiners also considered the bank’s alternative delivery systems, including ATMs, telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a positive effect on the accessibility of the bank’s service delivery systems to individuals in low- and moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and

moderate-income individuals. During the evaluation period, the bank closed one financial center in a middle-income geography.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Operating hours vary across the three financial centers. Operating hours for the financial center located in the moderate-income geography are more restrictive than the other financial centers by opening 30 minutes later and closing 30 minutes earlier.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Eugene OR MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	2	2.3	10,193	2.9	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	19	22.1	75,277	21.4	1	33.3	3	37.5	0	0.0	0	0.0
Middle	46	53.5	188,826	53.7	2	66.7	5	62.5	0	0.0	1	100.0
Upper	19	22.1	77,419	22.0	0	0.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	86	100.0	351,715	100.0	3	100.0	8	100.0	0	100.0	1	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Bend-Redmond, OR MSA

The bank provides a limited level of community development services in the Bend-Redmond, OR MSA, considering its capacity and opportunities available for participation. Bank employees worked with one local community development organization to provide 11 community development services targeted to low- and moderate-income individuals. Employee involvement was limited to providing financial literacy training. Sixty-eight low- and moderate-income individuals participated in the trainings over the course of the evaluation period. While the community development services addressed one of the needs identified in the assessment area, the community development services did not address many other needs despite available opportunities.

Eugene, OR MSA

The bank provides a relatively high level of community development services in the Eugene, OR MSA, considering its capacity and opportunities available for participation. Bank employees worked with four local community development organizations and five elementary schools to provide 36 community development services targeted to low- and moderate-income individuals. The bank hired third-party contractors to provide fund raising training to local community development organizations. Employee involvement was limited to providing financial literacy training to 774 elementary school students. While the community development services provided were responsive to the needs identified in the assessment area, the activities served a limited demographic.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Corvallis, OR MSA and Salem, OR MSA is consistent with the bank's overall Outstanding Service Test performance in the state of Oregon. Performance in the Albany, OR MSA is adequate and weaker due to the limited retail banking accessibility in moderate-income geographies.

State of Pennsylvania

CRA Rating for Pennsylvania⁴¹: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Good volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and adequate distribution of loans by borrower income or business revenue size;
- Relatively high level of CD lending that has a positive effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Reasonably accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Pennsylvania

Bank of America does not have financial centers in the state of Pennsylvania that are not included in the Allentown-Bethlehem-Easton, PA-NJ Multistate MSA or Philadelphia-Camden-Wilmington, PA-NJ-DE Multistate MSA. These multistate MSAs are separate rating areas; therefore, examiners excluded them from the evaluation of the state of Pennsylvania. As of June 30, 2016, the bank held no deposits in the state. The primary depository financial institutions in Pennsylvania with deposit shares greater than 5 percent include PNC Bank (30.4 percent), First National Bank of Pennsylvania (5.7 percent), and Citizens Bank of Pennsylvania (5.7 percent). As of December 31, 2016, the bank operated two full-service ATMs in Pennsylvania.

Refer to the community profiles for the state of Pennsylvania in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

⁴¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Scope of Evaluation in Pennsylvania

The bank has defined two assessment areas. Examiners selected the Pittsburgh, PA MSA for a full-scope review and the Scranton-Wilkes-Barre-Hazleton, PA MSA for a limited-scope review. Because the bank has no depository presence in either assessment area, examiners based the overall conclusion on an equal weighting of performance in each assessment area. During the evaluation period, Bank of America originated or purchased 7,099 home mortgage loans totaling \$1.1 billion, 8,596 small loans to businesses totaling \$165 million, 96 small loans to farms totaling \$704,000, and 5 CD loans totaling \$5.4 million. Lending volumes include loans originated or purchased in the Lancaster, PA MSA, Reading, PA MSA, and Pennsylvania Non-MSA (Schuylkill County), which the bank no longer designates as assessment areas due to the bank's closure or sale of all financial centers and deposit-taking ATMs in those communities. Based on loan volume, examiner weighted small loans to businesses, representing 54 percent of the volume, the heaviest, followed by home mortgage loans at 45 percent, and small loans to farms at less than 1 percent.

Examiners conducted telephone interviews with two local community services agencies representing neighborhood housing. The community contacts noted that affordable housing for first-time homebuyers along with older housing stock, particularly in rural areas, are concerns within the region.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Pennsylvania is rated High Satisfactory, based on good lending activity, good geographic distribution, adequate borrower income distribution, and a relatively high level of CD lending that has a positive effect on the Lending Test. Performance in the limited-scope assessment area has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Pennsylvania is good. Lending activity is good in the Pittsburgh, PA MSA.

Pittsburgh, PA MSA

Lending activity in the Pittsburgh, PA MSA is good. Bank of America has no deposits in the assessment area. According to peer mortgage data for 2016, the bank has a market share of 0.6 percent based on the number of home mortgage loan originated or purchased. The bank ranks 34th among 536 home mortgage lenders, which places it in the top 7 percent of lenders competing for loans. According to peer small business data for 2016, the bank has a 2.2

percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks ninth among 128 small business lenders, which places it in the top 8 percent of lenders in the MSA. For small loans to farms, the bank has a market share of 7.5 percent based on the number of small loans to farms originated or purchased. The bank ranks fourth among 22 farm lenders, which places it in the top 19 percent of lenders. Considering the bank has no retail banking presence or deposits in the assessment area and its relative ranking among all lenders for home mortgage loans and small loans to businesses, overall lending activity is good.

Table 1. Total Lending Volume											2012-2016	
LENDING VOLUME			Geography: PENNSYLVANIA					Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Lancaster, PA	8.24	671	107,743	608	12,033	21	187	1	400	1,301	120,363	0.00
Pittsburgh, PA	62.67	4,198	651,909	5,649	113,650	50	376	3	4,611	9,900	770,546	0.00
Limited Review												
Reading, PA	7.55	705	107,041	476	7,957	11	55	1	400	1,193	115,453	0.00
Scranton, PA	19.59	1,370	191,316	1,713	29,897	11	66	0	0	3,094	221,279	0.00
Pennsylvania Non-MSA	1.95	155	16,871	150	1,693	3	20	0	0	308	18,584	0.00
PENNSYLVANIA	100.00	7,099	1,074,880	8,596	165,230	96	704	5	5,411	15,796	1,246,225	100.00
(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.												
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.												
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.												

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is adequate in the Pittsburgh, PA MSA. Good performance in the limited-scope assessment area has a positive effect on the overall conclusion.

Pittsburgh, PA MSA

The geographic distribution of home mortgage loans in the Pittsburgh, PA MSA is adequate. Performance is adequate in low-income geographies and poor in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 1.1 percent is lower than the 2.1 percent of owner-occupied housing units in low-income geographies, but is consistent with the 1.1 percent for aggregate lenders. Although the percentage of owner-occupied housing units is low at 2.1 percent, it represents approximately

15,000 housing units. The distribution in moderate-income geographies at 11.3 percent is lower than the 19.2 percent of owner-occupied housing units of approximately 135,000 housing units in moderate-income geographies and lower than the 13.3 percent for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Pittsburgh PA MSA	1,616	286,372	78.0	66,207	2.1	1.1	1.1	19.2	11.3	13.3	50.8	48.0	47.9	27.8	39.7	37.7	0.0	0.0	0.0
LS Scranton-Wilkes-Barre-Hazleton PA MSA	456	78,793	22.0	11,331	0.7	0.4	0.7	14.4	14.5	10.5	61.7	58.8	61.1	23.2	26.3	27.7	0.0	0.0	0.0
Total	2,072	365,165	100.0	77,538	1.9	0.9	1.1	18.3	12.0	12.9	52.8	50.3	49.8	27.0	36.8	36.2	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The distribution is good in the Pittsburgh, PA MSA.

Pittsburgh, PA MSA

The geographic distribution of small loans to businesses in the Pittsburgh, PA MSA is good. Performance is good in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 3.1 percent is lower than the 4.1 percent of businesses in low-income geographies and it is slightly lower than the 3.4 percent performance for aggregate lenders. The distribution in moderate-income geographies at 14.4 percent is lower than the 16.7 percent of businesses in moderate-income geographies and it is lower than the 15.6 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Pittsburgh PA MSA	3,205	66,057	78.3	45,350	4.1	3.1	3.4	16.7	14.4	15.6	47.2	47.5	46.1	31.4	34.7	34.6	0.6	0.4	0.3
LS Scranton-Wilkes-Barre-Hazleton PA MSA	888	14,555	21.7	9,258	5.5	3.7	4.3	15.0	14.0	12.7	58.4	61.8	59.5	21.0	20.5	23.4	0.1	0.0	0.1
Total	4,093	80,612	100.0	54,608	4.3	3.2	3.5	16.4	14.3	15.1	49.2	50.6	48.4	29.6	31.6	32.7	0.5	0.3	0.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is good. The distribution is good in the Pittsburgh, PA MSA.

Pittsburgh, PA MSA

The geographic distribution of small loans to farms in the Pittsburgh, PA MSA is good, based on excellent performance in low-income geographies and adequate performance in moderate-income geographies. The geographic distribution of small loans to farms in low-income geographies at 9.1 percent is significantly higher than the 1.2 percent of farms in low-income geographies and it is significantly higher than the 0 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 12.1 percent is lower than the 14.1 percent of farms in moderate-income geographies and it is lower than the 29.5 percent for aggregate lenders. During the 2012-2013 period, the bank performed more consistently with aggregate lenders. Although not shown in the table below, the bank’s distribution at 17.6 percent exceeded the 14.9 percent of farms in moderate-income geographies and its performance was slightly below the 18.3 percent for aggregate lenders.

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS Pittsburgh PA MSA	33	246	84.6	146	1.2	9.1	0.0	14.1	12.1	29.5	59.9	81.8	58.2	24.7	9.1	12.3	0.1	0.0	0.0
LS Scranton-Wilkes-Barre-Hazleton PA MSA	6	37	21.4	36	0.9	0.0	0.0	7.8	0.0	2.8	63.3	83.3	75.0	28.0	33.3	22.2	0.0	0.0	0.0
Total	39	283	100.0	182	1.2	7.7	0.0	13.1	10.3	24.2	60.5	82.1	61.5	25.2	7.4	14.3	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is adequate. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Pittsburgh, PA MSA.

Pittsburgh, PA MSA

The distribution of home mortgage loans by borrower income in the Pittsburgh, PA MSA is good. The distribution is good to low-income borrowers and good to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 11.6 percent is lower than the 20.4 percent of low-income families in the MSA; however, the bank’s performance exceeds the 8 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 17.0 percent is lower than the 18.1 percent of moderate-income families and it is lower than the 18.1 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Pittsburgh PA MSA	1,616	286,372	78.0	66,207	20.4	11.6	8.0	18.1	17.0	18.1	21.9	20.4	20.9	39.6	40.7	40.1	0.0	10.3	12.9
LS Scranton-Wilkes-Barre-Hazleton PA MSA	456	78,793	22.0	11,331	20.3	13.4	8.1	18.0	15.8	17.7	21.7	23.2	21.6	40.0	33.1	36.3	0.0	14.5	16.2
Total	2,072	365,165	100.0	77,538	20.4	12.0	8.0	18.1	16.7	18.0	21.8	21.0	21.0	39.7	39.0	39.6	0.0	11.2	13.4

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is adequate overall. The distribution is adequate in the Pittsburgh, PA MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 38 percent of its small loans to businesses.

Pittsburgh, PA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Pittsburgh, PA MSA is adequate. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 45.7 percent is lower than the 76.5

percent of businesses with gross annual revenues of \$1 million or less and it is slightly lower than the 46.7 percent for aggregate lenders.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Pittsburgh PA MSA	3,205	66,057	78.3	45,350	76.5	45.7	46.7	5.6	16.7	17.9	37.6
LS Scranton-Wilkes-Barre-Hazleton PA MSA	888	14,555	21.7	9,258	76.3	45.3	45.8	5.1	16.3	18.6	38.4
Total	4,093	80,612	100.0	54,608	76.5	45.6	46.6	5.5	16.6	18.0	37.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The distribution is adequate in the Pittsburgh, PA MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 46 percent of its small loans to farms.

Pittsburgh, PA MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Pittsburgh, PA MSA is adequate. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 51.5 percent is lower than the 96.9 percent of farms with gross annual revenues of \$1 million or less. The bank’s distribution is also lower than the 54.8 percent for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Pittsburgh PA MSA	33	246	84.6	146	96.9	51.5	54.8	1.9	9.1	1.2	45.5
LS Scranton-Wilkes-Barre-Hazleton PA MSA	6	37	18.5	36	97.3	60.0	58.3	2.0	0.0	0.7	75.0
Total	39	283	100.0	182	97.0	51.3	55.5	1.9	7.1	1.1	46.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

Considering the bank’s very limited retail banking presence and resources in the assessment area, CD lending has a positive effect overall on the bank’s Lending Test performance in the state of Pennsylvania.

Pittsburgh, PA MSA

In the Pittsburgh, PA MSA, CD lending has a significantly positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated three CD loans totaling \$4.6 million that primarily helped provide 39 units of affordable housing.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Pennsylvania, lending under the MHA and HARP programs accounted for 89 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Scranton-Wilkes-Barre-Hazleton, PA MSA is weaker than the overall High Satisfactory Lending Test performance in the state of Pennsylvania. Performance is weaker due to absence of any CD lending that may have otherwise positively affected the lending performance.

INVESTMENT TEST**Conclusions for Areas Receiving Full-Scope Reviews**

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Pennsylvania is rated Outstanding. Investment performance is excellent in the Pittsburgh, PA MSA. Performance in the limited-scope assessment area has a neutral effect on the state rating.

Pittsburgh, PA MSA

In the Pittsburgh, PA MSA, Bank of America has an excellent level of CD investments, considering the bank's very limited retail banking presence and resources in the assessment area. The bank made 14 CD investments during the current evaluation period totaling \$1.1 million. All of the current period investment dollars supported community development organizations providing services targeted to low- and moderate-income individuals and families. In addition, the bank has seven CD investments totaling \$1.2 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$2.2 million. The majority of current period investments are neither innovative nor complex with investments in CDFIs representing approximately \$1 million or 95 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$689,000 in the Enterprise Community Loan Fund (ECLF), a CDFI and Community Development Entity (CDE). The ECLF provides community developers with access to interim financing otherwise unavailable for affordable housing development and community facility projects, such as charter schools and health facilities.
- The bank invested \$250,000 in the National Federation of Community Development Credit Unions (the Federation). The Federation is a certified CDFI with a mission to help low- and moderate-income people and communities achieve financial independence through Community Development Credit Unions.

QUALIFIED INVESTMENTS		Geography: PENNSYLVANIA				Evaluation Period: January 1, 2012 to December 31, 2016			
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Pittsburgh, PA	7	1,179	14	1,057	21	2,235	21.48	0	0
Limited Review									
Scranton, PA	13	581	12	1,476	25	2,058	19.77	0	0
PENNSYLVANIA - Statewide	0	0	14	74	14	74	0.71	0	0
PENNSYLVANIA - Non Assessed	9	474	42	5,566	51	6,040	58.04	0	0
PENNSYLVANIA	29	2,234	82	8,172	111	10,406	100.00	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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Scranton-Wilkes-Barre-Hazleton, PA MSA is consistent with the Outstanding Investment Test performance in the state of Pennsylvania.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Pennsylvania is rated Low Satisfactory. Service Test performance is adequate in the Pittsburgh, PA MSA. Performance in the limited-scope assessment area has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Pittsburgh, PA MSA

In the Pittsburgh, PA MSA, the bank’s delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank’s retail presence in the assessment area is limited to two full-service ATMs. Considering the very limited presence, accessibility to the ATMs along with additional accessibility provided through other alternative delivery systems, overall accessibility is reasonable.

The bank’s alternative delivery systems including the full-service ATM, telephone, online, mobile, and text banking have a positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customer’s residency. For ATM usage and text banking, the percentage of customers in low- and moderate-income geographies using the platform exceeded the overall percentage of the population in low- and moderate-income geographies.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Pittsburgh PA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	46	6.5	95,673	4.1	0	0.0	1	50.0	0	0.0	0	0.0
Moderate	183	25.7	504,199	21.4	0	0.0	0	0.0	0	0.0	0	0.0
Middle	323	45.4	1,125,015	47.7	0	0.0	1	50.0	0	0.0	0	0.0
Upper	145	20.4	621,805	26.4	0	0.0	0	0.0	0	0.0	0	0.0
NA	14	2.0	9,593	0.4	0	0.0	0	0.0	0	0.0	0	0.0
Totals	711	100.0	2,356,285	100.0	0	100.0	2	100.0	0	100.0	0	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Pittsburgh, PA MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 28 community development services targeted to low- and moderate-income individuals. Employees provided three financial education workshops for 58 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in eight webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, four employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Scranton-Wilkes-Barre-Hazleton, PA MSA is consistent with the Low Satisfactory Service Test performance in the state of Pennsylvania.

State of South Carolina

CRA Rating for South Carolina⁴²: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Adequate distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in South Carolina

The state of South Carolina is Bank of America's 20th largest rating area based on its total deposits in the state when excluding deposits in the Augusta-Richmond County, GA-SC Multistate MSA, Charlotte-Concord-Gastonia, NC-SC Multistate MSA, and Myrtle Beach-Conway-North Myrtle Beach, SC-NC Multistate MSA. Examiners excluded the multistate MSAs from the analysis of the state of South Carolina because examiners evaluated the multistate MSAs as separate rating areas. As of June 30, 2016, the bank maintained approximately \$10.6 billion or 0.9 percent of its total domestic deposits in financial centers in areas of the state of South Carolina that do not include the multistate MSAs. Of the 80 depository financial institutions operating in the areas of the state that do not include the multistate MSAs, Bank of America, with a deposit market share of 15.6 percent, is the second largest. Competitors with deposit market shares greater than 5 percent include Wells Fargo Bank (21.3 percent), Branch Banking and Trust Company (9.8 percent), First Citizens Bank & Trust Company (8.1 percent), and South State Bank (7.1 percent). As of December 31, 2016, the bank operated 65 financial centers and 186 ATMs in the areas of the state of South Carolina that exclude the multistate MSAs.

Examiners used the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In

⁴² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

the Columbia, SC MSA, Bank of America reported an additional \$182 million in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

Refer to the community profiles for the state of South Carolina in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in South Carolina

The bank has defined eight assessment areas. For purposes of this evaluation, examiners combined the three non-MSA assessment areas. Examiners selected the Charleston-North Charleston, SC MSA and Columbia, SC MSA for full-scope reviews and the Greenville-Anderson-Mauldin, SC MSA, Hilton Head Island-Bluffton-Beaufort, SC MSA, Spartanburg, SC MSA, and South Carolina Non-MSA for limited-scope reviews. While the Columbia, SC MSA carries approximately 50 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in South Carolina, the conclusions and ratings for the state are based on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 22,042 home mortgage loans totaling nearly \$4.3 billion, 21,922 small loans to businesses totaling \$612.7 million, 207 small loans to farms totaling \$2.6 million, and 18 CD loans totaling \$81.8 million. Lending volumes include loans originated or purchased in the Anderson, SC MSA prior to the Office of Management and Budget (OMB) including the MSA in the Greenville-Anderson-Mauldin, SC MSA during 2014. The volumes include lending activity in the Florence, SC MSA and Sumter, SC MSA, which the bank no longer designates as assessment areas due to the bank's closure or sale of all financial centers and deposit-taking ATMs. The loan volumes also include loans originated or purchased in the Myrtle Beach-North Myrtle Beach-Conway, SC MSA prior to the assessment area's designation as a multistate MSA. Based on loan volume, examiners weighted small loans to businesses, representing 49.6 percent of the volume, equally with home mortgage loans at 49.9 percent, followed by small loans to farms at less than 1 percent.

Examiners conducted telephone interviews with two local community services agencies representing neighborhood housing, economic development, and community development financial institutions. The community contacts noted high transportation costs commuting to available jobs, start-up funding, affordable health care, childhood education success, lack of resources to afford food, industry expansion, and affordable housing continue to be concerns across the state. The agencies request that financial institutions assist by providing small business lending, community development investments in small business development centers, and other community development services to groups. A review of the bank's investments noted the bank is active in the state in providing affordable housing assistance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of South Carolina is rated High Satisfactory, based on excellent lending activity, adequate geographic distribution, and good borrower income distribution. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of South Carolina is excellent. Lending activity is excellent in the Charleston-North Charleston, SC MSA and excellent in the Columbia, SC MSA.

Charleston-North Charleston, SC MSA

Lending activity in the Charleston-North Charleston, SC MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 14.8 percent. The bank ranks second among 30 depository financial institutions in the assessment area, which places it in the top 7 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.6 percent based on the number of home mortgage loans originated or purchased. The bank ranks seventh among 520 home mortgage lenders, which places it in the top 2 percent of lenders competing for loans. According to peer small business data for 2016, the bank has a 9 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks third among 114 small business lenders, which places it in the top 3 percent of lenders in the MSA. For small loans to farms, the bank has a market share of 9.1 percent based on the number of small loans to farms originated or purchased. The bank ranks sixth among 13 farm lenders, which places it in the top 47 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

Columbia, SC MSA

Lending activity in the Columbia, SC MSA is excellent. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 28.9 percent. The bank ranks second among 26 depository financial institutions in the assessment area, which places it in the top 8 percent of 26 institutions. Excluding the \$182 million in corporate deposits derived from outside the assessment area, the bank's deposit market share would only marginally decline to 28.2 percent. According to peer mortgage data for 2016, the bank has a market share of 2.2 percent based on the number of home mortgage loans originated or purchased. The bank ranks 10th among 413 home mortgage lenders, which places it in the top 2 percent of lenders.

According to peer small business data for 2016, the bank has a 7.4 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fifth among 94 small business lenders, which places it in the top 6 percent of lenders. For small loans to farms, the bank has a market share of 4.8 percent based on the number of small loans to farms originated or purchased. The bank ranks seventh among 16 farm lenders, which places it in the top 44 percent of lenders. Considering the bank’s higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: SOUTH CAROLINA						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Charleston, SC	27.54	6,110	1,552,638	6,027	194,915	31	356	1	1,125	12,169	1,749,034	17.07
Columbia, SC	22.32	5,050	757,170	4,747	117,106	58	650	8	30,988	9,863	905,914	49.96
Limited Review												
Anderson, SC	1.84	467	57,857	337	8,532	8	41	0	0	812	66,430	0.00
Florence, SC	1.25	321	42,800	224	17,683	6	36	0	0	551	60,519	1.92
Greenville, SC	18.86	3,566	590,180	4,724	104,822	41	414	1	6,000	8,332	701,416	20.57
Hilton Head Island, SC	1.29	568	568	568	568	568	568	568	568	568	568	5.28
Myrtle Beach, SC	5.64	1,816	305,562	674	19,391	3	33	0	0	2,493	324,986	0.00
Spartanburg, SC	7.00	1,242	160,135	1,839	59,191	12	77	2	19,056	3,095	238,459	4.41
Sumter, SC	0.73	183	24,472	126	3,946	12	695	1	3,172	322	32,285	0.00
South Carolina Non-MSA	11.15	2,719	579,152	2,170	62,406	33	301	4	16,777	4,926	658,636	2.71
SOUTH CAROLINA	100.00	22,042	4,266,733	21,922	612,676	207	2,628	18	81,833	44,189	4,963,870	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects adequate penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is adequate. The distribution is adequate in the Charleston-North Charleston, SC MSA and adequate in the Columbia, SC MSA.

Charleston-North Charleston, SC MSA

The geographic distribution of home mortgage loans in the Charleston-North Charleston, SC MSA is adequate. Performance is good in low-income geographies and poor in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at

1.1 percent is slightly lower than the 1.7 percent of owner-occupied housing units and it is equal to the 1.1 percent for aggregate lenders. The distribution in moderate-income geographies at 10.9 percent is lower than the 18.3 percent of owner-occupied housing units and lower than the 14.7 percent for aggregate lenders.

Columbia, SC MSA

The geographic distribution of home mortgage loans in the Columbia, SC MSA is adequate. Performance is good in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 0.8 percent is lower than the 1 percent of owner-occupied housing unit, but it is higher than the 0.5 percent performance for aggregate lenders. The distribution in moderate-income geographies at 12.9 percent is lower than the 26.1 percent of owner-occupied housing units, but it exceeds the 12.1 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Charleston-North Charleston SC MSA	2,252	658,276	30.2	34,935	1.7	1.1	1.1	18.3	10.3	14.7	48.7	39.7	46.5	31.3	48.9	37.7	0.0	0.0	0.0
FS Columbia SC MSA	1,818	261,339	24.4	26,500	1.0	0.7	0.5	26.1	13.0	12.1	38.7	35.5	36.7	34.2	50.8	50.7	0.0	0.0	0.0
LS Greenville-Anderson-Mauldin SC MSA	1,781	311,945	23.9	28,583	2.7	1.2	1.4	17.7	10.6	11.4	50.8	45.1	45.4	28.8	43.0	41.8	0.0	0.0	0.0
LS Hilton Head Island-Bluffton-Beaufort SC MSA	568	196,767	7.6	8,921	0.7	0.5	0.3	24.9	13.6	17.3	36.5	33.3	41.3	37.9	52.6	41.1	0.0	0.0	0.0
LS South Carolina Non-MSA	480	91,560	6.4	5,648	0.4	0.2	0.1	13.9	6.7	7.3	45.2	23.8	32.0	40.5	69.2	60.6	0.0	0.2	0.0
LS Spartanburg SC MSA	546	71,006	7.3	9,535	2.3	0.0	0.4	17.6	10.4	10.7	54.1	51.3	55.0	26.0	38.3	33.8	0.0	0.0	0.0
Total	7,445	1,590,893	100.0	114,122	1.7	0.8	0.9	20.0	11.1	12.8	46.3	39.3	43.5	32.1	48.8	42.8	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is good. The distribution is adequate in the Charleston-North Charleston, SC MSA and good in the Columbia, SC MSA.

Charleston-North Charleston, SC MSA

The geographic distribution of small loans to businesses in the Charleston-North Charleston, SC MSA is adequate. Performance is poor in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 2.9 percent is lower than

the 4.5 percent of businesses in low-income geographies and it is lower than the 4.4 percent performance for aggregate lenders. The distribution in moderate-income geographies at 17.1 percent is lower than the 22.7 percent of businesses in moderate-income geographies and it is lower than the 18.2 percent performance for aggregate lenders.

Columbia, SC MSA

The geographic distribution of small loans to businesses in the Columbia, SC MSA is good. The distribution is good in low-income geographies and adequate in moderate-income geographies. The geographic distribution in low-income geographies at 1.6 percent is below the 2.6 percent of businesses in low-income geographies and it is slightly higher than the 1.5 percent performance for aggregate lenders. The geographic distribution in moderate-income geographies at 17.7 percent is lower than the 24 percent of businesses in moderate-income geographies and it is lower than the 21.2 percent performance of aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate
FS Charleston-North Charleston SC MSA	3,855	112,588	29.3	15,803	4.5	2.9	4.4	22.7	17.1	18.2	40.9	37.5	38.2	31.9	42.5	39.2	0.0	0.0	0.0
FS Columbia SC MSA	3,029	70,029	23.0	13,185	2.6	1.6	1.5	24.0	17.7	21.2	39.2	36.4	37.6	33.4	44.0	39.5	0.8	0.2	0.2
LS Greenville-Anderson-Mauldin SC MSA	3,248	68,206	24.7	15,537	4.6	3.6	3.7	20.1	15.9	16.9	40.6	37.7	37.9	34.7	42.7	41.5	0.0	0.0	0.0
LS Hilton Head Island-Bluffton-Beaufort SC MSA	1,053	24,675	8.0	4,778	3.7	4.2	3.6	21.5	15.0	21.1	34.9	31.9	31.7	39.9	48.9	43.6	0.0	0.0	0.0
LS Spartanburg SC MSA	1,221	35,748	9.3	4,925	3.5	2.8	2.1	21.6	17.2	16.7	45.6	45.6	47.1	29.3	34.4	34.1	0.0	0.0	0.0
LS South Carolina Non-MSA	748	16,199	5.7	4,015	2.3	1.5	1.3	15.7	8.7	12.5	38.1	30.5	32.7	44.0	59.4	53.5	0.0	0.0	0.0
Total	13,154	327,445	100.0	58,243	3.7	2.8	3.1	21.5	16.3	18.2	40.2	37.2	37.8	34.3	43.6	40.8	0.2	0.1	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "-" data not available. Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is adequate. The distribution is good in the Charleston-North Charleston, SC MSA and adequate in the Columbia, SC MSA.

Charleston-North Charleston, SC MSA

The geographic distribution of small loans to farms in the Charleston-North Charleston MSA is good, based on adequate performance in low-income geographies and good performance in moderate-income geographies. The geographic distribution of small loans to farms in low-income geographies at 0 percent is lower than the 2.7 percent of farms in low-income geographies, but it is consistent with the 0 percent for aggregate lenders. The low percentage of small farms in low-income geographies coupled with the low lending performance for the bank and aggregate lenders are indicators of the low demand for small loans to farms in low-

income geographies. The geographic distribution in moderate-income geographies at 14.3 percent is lower than the 18.2 percent of farms in moderate-income geographies; however, it exceeds the 9.8 percent for aggregate lenders.

Columbia, SC MSA

The geographic distribution of small loans to farms in the Columbia, SC MSA is adequate, based on adequate performance in low-income geographies and poor performance in moderate-income geographies. The geographic distribution of small loans to farms in low-income geographies at 0 percent is lower than the 0.8 percent of farms in low-income geographies and it is consistent with the 0 percent for aggregate lenders. The low percentage of small farms in low-income geographies coupled with the low lending performance for the bank and aggregate lenders are indicators of the low demand for small loans to farms in low-income geographies. The geographic distribution in moderate-income geographies at 29.7 percent is lower than the 34.5 percent of farms in moderate-income geographies and lower than the 58.3 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Charleston-North Charleston SC MSA	17	202	17.5	51	2.7	0.0	0.0	18.2	14.3	9.8	51.8	70.6	62.7	27.2	40.0	27.5	0.0	0.0	0.0
FS Columbia SC MSA	37	469	33.9	144	0.8	0.0	0.0	34.5	29.7	58.3	37.3	35.1	31.9	27.4	35.1	9.7	0.0	0.0	0.0
LS Greenville-Anderson-Mauldin SC MSA	32	371	29.4	79	1.8	0.0	0.0	17.2	8.3	20.3	55.2	75.0	63.3	25.7	18.8	16.5	0.0	0.0	0.0
LS Hilton Head Island-Bluffton-Beaufort SC MSA	3	25	2.8	19	4.8	0.0	0.0	32.7	100.0	68.4	31.8	0.0	15.8	30.8	0.0	15.8	0.0	0.0	0.0
LS Spartanburg SC MSA	7	40	7.1	19	1.4	0.0	5.3	14.6	0.0	21.1	60.2	85.7	52.6	23.8	33.3	21.1	0.0	0.0	0.0
LS South Carolina Non-MSA	13	156	11.9	143	0.2	20.0	0.0	10.0	25.0	7.0	58.3	69.2	69.9	31.5	22.2	23.1	0.0	0.0	0.0
Total	109	1,263	100.0	455	1.7	2.4	0.2	21.6	16.5	29.0	49.3	58.7	53.0	27.3	23.9	17.8	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Charleston-North Charleston, SC MSA and excellent in the Columbia, SC MSA.

Charleston-North Charleston, SC MSA

The distribution of home mortgage loans by borrower income in the Charleston-North Charleston, SC MSA is good. The distribution is adequate to low-income borrowers and it is good to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 6.8 percent is lower than the 21.7 percent of low-income families in the MSA; however, the bank's performance is higher than the 4.8 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 14.6 percent is lower than the 17.1 percent of moderate-income families and it is lower than the 15.7 percent performance for aggregate lenders.

Columbia, SC MSA

The distribution of home mortgage loans by borrower income in the Columbia, SC MSA is excellent. The distribution is good to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 11.4 percent is lower than the 21.8 percent of low-income families in the MSA; however, it is significantly higher than the 6.2 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 19.2 percent exceeds the 17.5 percent of moderate-income families in the MSA and it exceeds the 16.9 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Charleston-North Charleston SC MSA	2,252	658,276	30.2	34,935	21.7	6.9	4.8	17.1	13.4	15.7	20.4	17.9	20.2	40.8	52.3	41.2	0.0	9.5	18.1
FS Columbia SC MSA	1,818	261,339	24.4	26,500	21.8	11.1	6.2	17.5	17.9	16.9	20.4	21.0	18.6	40.4	39.9	33.8	0.0	10.2	24.4
LS Greenville-Anderson-Mauldin SC MSA	1,781	311,945	23.9	28,583	22.0	10.2	5.7	16.9	15.4	15.8	19.9	19.4	20.8	41.2	48.1	40.9	0.0	7.0	16.9
LS Hilton Head Island-Bluffton-Beaufort SC MSA	568	196,767	7.6	8,921	20.0	6.9	2.9	18.0	9.7	11.5	20.5	15.8	18.7	41.5	58.5	53.8	0.0	9.2	13.1
LS South Carolina Non-MSA	480	91,560	6.4	5,648	20.2	5.4	2.7	16.0	8.5	9.2	17.4	16.7	17.4	46.4	57.9	55.0	0.0	11.5	15.7
LS Spartanburg SC MSA	546	71,006	7.3	9,535	21.6	11.9	4.4	17.6	15.8	17.4	20.4	24.2	22.7	40.4	39.0	36.5	0.0	9.2	18.9
Total	7,445	1,590,893	100.0	114,122	21.5	9.0	5.1	17.2	14.5	15.5	20.0	19.2	19.9	41.3	48.1	40.7	0.0	9.1	18.8

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Charleston-North Charleston, SC MSA and good in the Columbia, SC MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 34 percent of its small loans to businesses.

Charleston-North Charleston, SC MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Charleston-North Charleston, SC MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 54.9 percent is lower than the 76 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 47.9 percent for aggregate lenders, overall performance is good.

Columbia, SC MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Columbia, SC MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 56.8 percent is lower than the 75.2 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 52.2 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Charleston-North Charleston SC MSA	3,855	112,588	29.3	15,803	76.0	54.9	47.9	5.0	12.2	19.0	32.9
FS Columbia SC MSA	3,029	70,029	23.0	13,185	75.2	56.8	52.2	5.1	10.4	19.6	32.8
LS Greenville-Anderson-Mauldin SC MSA	3,248	68,206	24.7	15,537	75.3	55.4	47.8	5.4	10.4	19.3	34.2
LS Hilton Head Island-Bluffton-Beaufort SC MSA	1,053	24,675	8.0	4,778	78.6	53.9	46.4	4.8	10.6	16.7	35.4
LS Spartanburg SC MSA	1,221	35,748	9.3	4,925	74.1	56.6	45.5	5.7	12.2	20.2	31.2
LS South Carolina Non-MSA	748	16,199	5.7	4,015	76.6	53.1	48.0	4.3	9.5	19.1	37.4
Total	13,154	327,445	100.0	58,243	75.7	55.4	48.5	5.1	11.1	19.2	33.5

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good. The distribution is good in the Charleston-North Charleston, SC MSA and good in the Columbia, SC MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 41 percent of its small loans to farms.

Charleston-North Charleston, SC MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Charleston-North Charleston, SC MSA is good. Based on farms with known revenues, the proportion of the bank's small loans to farms at 58.5 percent is lower than the 94.5 percent of farms with gross annual revenues of \$1 million or less. Considering the bank's distribution is stronger than the 45.1 percent for aggregate lenders, overall performance is good.

Columbia, SC MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Columbia, SC MSA is good. Based on farms with known revenues, the proportion of the bank's small loans to farms at 45.9 percent is lower than the 96.7 percent of farms with gross annual revenues of \$1 million or less. Considering the bank's distribution is stronger than the 41 percent for aggregate lenders, overall performance is good.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Charleston-North Charleston SC MSA	17	202	17.5	51	94.5	58.8	45.1	3.6	14.3	1.8	35.3
FS Columbia SC MSA	37	469	36.6	144	96.7	45.9	41.0	2.6	10.0	0.7	45.9
LS Greenville-Anderson-Mauldin SC MSA	32	371	29.4	79	97.6	56.3	39.2	1.2	0.0	1.2	43.8
LS Hilton Head Island-Bluffton-Beaufort SC MSA	3	25	2.9	19	92.9	100.0	47.4	5.6	0.0	1.5	100.0
LS Spartanburg SC MSA	7	40	6.4	19	97.2	57.1	52.6	1.5	0.0	1.2	42.9
LS South Carolina Non-MSA	13	156	11.9	143	97.0	76.9	45.5	2.3	0.0	0.6	33.3
Total	109	1,263	100.0	455	96.3	55.0	43.3	2.5	4.9	1.2	41.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect overall on the bank’s Lending Test performance in the state of South Carolina. The bank met the credit needs of its communities primarily through retail lending.

Charleston-North Charleston, SC MSA

In the Charleston-North Charleston, SC MSA, CD lending has a neutral effect on lending performance in the assessment area. During the evaluation period, the bank originated one CD loan totaling \$1.1 million that helped to provide 44 units of affordable housing. CD lending represents 0.5 percent of the allocated Tier 1 Capital.

Columbia, SC MSA

In the Columbia, SC MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated eight CD loans totaling \$31 million that primarily helped to provide 308 units of affordable housing. CD lending represents 4.8 percent of the allocated Tier 1 Capital, after considering \$182 million in deposits from national corporations in which the deposits did not derive from the local community.

Examples of CD loans include:

- The bank purchased \$11 million in tax-exempt bonds used to construct a 124-unit affordable housing development.
- The bank provided \$7.5 million in construction financing for Abernathy Place, a 64-unit affordable housing project located in Columbia, SC. Income restrictions include 13 units at 50 percent of the area median income (AMI) and 51 units at 60 percent of AMI. The bank also provided a LIHTC equity investment for this project.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America’s Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also

participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of South Carolina, lending under the MHA and HARP programs accounted for 77 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Greenville-Anderson-Mauldin, SC MSA is consistent with the High Satisfactory Lending Test performance in the state of South Carolina. Performance in the Hilton Head Island-Bluffton-Beaufort, SC MSA, Spartanburg, SC MSA, and South Carolina Non-MSA is stronger than the overall High Satisfactory Lending Test performance in the state. Performance is stronger primarily due to the higher levels of CD lending that have a positive or significantly positive effect on lending performance in those assessment areas.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of South Carolina is rated Outstanding. Investment performance is good in the Charleston-North Charleston, SC MSA and excellent in the Columbia, SC MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Charleston-North Charleston, SC MSA

In the Charleston-North Charleston, SC MSA, Bank of America has a good level of CD investments. The bank made 91 CD investments during the evaluation period totaling \$19.2 million. Approximately \$18.9 million or 98 percent of the current period investment dollars supported 165 units of affordable housing and approximately \$17.9 million of those investments are mortgage-backed securities. In addition, the bank has 20 CD investments totaling \$2.7 million it made during a prior evaluation period that are still outstanding and continuing to provide benefit to the community. Prior period and current period investments total \$21.9 million or 9.7 percent of allocated Tier 1 Capital. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$11.7 million or 93 percent of the investment dollars.

Columbia, SC MSA

In the Columbia, SC MSA, the bank has an excellent level of CD investments. The bank made 132 CD investments during the evaluation period totaling \$62.6 million. Approximately \$61.7 million or 99 percent of the current period investment dollars supported 583 units of affordable housing. In addition, the bank has 40 CD investments totaling \$6.9 million it made during a prior evaluation period that are still outstanding and continuing to provide benefit to the community. Prior period and current period investments total \$69.5 million or 10.8 percent of

allocated Tier 1 Capital, after considering the \$182 million in deposits not originated from the assessment area. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$40.2 million or 64 percent of the investment dollars.

Examples of community development investments include:

- The bank made annual contributions to Midlands Housing Trust Fund (MHTF) totaling \$91,000. MHTF works to create and preserve quality affordable housing for low- and moderate-income households in the Midlands region of South Carolina. Older dilapidated and vacant housing stock characterizes the region. The MHTF operates a revolving loan fund that lends to housing developers for the creation of affordable housing in the region.
- The bank invested nearly \$9.8 million in a Section 42 LIHTC Fund that indirectly invests in qualifying LIHTC properties located throughout the U.S. This investment provides construction financing for Arcadia Park, a 60-unit affordable housing development in Columbia, SC. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$8.2 million in LIHTC funding for the construction of Village at River's Edge, a 124-unit affordable housing development in Columbia, SC. The developer has restricted all units to renters with incomes at or below 60 percent of the area median income and Section 8 project-based Housing Assistance Payment contracts will cover the units.

QUALIFIED INVESTMENTS		Geography: SOUTH CAROLINA				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Charleston, SC	20	2,740	91	19,161	111	21,901	13.37	0	0	
Columbia, SC	40	6,884	132	62,613	172	69,497	42.41	4	10,919	
Limited Review										
Greenville, SC	18	7,279	105	22,293	123	29,573	18.05	0	0	
Hilton Head Island, SC	0	0	23	2,401	23	2,401	1.47	0	0	
Spartanburg, SC	16	2,606	42	10,400	58	13,006	7.94	1	5,287	
South Carolina Non-MSA	3	106	44	4,584	47	4,690	2.86	1	848	
SOUTH CAROLINA - Statedwide	0	0	16	135	16	135	0.08	0	0	
SOUTH CAROLINA - Non Assessed	49	4,397	84	18,255	133	22,652	13.82	2	1,563	
SOUTH CAROLINA	146	24,012	537	139,842	683	163,854	100.00	8	18,617	
(*) '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 bank's financial reporting system.										

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance in the Greenville-Anderson-Mauldin, SC MSA, Spartanburg, SC MSA, and South Carolina Non-MSA is consistent with the Outstanding Investment Test performance in the state of South Carolina. Investment Test performance in the Hilton Head Island-Bluffton-Beaufort, SC MSA is weaker than the overall Outstanding Investment Test performance in the state of South Carolina primarily due to lower levels of CD investments relative to the bank's size and resources in the assessment area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of South Carolina is rated Low Satisfactory. Service Test performance is adequate in the Charleston-North Charleston, SC MSA and adequate in the Columbia, SC MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Charleston-North Charleston, SC MSA

In the Charleston-North Charleston, SC MSA, the bank's service delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 16 financial centers with the distribution of the population. The bank has no financial centers in low-income geographies where 4 percent of the population lives. The bank has six financial centers or 37.5 percent of its financial centers located in moderate-income geographies where 22.8 percent of the population lives.

Examiners also considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. The bank demonstrated customer usage of ADS through income proxies based on customers' residency. With cash-dispensing ATMs, full-service ATMs, and text banking, the percentage of customers in low- and moderate-income geographies using the platform exceeded the overall percentage of the population in low- and moderate-income geographies. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies.

The bank has two financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to moderate-income census tracts. The adjacent financial centers help improve access to retail banking services to individuals in moderate-income geographies.

Financial center openings and closings did adversely affect the accessibility of retail banking services, particularly in low-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank closed two financial centers, which included its only financial center in a low-income geography and one in a moderate-income geography.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are consistent throughout the assessment areas. Financial centers are open 9:00 am to 5:00 pm Monday through Thursday, 9:00 am to 6:00 pm Friday, and six of the financial centers are open 9:00 am to 1:00 pm Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Charleston-North Charleston SC MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	9	5.8	26,441	4.0	0	0.0	0	0.0	0	0.0	1	50.0
Moderate	40	25.6	151,752	22.8	5	31.3	16	33.3	0	0.0	1	50.0
Middle	66	42.3	311,687	46.9	7	43.8	22	45.8	0	0.0	0	0.0
Upper	39	25.0	174,727	26.3	4	25.0	10	20.8	0	0.0	0	0.0
NA	2	1.3	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	156	100.0	664,607	100.0	16	100.0	48	100.0	0	100.0	2	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Columbia, SC MSA

In the Columbia, SC MSA, the bank's service delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 17 financial centers with the distribution of the population. The bank has no financial centers in low-income geographies where 3.6 percent of the population lives. The bank has three financial centers or 17.6 percent of its financial centers located in moderate-income geographies where 27.8 percent of the population lives.

Examiners also considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have no material effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies.

The bank has seven financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. Two of the financial centers provide additional access to retail banking services in low-income geographies and five financial centers provide additional access in moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank closed four financial centers. The closures were in middle- and upper-income geographies.

Banking products and services do not vary in a way that inconvenience the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are generally consistent throughout the assessment area. Financial centers are open 9:00 am to 5:00 pm Monday through Friday and 9:00 am to 6:00 pm Friday. All financial centers, except four, are open 9:00 am to 1:00 pm Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Columbia SC MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	10	5.2	27,460	3.6	0	0.0	1	2.1	0	0.0	0	0.0
Moderate	58	30.4	213,489	27.8	3	17.6	7	14.9	0	0.0	0	0.0
Middle	65	34.0	277,315	36.1	8	47.1	25	53.2	0	0.0	3	75.0
Upper	53	27.7	231,646	30.2	6	35.3	14	29.8	0	0.0	1	25.0
NA	5	2.6	17,688	2.3	0	0.0	0	0.0	0	0.0	0	0.0
Totals	191	100.0	767,598	100.0	17	100.0	47	100.0	0	100.0	4	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Charleston-North Charleston, SC MSA

The bank is a leader in providing community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 115 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 71 low- and moderate-income individuals, and provided 4 financial education workshops and 20 foreclosure prevention workshops for 161 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 16 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, four employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Columbia, SC MSA

The bank is a leader in providing community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 38 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 31 low- and moderate-income individuals, and provided 4 financial education workshops for 105 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 28 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 25 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Greenville-Anderson-Mauldin, SC MSA and Spartanburg, SC MSA is stronger than the overall Low Satisfactory Service Test performance in the state of South Carolina. Performance is stronger primarily due to retail banking services that are more accessible, particularly in low-income geographies. Service Test performance in the Hilton Head Island-Bluffton-Beaufort, SC MSA and South Carolina Non-MSA is weaker than the overall Low Satisfactory Service Test performance in the state of South Carolina. Performance is weaker primarily due to limited access to retail banking services in low-income geographies.

State of Tennessee

CRA Rating for Tennessee⁴³: **Outstanding**
The Lending Test is rated: Outstanding
The Investment Test is rated: High Satisfactory
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and excellent distribution of loans by borrower income or business revenue size;
- Relatively low level of CD lending that has a neutral effect on overall lending performance;
- Good level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Tennessee

The state of Tennessee is Bank of America's 19th largest rating area based on its deposits in the state. As of June 30, 2016, the bank maintained approximately \$10.9 billion or 0.9 percent of its total domestic deposits in financial centers within the state of Tennessee. Of the 207 depository financial institutions operating in the state of Tennessee, Bank of America, with a deposit market share of 7.9 percent, is the fourth largest. Competitors with deposit market shares greater than 5 percent include First Tennessee Bank (14.3 percent), Regions Bank (12.9 percent), SunTrust Bank (9.7 percent), and Pinnacle Bank (5.3 percent). As of December 31, 2016, Bank of America operated 58 financial centers and 182 deposit-taking ATMs in Tennessee.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Nashville-Davidson-Murfreesboro-Franklin, TN MSA, Bank of America reported an additional \$2.3 billion in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

⁴³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the community profiles for the state of Tennessee in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Tennessee

Examiners selected two assessment areas for full-scope reviews and the remaining three assessment areas for limited-scope reviews. The full-scope assessment areas were the Memphis, TN MSA and Nashville-Davidson-Murfreesboro-Franklin, TN MSA. While the Nashville-Davidson-Murfreesboro-Franklin, TN MSA carries approximately 77 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in Tennessee, examiners based the conclusions and ratings for the state on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 19,992 home mortgage loans totaling \$3.4 billion, 18,176 small loans to businesses totaling \$520.4 million, 122 small loans to farms totaling \$871,000, and 14 CD loans totaling \$29.8 million. Lending volumes include loans originated or purchased in the Johnson City, TN MSA and the counties of Greene, Humphreys, Lawrence, Marshall, and White, which the bank no longer designates as assessment areas due to the bank's closure or sale of all financial centers and deposit-taking ATMs in those communities. Based on loan volume, examiners weighted home mortgage loans, representing 52.2 percent of the volume, the most followed by small loans to businesses at 47.5 percent, and small loans to farms at less than 1 percent.

Only in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA did the bank originate or purchase a sufficient volume of small loans to farms to provide any meaningful analysis.

The OCC interviewed four community based organizations and local government agencies. The interviewees identified affordable housing, employment, and community services as the most pressing needs of the communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Tennessee is rated Outstanding, based on excellent lending activity, good geographic distribution, and excellent borrower income distribution. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Tennessee is excellent. Lending activity is excellent in each of the assessment areas, including the limited-scope assessment areas.

Memphis, TN MSA

Lending activity in the Memphis, TN MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 5.1 percent. The bank ranks fourth among 37 depository financial institutions, which places it in the top 11 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.5 percent based on the number of home mortgage loans originated or purchased. The bank ranks 17th among 457 home mortgage lenders, which places it in the top 4 percent of lenders competing for loans. According to peer small business data for 2016, the bank has a 5 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fourth among 120 small business lenders, which places it in the top 4 percent of lenders in the MSA. According to peer farm data for 2016, the bank has a market share of 3 percent based on the number of small loans to farms originated or purchased. The bank ranks eighth among 17 farm lenders, which places it in the top 48 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA

Lending activity in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA is excellent. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 16.2 percent. The bank ranks first among 65 depository financial institutions, which places it in the top 2 percent of institutions in the MSA. Excluding the \$2.3 billion in corporate deposits derived from outside the assessment area, the bank's deposit market share declines to 12.4 percent, placing it in the top 3 percent of depository financial institutions. According to peer mortgage data for 2016, the bank has a market share of 1.7 percent based on the number of home mortgage loans originated or purchased. The bank ranks 17th among 719 home mortgage lenders, which places it in the top 3 percent of lenders. According to peer small business data for 2016, the bank has a 7 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fifth among 151 small business lenders, which places it in the top 4 percent of lenders. For small loans to farms, the bank has a market share of 2.2 percent based on the number of small loans to farms originated or purchased. The bank ranks 10th among 29 farm lenders, which places it in the top 35 percent of lenders. Considering the bank's deposits and deposit market share include \$2.3 billion in deposits not derived from the MSA along with the higher ranking for home mortgage loans and small loans to businesses relative to its deposit ranking, overall lending activity is excellent.

LENDING VOLUME		Geography: TENNESSEE						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Memphis, TN	18.39	3,529	498,707	3,490	102,108	25	221	0	0	7,044	601,036	11.26
Nashville, TN	53.95	10,764	2,088,823	9,836	273,653	58	407	8	13,106	20,666	2,375,989	77.05
Limited Review												
Chattanooga, TN	7.78	1,437	227,636	1,538	39,275	3	20	1	150	2,979	267,081	3.73
Clarksville, TN	4.71	1,226	163,750	572	16,605	2	26	4	16,096	1,804	196,477	2.31
Johnson City, TN	1.25	265	34,021	207	4,577	6	41	0	0	478	38,639	0.00
Knoxville, TN	10.92	2,008	336,642	2,155	70,079	17	90	1	450	4,181	407,261	5.66
Tennessee Non-MSA	3.01	763	91,787	378	14,082	11	66	0	0	1,152	105,935	0.00
TENNESSEE	100.00	19,992	3,441,366	18,176	520,379	122	871	14	29,802	38,304	3,992,418	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is good in the Memphis, TN MSA and Nashville-Davidson-Murfreesboro-Franklin, TN MSA.

Memphis, TN MSA

The geographic distribution of home mortgage loans in the Memphis, TN MSA is good. Performance is adequate in low-income geographies and good in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 4 percent is lower than the 9.4 percent of owner-occupied housing units in low-income geographies, but is higher than the 2.6 percent performance for aggregate lenders. The distribution in moderate-income geographies at 13 percent is lower than the 18.2 percent of owner-occupied housing units in moderate-income geographies, but is higher than the 7.7 percent for aggregate lenders.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA

The geographic distribution of home mortgage loans in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA is good. Performance is good in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 3 percent is lower than the 3.3 percent of owner-occupied housing units in low-

income geographies and it is lower than the 3.4 percent performance for aggregate lenders. The distribution in moderate-income geographies at 10.4 percent is lower than the 17.3 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 13.5 percent performance for aggregate lenders.

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
FS Memphis TN-MS-AR MSA	1,497	207,942	18.1	28,576	9.4	4.0	2.6	18.2	13.0	7.7	26.0	23.6	22.6	46.4	59.5	67.1	0.0	0.0	0.0
FS Nashville-Davidson-Murfreesboro-Franklin TN MSA	4,718	980,470	57.1	87,876	3.3	3.0	3.4	17.3	10.4	13.5	46.4	43.0	43.7	33.1	43.6	39.4	0.0	0.0	0.0
LS Chattanooga TN MSA	663	110,096	8.0	13,610	3.4	1.8	2.6	15.6	12.1	13.9	40.2	31.7	34.2	40.7	54.4	49.4	0.0	0.0	0.0
LS Clarksville TN MSA	485	61,240	5.9	10,095	0.5	0.2	0.3	4.7	1.4	2.9	58.9	69.3	67.7	35.9	29.1	29.0	0.0	0.0	0.0
LS Knoxville TN MSA	899	161,670	10.9	30,243	2.0	0.9	1.4	19.7	12.7	14.8	51.4	45.2	50.6	27.0	41.3	33.2	0.0	0.0	0.0
Total	8,262	1,521,418	100.0	170,400	4.3	2.7	2.7	17.4	10.7	12.2	42.8	40.4	42.1	35.5	46.3	43.1	0.0	0.0	0.0

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Memphis, TN MSA and Nashville-Davidson-Murfreesboro-Franklin, TN MSA.

Memphis, TN MSA

The geographic distribution of small loans to businesses in the Memphis, TN MSA is excellent. Performance is good in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 8.2 percent is lower than the 10.7 percent of businesses in low-income geographies, but it is higher than the 7.9 percent performance for aggregate lenders. The distribution in moderate-income geographies at 17 percent is lower than the 18.8 percent of businesses in moderate-income geographies, but it is higher than the 15.8 percent performance for aggregate lenders.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA

The geographic distribution of small loans to businesses in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA is excellent. The distribution is good in low-income geographies and excellent in moderate-income geographies. The geographic distribution in low-income geographies at 7.1 percent is slightly higher than the 6.9 percent of businesses in low-income geographies and it is slightly higher than the 6.9 percent performance for aggregate lenders. The geographic distribution in moderate-income geographies at 20 percent

is slightly lower than the 20.2 percent of businesses in moderate-income geographies, but is higher than the 18.5 percent performance of aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FS Memphis TN-MS-AR MSA	2,231	57,253	19.3	16,061	10.7	8.2	7.9	18.8	17.0	15.8	23.6	20.9	20.2	46.0	53.2	55.2	0.9	0.7	0.8
FS Nashville-Davidson-Murfreesboro-Franklin TN MSA	6,620	158,965	57.2	35,833	7.1	7.1	7.4	20.2	20.0	18.5	35.4	34.4	30.5	36.4	38.0	42.9	0.8	0.5	0.7
LS Chattanooga TN MSA	973	23,355	8.4	7,108	7.0	8.4	8.5	25.0	24.7	25.4	33.9	26.7	30.0	34.0	40.2	36.0	0.1	0.0	0.1
LS Clarksville TN MSA	376	10,501	3.3	1,644	4.7	4.3	3.7	9.9	8.0	7.5	58.1	61.7	56.2	27.3	26.1	32.5	0.0	0.0	0.1
LS Knoxville TN MSA	1,371	40,331	11.8	12,614	4.2	3.1	3.5	21.4	19.0	17.9	42.9	38.6	40.8	30.6	38.7	37.3	0.8	0.7	0.4
Total	11,571	290,405	100.0	73,260	7.3	6.8	6.9	20.4	19.3	18.2	34.7	32.6	30.6	36.9	40.8	43.7	0.7	0.5	0.6

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is good. The distribution is good in the Memphis, TN MSA and Nashville-Davidson-Murfreesboro-Franklin, TN MSA.

Memphis, TN MSA

The geographic distribution of small loans to farms in the Memphis, TN MSA is good, based on poor performance in low-income geographies and excellent performance in moderate-income geographies. The geographic distribution in low-income geographies at 0 percent is lower than the 5.9 percent of farms in low-income geographies and it is lower than the 3 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 14.3 percent is comparable to the 14.4 percent of farms in moderate-income geographies and it is higher than the 10.2 percent for aggregate lenders.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA

The geographic distribution of small loans to farms in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA is good, based on excellent performance in low-income geographies and poor performance in moderate-income geographies. The geographic distribution in low-income geographies at 10 percent is higher than the 2.2 percent of farms in low-income geographies and it is higher than the 0.7 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 12.1 percent is lower than the 19.7 percent of farms in moderate-income geographies and it is significantly lower than the 37.1 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms			Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Memphis TN-MS-AR MSA	16	161	28.0	167	5.9	0.0	3.0	14.4	14.3	10.2	32.9	37.5	56.9	46.4	56.3	29.9	0.4	0.0	0.0
FS Nashville-Davidson-Murfreesboro-Franklin TN MSA	33	253	51.6	450	2.2	10.0	0.7	19.7	12.1	37.1	51.7	48.5	47.1	26.2	36.4	15.1	0.2	0.0	0.0
LS Chattanooga TN MSA	2	12	5.1	21	4.5	0.0	4.8	21.9	100.0	33.3	36.4	0.0	42.9	37.1	0.0	19.0	0.0	0.0	0.0
LS Clarksville TN MSA	1	15	5.6	14	1.4	0.0	0.0	4.5	0.0	0.0	38.0	100.0	21.4	56.1	100.0	78.6	0.0	0.0	0.0
LS Knoxville TN MSA	11	63	20.0	66	1.3	0.0	0.0	23.2	33.3	33.3	51.4	63.6	43.9	23.5	20.0	22.7	0.6	0.0	0.0
Total	64	515	100.0	718	2.9	4.8	1.3	18.9	15.6	29.7	46.1	46.9	48.5	31.8	35.9	20.6	0.3	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is excellent. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is excellent. The distribution is good in the Memphis, TN MSA and excellent in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA.

Memphis, TN MSA

The distribution of home mortgage loans by borrower income in the Memphis, TN MSA is good. The distribution is adequate to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 9.1 percent is lower than the 24.7 percent of low-income families in the MSA; however, the bank’s performance is significantly higher than the 3.1 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 17.6

percent is higher than the 16 percent of moderate-income families and it is higher than the 10.7 percent performance for aggregate lenders.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA

The distribution of home mortgage loans by borrower income in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA is excellent. The distribution is good to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 11.2 percent is lower than the 20.5 percent of low-income families in the MSA; however, it is significantly higher than the 5.5 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 18.5 percent slightly exceeds the 18 percent of moderate-income families in the MSA and it exceeds the 16.2 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Memphis TN-MS-AR MSA	1,497	207,942	18.1	28,576	24.7	9.1	3.1	16.0	17.6	10.7	17.0	19.5	16.0	42.3	35.1	42.0	0.0	18.7	28.2
FS Nashville-Davidson-Murfreesboro-Franklin TN MSA	4,718	980,470	57.1	87,876	20.5	11.2	5.5	18.0	18.5	16.2	21.4	20.5	18.7	40.1	41.8	39.3	0.0	8.0	20.3
LS Chattanooga TN MSA	663	110,096	8.0	13,610	21.9	6.8	5.7	15.8	21.6	17.0	19.5	16.0	18.1	42.8	44.5	38.1	0.0	11.2	21.1
LS Clarksville TN MSA	485	61,240	5.9	10,095	18.8	8.2	2.7	15.5	22.7	10.7	21.9	21.9	22.1	43.8	28.5	26.8	0.0	18.8	37.8
LS Knoxville TN MSA	899	161,670	10.9	30,243	21.4	9.0	6.9	17.0	15.5	16.1	20.9	20.0	18.8	40.7	45.8	38.0	0.0	9.7	20.2
Total	8,262	1,521,418	100.0	170,400	21.8	10.1	5.2	17.0	18.5	15.0	20.1	20.0	18.4	41.2	40.5	38.7	0.0	11.0	22.7

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Memphis, TN MSA and good in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 31 percent of its small loans to businesses.

Memphis, TN MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Memphis, TN MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 56.2 percent is lower than the 73.9 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's

distribution is stronger than the 43.7 percent for aggregate lenders, overall performance is good.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA is good. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 59.7 percent is lower than the 76.4 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 46.3 percent for aggregate lenders, overall performance is good.

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
FS Memphis TN-MS-AR MSA	2,231	57,253	19.3	16,061	73.9	56.2	43.7	6.3	13.5	19.7	30.3
FS Nashville-Davidson-Murfreesboro-Franklin TN MSA	6,620	158,965	57.2	35,833	76.4	59.7	46.3	5.2	9.7	18.4	30.6
LS Chattanooga TN MSA	973	23,355	8.4	7,108	75.5	54.8	42.4	5.1	12.0	19.3	33.2
LS Clarksville TN MSA	376	10,501	3.3	1,644	77.5	62.0	50.3	3.1	8.5	19.4	29.5
LS Knoxville TN MSA	1,371	40,331	11.8	12,614	75.5	49.0	46.9	5.5	14.4	19.0	36.5
Total	11,571	290,405	100.0	73,260	75.6	57.4	45.6	5.5	11.2	18.9	31.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The distribution is adequate in the Memphis, TN MSA and adequate in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 39 percent of its small loans to farms.

Memphis, TN MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Memphis, TN MSA is adequate. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 50 percent is lower than the 94.6 percent of farms with gross annual revenues of \$1 million or less. The bank’s distribution is also lower than the 51.5 percent for aggregate lenders.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA is adequate. Based on farms with known

revenues, the proportion of the bank’s small loans to farms at 57.6 percent is lower than the 96.8 percent of farms with gross annual revenues of \$1 million or less. The bank’s distribution is also lower than the 62.7 percent for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Memphis TN-MS-AR MSA	16	161	26.1	167	94.6	50.0	51.5	3.4	0.0	1.9	66.7
FS Nashville-Davidson-Murfreesboro-Franklin TN MSA	33	253	51.6	450	96.8	57.6	62.7	1.7	0.0	1.5	42.4
LS Chattanooga TN MSA	2	12	5.1	21	96.9	100.0	38.1	1.2	0.0	1.9	0.0
LS Clarksville TN MSA	2	26	5.1	14	98.1	100.0	57.1	1.2	0.0	0.7	0.0
LS Knoxville TN MSA	11	63	17.2	66	96.6	72.7	39.4	1.4	0.0	2.0	27.3
Total	64	515	100.0	718	96.4	60.9	57.1	1.9	0.0	1.7	39.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect overall on the bank’s Lending Test performance in the state of Tennessee.

Memphis, TN MSA

In the Memphis, TN MSA, CD lending has a negative effect on lending performance in the assessment area. During the five-year evaluation period, Bank of America did not originate any CD loans.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA

In the Nashville-Davidson-Murfreesboro-Franklin, TN MSA, CD lending has a neutral effect on lending performance in the assessment area. During the evaluation period, the bank originated eight CD loans totaling \$13.1 million that mostly helped provide 96 units of affordable housing. CD lending represents 1.7 percent of the allocated Tier 1 Capital, after considering \$2.3 billion in deposits from national corporations in which the deposits did not derive from the local community.

Examples of significant CD loans include:

- The bank provided \$3.5 million in construction financing to develop Dickson Gardens Apartments, a 48-unit affordable multifamily housing project in Dickson, TN for seniors. All units are restricted to incomes at or below 60 percent of the area median income. The bank also provided a \$1.7 million loan to extend the construction loan by six months.
- The bank provided two three-month extensions of a \$1.7 million construction loan to develop the Gallatin Park Apartments, a 48-unit LIHTC development for families located in Gallatin, TN. All units are restricted to incomes at or below 60 percent of the area median income.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Tennessee, lending under the MHA and HARP programs accounted for 74 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance in the Chattanooga, TN MSA, Clarksville, TN MSA, and Knoxville, TN MSA is weaker than the overall Outstanding Lending Test performance in the state of Tennessee primarily due to weaker geographic distributions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Tennessee is rated High Satisfactory. Investment performance is poor in the Memphis, TN MSA and excellent in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA. Performance in limited-scope assessment areas has a positive effect on the state rating.

Memphis, TN MSA

In the Memphis, TN MSA, Bank of America has a poor level of CD investments. The bank made 27 CD investments during the evaluation period totaling \$6.7 million. Approximately \$3.7 million or 55 percent of the current period investment dollars supported 313 units of affordable housing and approximately \$3 million or 45 percent supported community development services. In addition, the bank has 11 CD investments totaling \$2.3 million it made during a prior evaluation period that are still outstanding and continuing to provide benefit to the community. Prior period and current period investments total \$9.1 million or 5.6 percent of allocated Tier 1 Capital. Current period investments are generally neither innovative nor complex, which consisted mostly of investments in CDFIs and mortgage-backed securities. Investments in more complex LIHTCs represented approximately \$2.7 million or 40 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$2.5 million in a national LIHTC fund, which owns a portfolio of 11 LIHTC properties. The investment amount represents the funding allocated to Southwind Lakes, a newly constructed 200-unit multifamily affordable housing

development located in Memphis, TN. Units are restricted to families with incomes at or below 60 percent of the area median income.

- The bank made a \$2.5 million deposit in Citizens Savings Bank and Trust (CSBT), a certified CDFI and minority depository institution. CSBT is one of the nation's oldest minority-owned banking institutions serving economically distressed communities. This amount represents CSBT's program that supports new lending and investment opportunities within CSBT's Memphis market.
- The bank invested nearly \$200,000 in the National Federation of Community Development Credit Unions (the Federation). The Federation is a CDFI with a mission to help low- and moderate-income individuals and communities achieve financial independence through Community Development Credit Unions (CDCUs). This investment represents the allocated portion of a larger \$1.5 million commitment to the Federation. All CDCUs have a National Credit Union Association (NCUA) low-income designation, where a majority of members earns at or below 80 percent of the median family income.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA

In the Nashville-Davidson-Murfreesboro-Franklin, TN MSA, the bank has an excellent level of CD investments. The bank made 206 CD investments during the evaluation period totaling \$103.5 million. Approximately \$77.6 million or 75 percent of the current period investment dollars supported 650 units of affordable housing. In addition, the bank has 87 CD investments totaling \$8.5 million it made during a prior evaluation period that are still outstanding and continuing to provide benefit to the community. Prior period and current period investments total \$112 million or 14.6 percent of allocated Tier 1 Capital, after considering the \$2.3 billion in deposits that did not originate from the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$76.8 million or 74 percent of the investment dollars.

Examples of community development investments include:

- The bank provided \$200,000 in grants to Project Return, an organization with a mission to provide services to and connect former inmates with resources needed to successfully return to work and the community after incarceration.
- The bank recorded \$22.5 million in investments representing an annual renewal of a \$5 million deposit in CSBT. CSBT is one of the nation's oldest minority-owned banking institutions serving economically distressed communities. The funds support CSBT's program for lending and investing opportunities within Nashville, TN. In 2014, the bank allocated \$2.5 million of the renewal amount to the Memphis, TN MSA.

QUALIFIED INVESTMENTS		Geography: TENNESSEE				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Memphis, TN	11	2,345	27	6,717	38	9,063	6.50	0	0	
Nashville, TN	87	8,450	206	103,521	293	111,971	80.36	1	1,201	
Limited Review										
Chattanooga, TN	8	2,402	15	887	23	3,289	2.36	0	0	
Clarksville, TN	7	232	21	1,132	28	1,365	0.98	0	0	
Knoxville, TN	4	110	27	2,529	31	2,639	1.89	0	0	
TENNESSEE - Statewide	0	0	15	217	15	217	0.16	0	0	
TENNESSEE - Non Assessed	41	4,386	44	6,401	85	10,787	7.74	1	153	
TENNESSEE	158	17,926	355	121,405	513	139,331	100.00	2	1,354	
(*) '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 bank's financial reporting system.										

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance varied across the limited-scope assessment areas. Performance in the Chattanooga, TN MSA, Clarksville, TN MSA, and Knoxville, TN MSA is weaker than the overall High Satisfactory Investment Test performance in the state of Tennessee. Performance is weaker primarily due to lower levels of investments relative to the bank's capacity in those assessment areas.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Tennessee is rated Outstanding. Service Test performance in the Memphis, TN MSA is adequate. However, the excellent Service Test performance in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA primarily drives the overall conclusion. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Memphis, TN MSA

In the Memphis, TN MSA, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 14 financial centers with the distribution of the population. The bank has no financial centers in low-income geographies where 15.3 percent of the population lives. The bank has six financial centers or 43 percent of its financial centers located in moderate-income geographies where 22.1 percent of the population lives.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have no effect on the retail banking services conclusion.

The bank has four financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. Two of the financial centers are adjacent to low-income geographies where no financial centers are located. The adjacent financial centers help improve access to retail banking services to individuals in low- and moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank closed three financial centers: two in middle-income geographies and one in an upper-income geography.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are more restrictive in moderate-income geographies. Financial centers are generally open 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 5:00 pm Friday, and 9:00 am to 12:00 pm Saturday. Three of the five financial centers (60 percent), closed for Saturday banking, are located in moderate-income geographies, representing 50 percent of the financial centers in moderate-income geographies.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Memphis TN-MS-AR MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	54	22.0	157,066	15.3	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	55	22.4	226,921	22.1	6	42.9	16	37.2	0	0.0	0	0.0
Middle	59	24.1	255,846	24.9	3	21.4	13	30.2	0	0.0	2	66.7
Upper	72	29.4	382,420	37.2	5	35.7	14	32.6	0	0.0	1	33.3
NA	5	2.0	4,885	0.5	0	0.0	0	0.0	0	0.0	0	0.0
Totals	245	100.0	1,027,138	100.0	14	100.0	43	100.0	0	100.0	3	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Nashville-Davidson-Murfreesboro-Franklin, TN MSA

In the Nashville-Davidson-Murfreesboro-Franklin, TN MSA, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 32 financial centers with the distribution of the population. The bank has 5 financial centers or 15.6 percent of all financial centers in low-income geographies where 6.8 percent of the population lives. The bank also has five financial centers or 15.6 percent of its financial centers located in moderate-income geographies where 20.9 percent of the population lives.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly

positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The proportions of customers in low- and moderate-income geographies using online, telephone, mobile, and text banking are near the proportion of the population in low- and moderate-income geographies. Cash dispensing and full-service ATM usage by customers in low- and moderate-income geographies exceeds the proportion of the population in low- and moderate-income geographies.

The bank has 10 financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. Three of the financial centers provide additional access to retail banking services in low-income geographies and seven financial centers provide additional access in moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center and closed six. The bank closed one financial center in a low-income geography, two in moderate-income geographies, and the remaining three in middle- and upper-income geographies. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconvenience the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Hours of operation are more restrictive in moderate-income geographies. Financial centers are generally open 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 5:00 pm Friday, and 9:00 am to 1:00 pm Saturday. All financial centers except four are open for Saturday banking, including one financial center in a low-income census tract and one financial center in a moderate-income census tract.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Nashville-Davidson-Murfreesboro-Franklin TN MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	32	8.4	114,002	6.8	5	15.6	12	11.8	0	0.0	1	16.7
Moderate	82	21.6	348,844	20.9	5	15.6	21	20.6	0	0.0	2	33.3
Middle	160	42.1	714,918	42.8	10	31.3	36	35.3	0	0.0	2	33.3
Upper	102	26.8	488,222	29.2	11	34.4	30	29.4	1	100.0	1	16.7
NA	4	1.1	4,904	0.3	1	3.1	3	2.9	0	0.0	0	0.0
Totals	380	100.0	1,670,890	100.0	32	100.0	102	100.0	1	100.0	6	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Memphis, TN MSA

The bank provides a limited level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 83 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 69 low- and moderate-income individuals, and provided one foreclosure prevention workshop for 246 individuals. Employees

participated in 13 webinars and workshops with non-profit organizations to help the organizations with capacity building. No employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA

The bank provides a high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 69 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 2 low- and moderate-income individuals, and provided 13 financial education workshops and 10 foreclosure prevention workshops for 365 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 23 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 21 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance in the Chattanooga, TN MSA is consistent with the Outstanding Service Test performance in the state of Tennessee. Performance in the Clarksville, TN MSA and Knoxville, TN MSA is weaker than the overall Outstanding Service Test performance in the state of Tennessee primarily due to weaker financial center distributions. Each of these two assessment areas has only four financial centers.

State of Texas

CRA Rating for Texas⁴⁴: **Outstanding**
The Lending Test is rated: **Outstanding**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **Outstanding**

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Excellent distribution of loans by geography and good distribution of loans by borrower income or business/farm revenue size;
- Relatively high level of CD lending that has a neutral effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Texas

The state of Texas is Bank of America's fourth largest rating area based on its total deposits in the state. As of June 30, 2016, the bank maintained approximately \$113.4 billion or 9.4 percent of its total domestic deposits in financial centers within the state of Texas. Of the 533 depository financial institutions operating in the state of Texas, Bank of America, with a deposit market share of 14.8 percent, is the second largest. The largest banking institution in the state is JPMorgan Chase with \$151.4 billion in deposits or 19.7 percent market share. Other large depository financial institutions include third ranked Well Fargo Bank (\$71.9 billion or 9.3 percent market share) and fourth ranked USAA Federal Savings Bank (\$67.6 billion or 8.8 percent market share). The remaining depository financial institutions each have less than 5 percent market share. As of December 31, 2016, Bank of America operated 385 full-service financial centers and 1,372 deposit-taking ATMs in the state.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In the Dallas-Fort Worth-Arlington, TX MSA, Bank of America reported an additional \$9.8 billion in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the

⁴⁴ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

Refer to the community profiles for the state of Texas in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Texas

Examiners selected four assessment areas for full-scope reviews and the remaining 19 assessment areas for limited-scope reviews. The full-scope assessment areas selected included the Austin-Round Rock, TX MSA, Dallas-Fort Worth-Arlington, TX MSA, Houston-The Woodlands-Sugar Land, TX MSA, and San Antonio-New Braunfels, TX MSA. Examiners based the conclusions and ratings on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 97,400 home mortgage loans totaling \$18.7 billion, 149,027 small loans to businesses totaling \$4.2 billion, 1,174 small loans to farms totaling \$20.4 million, and 120 CD loans totaling \$881 million. Lending volumes include loans originated or purchased in the Longview, TX MSA, Sherman-Denison, TX MSA, and Texas Non-MSA (counties of Angelina, Brown, Dallam, Franklin, Moore, Navarro, Titus, Uvalde, and Walker). The bank no longer designates these communities as assessment areas due to the bank's closure or sale of all financial centers and deposit-taking ATMs in those communities. Based on loan volume, examiners weighted small loans to businesses, representing 60 percent of the volume, the heaviest, followed by home mortgage lending (39 percent of volume), and small loans to farms (0.5 percent).

The OCC interviewed 14 community based organizations and local government agencies serving various housing, employment, and community service needs. The organizations identified affordable owner-occupied and rental housing, funding to acquire land to construct new home developments, down-payment and closing cost assistance, financial literacy, and economic development as some of the most pressing needs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

Conclusions in the state of Texas

Bank of America's performance under the Lending Test in the state of Texas is rated Outstanding, based on excellent lending activity, excellent geographic distribution, and good borrower income distribution. CD lending has no effect on the overall Lending Test performance. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Texas is

excellent. Lending activity is excellent in the Austin-Round Rock, TX MSA, Dallas-Fort Worth-Arlington, TX MSA, Houston-The Woodlands-Sugar Land, TX MSA, and San Antonio-New Braunfels, TX MSA, and good in the. Although the Lending activity varied across the limited-scope assessment areas, the bank's Lending activity was generally consistent with the performance in the full-scope assessment areas.

Austin-Round Rock, TX MSA

Lending activity in the Austin-Round Rock, TX MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 19.1 percent. The bank ranks second among 67 depository financial institutions within the assessment area, which places it in the top 3 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.6 percent based on the number of home mortgage loans originated or purchased. The bank ranks 14th among 788 home mortgage lenders, which places it in the top 2 percent of lenders. Based on peer small business data for 2016, the bank has a 7 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fifth among 177 small business lenders in the assessment area, which places it in the top 3 percent of lenders. For small loans to farms, the bank has a market share of 5.7 percent based on the number of small loans to farms originated or purchased. The bank ranks seventh among 28 farm lenders, which places it in the top 25 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and similar ranking for small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

Dallas-Fort Worth-Arlington, TX MSA

Lending activity in the Dallas-Fort Worth-Arlington, TX MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 29.2 percent. The bank ranks first among 147 depository financial institutions within the assessment area, which places it in the top 1 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.3 percent based on the number of home mortgage loans originated or purchased. The bank ranks sixth among 1,021 home mortgage lenders, which places it in the top 1 percent of lenders. Based on peer small business data for 2016, the bank has an 8.1 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fourth among 238 small business lenders in the assessment area, which places it in the top 2 percent of lenders. For small loans to farms, the bank has a market share of 5.7 percent based on the number of small loans to farms originated or purchased. The bank ranks eighth among 54 farm lenders, which places it in the top 15 percent of lenders. Considering the bank's similar ranking among all lenders for home mortgage loans and high ranking for small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

Houston-The Woodlands-Sugar Land, TX MSA

Lending activity in the Houston-The Woodlands-Sugar Land, TX MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 9.5 percent. The bank ranks third among 95 depository financial institutions within the assessment area, which places it in the top 4 percent of institutions. According to peer mortgage data for

2016, the bank has a market share of 2.5 percent based on the number of home mortgage loans originated or purchased. The bank ranks fourth among 905 home mortgage lenders, which places it in the top 1 percent of lenders. Based on peer small business data for 2016, the bank has a 7.4 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks sixth among 211 small business lenders in the assessment area, which places it in the top 3 percent of lenders. For small loans to farms, the bank has a market share of 6.7 percent based on the number of small loans to farms originated or purchased. The bank ranks sixth among 41 farm lenders, which places it in the top 15 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

San Antonio-New Braunfels, TX MSA

Lending activity in the San Antonio-New Braunfels, TX MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 3.7 percent. The bank ranks fourth among 61 depository financial institutions within the assessment area, which places it in the top 7 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 1.3 percent based on the number of home mortgage loans originated or purchased. The bank ranks 18th among 694 home mortgage lenders, which places it in the top 3 percent of lenders. Based on peer small business data for 2016, the bank has a 5.7 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks sixth among 157 small business lenders in the assessment area, which places it in the top 4 percent of lenders. For small loans to farms, the bank has a market share of 6.4 percent based on the number of small loans to farms originated or purchased. The bank ranks fifth among 27 farm lenders, which places it in the top 19 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: TEXAS						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Austin, TX	10.14	9,588	2,163,728	15,430	459,402	86	2,901	17	111,988	25,121	2,738,019	6.78
Dallas, TX	37.07	34,764	7,178,705	56,699	1,596,711	321	3,611	35	344,546	91,819	9,123,573	63.12
Houston, TX	31.35	30,660	6,228,742	46,721	1,345,993	237	2,700	37	234,218	77,655	7,811,653	18.05
San Antonio, TX	7.59	8,013	1,286,569	10,682	325,801	96	1,710	9	60,717	18,800	1,674,797	3.33
Limited Review												
Abilene, TX	0.37	363	41,566	531	8,695	30	211	0	0	924	50,472	0.20
Amarillo, TX	0.65	747	93,929	840	21,447	23	238	0	0	1,610	115,614	0.43
Beaumont, TX	0.67	710	87,444	951	28,043	4	37	4	26,540	1,669	142,064	0.35
Brownsville, TX	0.59	816	83,182	639	13,041	9	102	0	0	1,466	96,325	0.13
College Station, TX	0.57	622	105,208	745	22,132	36	280	0	0	1,403	127,620	0.30
Corpus Christi, TX	1.35	1,549	211,516	1,731	40,573	62	4,394	1	1,850	3,343	258,333	0.59
El Paso, TX	2.17	2,133	238,399	3,210	76,880	19	160	11	59,725	5,373	375,164	3.42
Killeen, TX	1.00	1,372	159,945	1,091	22,318	22	111	0	0	2,485	182,374	0.22
Laredo, TX	0.55	573	67,881	784	16,062	9	56	1	1,950	1,367	85,949	0.08
Longview, TX	0.14	127	15,003	205	2,863	12	886	0	0	344	18,752	0.00
Lubbock, TX	0.58	643	87,725	762	16,377	26	177	0	0	1,431	104,279	0.25
McAllen, TX	1.57	1,522	164,115	2,329	45,203	47	1,228	0	0	3,898	210,546	0.42
Midland, TX	0.44	311	131,346	754	12,365	15	159	3	25,717	1,083	169,587	0.78
Odessa, TX	0.35	306	53,557	566	11,888	1	7	1	7,918	874	73,370	0.10
San Angelo, TX	0.31	212	22,284	547	11,699	4	74	0	0	763	34,057	0.11
Sherman, TX	0.14	202	23,555	138	5,072	7	32	0	0	347	28,659	0.00
Tyler, TX	0.67	577	87,351	1,067	28,117	6	78	0	0	1,650	115,546	0.61
Victoria, TX	0.20	171	21,341	320	5,060	14	467	0	0	505	26,868	0.07
Waco, TX	0.60	631	80,478	819	22,116	24	199	0	0	1,474	102,793	0.33
Wichita Falls, TX	0.24	192	19,837	384	9,535	10	63	0	0	586	29,435	0.16
Texas Non-MSA	0.70	594	82,601	1,082	21,902	54	486	1	5,755	1,731	110,744	0.17
TEXAS	100.00	97,400	18,736,007	149,027	4,169,295	1,174	20,367	120	880,925	247,721	23,806,594	100.00

(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.

Distribution of Loans by Income Level of the Geography

The bank's geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is good in the Austin-Round Rock, TX MSA, Dallas-Fort Worth-Arlington, TX MSA, Houston-The Woodlands-Sugar Land, TX MSA, and adequate in the San Antonio-New Braunfels, TX MSA.

Austin-Round Rock, TX MSA

The geographic distribution of home mortgage loans in the Austin-Round Rock, TX MSA is good. Performance is good in both low- and moderate-income geographies. The distribution of

the bank's home mortgage loans in low-income geographies at 3.1 percent is lower than the 4.3 percent of owner-occupied housing units in low-income geographies, but it is consistent with the performance of aggregate lenders. The distribution in moderate-income geographies at 16.1 percent is also lower than the 18.4 percent of owner-occupied housing units in moderate-income geographies, but is higher than the 15.9 percent performance for aggregate lenders.

Dallas-Fort Worth-Arlington, TX MSA

The geographic distribution of home mortgage loans in the Dallas-Fort Worth-Arlington, TX MSA is good. Performance is adequate in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 2.3 percent is lower than the 4.6 percent of owner-occupied housing units in low-income geographies and it is slightly higher than the 1.9 percent performance for aggregate lenders. The distribution in moderate-income geographies at 11.7 percent is lower than the 19.3 percent of owner-occupied housing units in moderate-income geographies, but is higher than the 10.1 percent for aggregate lenders.

Houston-The Woodlands-Sugar Land, TX MSA

The geographic distribution of home mortgage loans in the Houston-The Woodlands-Sugar Land, TX MSA is good. Performance is adequate in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 1.9 percent is lower than the 4 percent of owner-occupied housing units in low-income geographies and it is higher than the 1.6 percent performance for aggregate lenders. The distribution in moderate-income geographies at 14 percent is lower than the 21.2 percent of owner-occupied housing units in moderate-income geographies, but is higher than the 10.9 percent performance for aggregate lenders.

San Antonio-New Braunfels, TX MSA

The geographic distribution of home mortgage loans in the San Antonio-New Braunfels, TX MSA is adequate. Performance is adequate in both low- and moderate-income geographies. The distribution in low-income geographies at 2 percent is lower than the 4.2 percent of owner-occupied housing units in low-income geographies, but it is higher than the 1.4 percent performance for aggregate lenders. The distribution in moderate-income geographies at 12.6 percent is lower than the 22.8 percent of owner-occupied housing units in moderate-income geographies, but is higher than the 10.5 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Austin-Round Rock TX MSA	4,591	1,160,988	9.5	89,146	4.3	3.1	3.1	18.4	16.1	15.9	38.9	35.6	39.9	38.5	45.3	41.1	0.0	0.0	0.0
FS Dallas-Fort Worth-Arlington TX MSA	18,159	3,948,283	37.5	261,642	4.6	2.3	1.9	19.3	11.7	10.1	34.3	29.0	33.2	41.7	57.0	54.8	0.0	0.0	0.0
FS Houston-The Woodlands-Sugar Land TX MSA	14,987	3,221,800	30.9	191,261	4.0	1.9	1.6	21.2	14.0	10.9	30.4	28.6	29.4	44.4	55.5	58.1	0.0	0.0	0.0
FS San Antonio-New Braunfels TX MSA	3,815	638,889	7.9	80,065	4.2	2.0	1.4	22.8	12.6	10.5	35.9	34.2	34.1	37.1	51.2	54.0	0.0	0.0	0.0
LS Abilene TX MSA	195	23,084	0.4	5,036	1.7	1.0	1.0	18.3	16.4	11.3	51.3	47.2	40.0	28.7	35.4	47.7	0.0	0.0	0.1
LS Amarillo TX MSA	366	44,130	0.8	8,056	7.2	1.6	2.1	14.9	13.1	8.2	41.1	38.8	38.0	36.9	46.4	51.8	0.0	0.0	0.0
LS Beaumont-Port Arthur TX MSA	312	37,719	0.6	7,553	2.3	1.0	0.7	20.5	9.0	7.5	44.1	46.8	45.4	33.1	42.6	45.9	0.0	0.6	0.4
LS Brownsville-Harlingen TX MSA	405	38,448	0.8	5,164	1.0	0.2	0.2	23.6	25.9	11.4	47.5	42.5	45.2	27.8	31.4	43.2	0.0	0.0	0.0
LS College Station-Bryan TX MSA	281	58,425	0.6	6,444	4.6	4.6	4.4	22.6	16.4	12.3	36.7	27.8	33.1	36.0	50.9	50.2	0.0	0.4	0.0
LS Corpus Christi TX MSA	799	105,759	1.6	11,571	6.4	3.0	1.8	19.1	8.3	7.2	42.4	37.4	40.2	32.1	51.3	50.8	0.0	0.0	0.0
LS El Paso TX MSA	1,077	118,045	2.2	17,278	1.7	1.1	0.5	28.8	18.8	16.8	31.4	34.9	36.6	38.1	45.2	46.1	0.0	0.0	0.0
LS Killeen-Temple TX MSA	638	69,625	1.3	13,886	1.2	0.3	0.3	9.0	8.8	6.5	63.4	60.0	60.2	26.3	30.9	33.0	0.0	0.0	0.0
LS Laredo TX MSA	290	34,272	0.6	4,181	1.8	0.3	0.5	26.6	5.5	9.5	36.1	30.7	31.0	35.5	63.4	59.1	0.0	0.0	0.0
LS Lubbock TX MSA	307	48,122	0.6	9,812	4.0	1.6	1.9	19.0	11.4	11.3	37.7	34.9	35.4	39.3	52.1	51.4	0.0	0.0	0.0
LS McAllen-Edinburg-Mission TX MSA	810	85,347	1.7	9,840	0.6	0.0	0.1	28.5	16.7	14.7	42.2	34.3	34.6	28.7	49.0	50.6	0.0	0.0	0.0
LS Midland TX MSA	188	111,147	0.4	5,845	4.5	0.5	2.1	17.1	15.4	9.3	48.0	44.7	42.6	30.4	39.4	45.9	0.0	0.0	0.1
LS Odessa TX MSA	186	39,390	0.4	3,565	0.0	0.0	0.0	21.9	12.4	8.3	48.0	39.8	33.8	30.1	47.8	57.9	0.0	0.0	0.0
LS San Angelo TX MSA	112	12,603	0.2	3,534	1.3	1.8	0.6	25.7	17.0	15.8	44.5	52.7	47.8	28.5	28.6	35.9	0.0	0.0	0.0
LS Tyler TX MSA	279	44,792	0.6	6,011	1.2	0.0	0.6	21.7	10.8	10.8	42.2	43.4	42.2	34.9	45.9	46.4	0.0	0.0	0.0
LS Victoria TX MSA	82	9,277	0.2	2,194	3.2	0.0	0.5	14.6	20.7	10.5	50.1	42.7	49.2	32.0	36.6	39.9	0.0	0.0	0.0
LS Waco TX MSA	340	42,809	0.7	6,201	5.4	3.2	3.5	15.4	11.8	9.2	33.5	21.8	24.3	45.7	63.2	63.1	0.0	0.0	0.0
LS Wichita Falls TX MSA	91	9,483	0.2	3,837	1.9	0.0	0.7	13.0	8.8	7.0	45.6	49.5	40.8	39.5	41.8	51.5	0.0	0.0	0.0
LS Texas Non-MSA	139	22,165	0.3	2,614	0.0	0.0	0.0	5.9	5.8	5.5	61.9	64.0	61.3	32.2	30.2	33.2	0.0	0.0	0.0
Total	48,449	9,924,602	100.0	754,736	3.9	2.1	1.8	20.5	13.2	11.1	36.0	31.4	34.5	39.6	53.3	52.6	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "-" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Austin-Round Rock, TX MSA, Dallas-Fort Worth-Arlington, TX MSA, Houston-The Woodlands-Sugar Land, TX MSA, and San Antonio-New Braunfels, TX MSA.

Austin-Round Rock, TX MSA

The geographic distribution of small loans to businesses in the Austin-Round Rock, TX MSA is excellent. Performance is good in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 5.7 percent is lower than the 6.2 percent of businesses in low-income geographies and it is lower than the 6.2 percent performance for aggregate lenders. The distribution in moderate-income geographies at 16.8 percent is lower than the 17.8 percent of businesses in moderate-income geographies, but is consistent with the 16.8 percent performance for aggregate lenders.

Dallas-Fort Worth-Arlington, TX MSA

The geographic distribution of small loans to businesses in the Dallas-Fort Worth-Arlington, TX MSA is excellent. Performance is good in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 6.6 percent is slightly lower than the 6.9 percent of businesses in low-income geographies and it is slightly lower than the 6.9 percent performance for aggregate lenders. The distribution in moderate-income geographies at 17.9 percent is slightly lower than the 18.6 percent of businesses in moderate-income geographies, but is slightly higher than the 17.6 percent performance for aggregate lenders.

Houston-The Woodlands-Sugar Land, TX MSA

The geographic distribution of small loans to businesses in the Houston-The Woodlands-Sugar Land, TX MSA is excellent. Performance is excellent in both low- and moderate-income geographies. The distribution in low-income geographies at 7.6 percent is slightly lower than the 8 percent of businesses in low-income geographies, but is slightly higher than the 7.5 percent performance for aggregate lenders. The distribution in moderate-income geographies at 18.9 percent is slightly lower than the 19.6 percent of businesses in moderate-income geographies, but is slightly higher than the 18.2 percent performance for aggregate lenders.

San Antonio-New Braunfels, TX MSA

The geographic distribution of small loans to businesses in the San Antonio-New Braunfels, TX MSA is excellent. Performance is good in low-income geographies and excellent in moderate-income geographies. The distribution in low-income geographies at 4.2 percent is slightly lower than the 4.6 percent of businesses in low-income geographies and it is slightly lower than the 4.6 percent performance for aggregate lenders. The distribution in moderate-income geographies at 20 percent is slightly lower than the 20.6 percent of businesses in moderate-income geographies, but is slightly higher than the 18.2 percent performance for aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate
FS Austin-Round Rock TX MSA	10,052	277,206	10.4	52,714	6.2	5.7	6.2	17.8	16.8	16.8	30.9	29.8	30.6	45.1	47.6	46.3	0.1	0.1	0.1
FS Dallas-Fort Worth-Arlington TX MSA	37,561	965,288	38.6	169,819	6.9	6.6	6.9	18.6	17.9	17.6	29.8	26.3	27.8	44.5	48.8	47.5	0.2	0.4	0.1
FS Houston-The Woodlands-Sugar Land TX MSA	31,121	858,535	32.0	154,577	8.0	7.6	7.5	19.6	18.9	18.2	25.2	23.9	25.0	47.1	49.5	49.3	0.1	0.0	0.0
FS San Antonio-New Braunfels TX MSA	6,773	171,449	7.0	41,872	4.6	4.2	4.6	20.6	20.0	18.2	33.0	30.3	30.1	41.6	45.4	46.8	0.2	0.1	0.2
LS Abilene TX MSA	362	6,123	0.4	2,876	1.6	1.9	1.5	21.7	21.5	21.9	50.7	47.2	48.5	25.1	28.7	27.7	0.9	0.9	0.3
LS Amarillo TX MSA	492	9,497	0.5	5,110	19.5	17.7	16.6	10.9	12.4	8.3	36.1	34.6	35.1	33.3	35.4	40.0	0.2	0.0	0.1
LS Beaumont-Port Arthur TX MSA	552	14,169	0.7	6,075	2.3	0.7	1.7	24.9	26.8	23.6	38.1	35.9	36.5	34.5	36.6	37.9	0.2	0.7	0.2
LS Brownsville-Harlingen TX MSA	426	6,507	0.4	5,783	3.8	3.1	4.0	27.8	27.0	26.4	37.4	41.1	38.2	30.7	28.4	31.3	0.3	0.7	0.2
LS College Station-Bryan TX MSA	492	14,094	0.5	3,945	8.0	6.9	6.2	20.7	16.3	19.3	38.7	38.6	38.3	32.2	38.2	36.1	0.4	0.0	0.1
LS Corpus Christi TX MSA	1,058	24,241	1.1	7,302	14.1	9.1	14.4	17.8	14.7	18.0	38.9	40.9	37.0	29.0	35.4	30.5	0.3	0.0	0.1
LS El Paso TX MSA	2,206	51,147	2.3	12,304	7.0	6.1	6.2	28.7	29.6	29.1	27.3	28.6	27.0	36.2	35.3	37.3	0.7	0.4	0.4
LS Killeen-Temple TX MSA	685	16,381	0.7	4,194	1.5	0.9	1.2	18.4	14.3	16.5	54.6	57.4	52.4	24.8	27.2	29.9	0.8	0.4	0.0
LS Laredo TX MSA	516	9,489	0.6	5,501	0.8	0.6	0.4	22.0	20.7	16.9	29.8	23.1	25.5	47.0	55.2	56.8	0.3	1.2	0.5
LS Lubbock TX MSA	460	8,449	0.5	5,968	5.3	4.8	4.7	15.2	13.3	11.5	39.6	34.1	38.6	39.8	47.8	45.2	0.1	0.0	0.1
LS McAllen-Edinburg-Mission TX MSA	1,572	31,007	1.7	12,024	0.3	0.2	0.3	22.9	21.4	21.9	36.1	36.3	36.3	40.5	42.0	41.4	0.1	0.2	0.1
LS Midland TX MSA	476	6,924	0.5	3,159	2.4	3.4	3.1	26.1	22.7	23.5	40.1	45.4	43.8	30.7	28.6	29.0	0.7	0.0	0.6
LS Odessa TX MSA	339	7,729	0.3	2,415	0.0	0.0	0.0	17.5	16.8	15.3	46.0	44.5	44.0	36.5	38.6	40.7	0.0	0.0	0.0
LS San Angelo TX MSA	331	6,653	0.3	1,615	11.2	6.9	7.7	15.7	13.6	16.2	44.1	37.8	44.8	28.7	41.4	30.8	0.3	0.9	0.5
LS Tyler TX MSA	643	17,574	0.7	4,774	8.4	7.0	7.3	19.9	16.8	17.6	34.8	37.9	35.6	36.8	38.1	39.2	0.2	0.5	0.3
LS Victoria TX MSA	183	2,311	0.2	1,798	2.8	3.8	3.2	19.3	19.1	19.1	50.1	47.5	47.6	27.7	29.5	29.9	0.1	0.0	0.3
LS Waco TX MSA	506	11,398	0.5	3,300	5.4	4.9	5.2	20.9	17.8	17.6	32.8	29.6	32.5	40.4	47.6	44.3	0.6	0.0	0.3
LS Wichita Falls TX MSA	233	7,617	0.2	1,696	3.7	5.2	4.2	22.1	21.9	23.0	33.6	24.5	30.5	40.4	48.5	42.2	0.1	0.0	0.1
LS Texas Non-MSA	340	6,086	0.3	2,490	0.0	0.0	0.0	6.4	11.2	4.5	66.7	60.9	67.0	26.9	27.9	28.5	0.0	0.0	0.0
Total	97,379	2,529,874	100.0	511,311	6.7	6.4	6.4	19.5	18.6	18.2	30.6	27.6	29.1	43.0	47.3	46.1	0.2	0.2	0.1

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data: 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is adequate. The distribution is poor in the Austin-Round Rock, TX MSA, adequate in the Dallas-Fort Worth-Arlington, TX MSA, good in the Houston-The Woodlands-Sugar Land, TX MSA, and excellent in the San Antonio-New Braunfels, TX MSA.

Austin-Round Rock, TX MSA

The geographic distribution of small loans to farms in the Austin-Round Rock, TX MSA is poor. Performance is very poor in low-income geographies and good in moderate-income

geographies. The distribution in low-income geographies at 0 percent is lower than the 3.7 percent of farms in low-income geographies and it is lower than the 0.9 percent performance for aggregate lenders. The distribution in moderate-income geographies at 15.1 percent is lower than the 20.9 percent of farms in moderate-income geographies and it is lower than the 28.4 percent performance for aggregate lenders.

Dallas-Fort Worth-Arlington, TX MSA

The geographic distribution of small loans to farms in the Dallas-Fort Worth-Arlington, TX MSA is adequate. Performance is very poor in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 0 percent is lower than the 4.5 percent of farms in low-income geographies and it is lower than the 3.1 percent performance for aggregate lenders. The distribution in moderate-income geographies at 12.6 percent is lower than the 17.1 percent of farms in moderate-income geographies and it is slightly lower than the 13.2 percent performance for aggregate lenders.

Houston-The Woodlands-Sugar Land, TX MSA

The geographic distribution of small loans to farms in the Houston-The Woodlands-Sugar Land, TX MSA is good. Performance is excellent in low-income geographies and adequate in moderate-income geographies. The distribution in low-income geographies at 4.1 percent is slightly lower than the 4.4 percent of farms in low-income geographies, but is higher than the 1.6 percent performance for aggregate lenders. The distribution in moderate-income geographies at 13.4 percent is lower than the 18.1 percent of farms in moderate-income geographies and it is lower than the 16.6 percent performance for aggregate lenders.

San Antonio-New Braunfels, TX MSA

The geographic distribution of small loans to businesses in the San Antonio-New Braunfels, TX MSA is excellent. Performance is excellent in low-income geographies and good in moderate-income geographies. The distribution in low-income geographies at 4.8 percent is higher than the 2.6 percent of farms in low-income geographies and it is higher than the 1 percent performance for aggregate lenders. The distribution in moderate-income geographies at 13.8 percent is lower than the 14.3 percent of farms in moderate-income geographies and it is lower than the 15.9 percent performance for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms			Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Austin-Round Rock TX MSA	53	1,180	7.8	328	3.7	0.0	0.9	20.9	15.1	28.4	37.8	43.4	45.7	37.6	41.5	25.0	0.0	0.0	0.0
FS Dallas-Fort Worth-Arlington TX MSA	198	2,178	29.1	1,049	4.5	0.0	3.1	17.1	12.6	13.2	38.2	29.8	55.3	40.2	57.6	28.4	0.0	0.0	0.0
FS Houston-The Woodlands-Sugar Land TX MSA	149	2,073	22.7	740	4.4	4.1	1.6	18.1	13.4	16.6	34.0	26.8	49.1	43.4	57.0	32.7	0.0	0.0	0.0
FS San Antonio-New Braunfels TX MSA	58	750	9.4	309	2.6	4.8	1.0	14.3	13.8	15.9	42.4	37.9	54.7	40.6	46.6	28.5	0.0	0.0	0.0
LS Abilene TX MSA	18	165	2.6	260	0.3	0.0	0.0	13.6	0.0	4.6	55.2	66.7	76.2	30.9	33.3	18.8	0.0	0.0	0.4
LS Amarillo TX MSA	16	204	3.1	518	8.2	16.7	5.2	3.1	28.6	1.0	43.3	43.8	39.8	45.4	31.3	54.1	0.0	0.0	0.0
LS Beaumont-Port Arthur TX MSA	1	27	0.4	75	1.8	0.0	0.0	14.6	0.0	6.7	41.5	0.0	38.7	42.2	100.0	54.7	0.0	0.0	0.0
LS Brownsville-Harlingen TX MSA	4	23	0.9	71	1.0	0.0	0.0	15.4	0.0	11.3	50.5	75.0	66.2	33.2	66.7	22.5	0.0	0.0	0.0
LS College Station-Bryan TX MSA	19	142	2.8	158	3.0	0.0	0.0	19.2	31.6	26.6	46.4	36.8	48.1	31.4	31.6	25.3	0.0	0.0	0.0
LS Corpus Christi TX MSA	32	1,584	4.7	140	6.3	0.0	0.7	13.0	23.8	9.3	45.4	40.6	50.0	35.2	43.8	40.0	0.1	0.0	0.0
LS El Paso TX MSA	13	100	2.8	73	2.8	0.0	0.0	35.7	76.9	28.8	25.3	0.0	32.9	36.0	42.9	38.4	0.1	0.0	0.0
LS Killeen-Temple TX MSA	12	58	1.8	261	1.1	0.0	0.0	10.1	0.0	9.2	63.8	75.0	69.0	24.7	42.9	21.8	0.3	0.0	0.0
LS Laredo TX MSA	1	8	0.5	80	0.6	0.0	0.0	14.2	0.0	12.5	30.9	100.0	17.5	54.3	100.0	70.0	0.0	0.0	0.0
LS Lubbock TX MSA	14	117	2.4	598	1.0	0.0	0.5	12.5	33.3	9.0	45.8	62.5	57.5	40.7	50.0	32.9	0.0	0.0	0.0
LS McAllen-Edinburg-Mission TX MSA	29	646	5.1	150	0.7	0.0	0.7	29.3	31.0	31.3	33.0	37.9	38.0	36.9	37.5	30.0	0.0	0.0	0.0
LS Midland TX MSA	12	113	2.0	55	1.0	0.0	3.6	32.0	50.0	50.9	38.6	55.6	18.2	28.4	33.3	27.3	0.1	0.0	0.0
LS Odessa TX MSA	1	7	0.5	6	0.0	0.0	0.0	7.6	0.0	16.7	49.2	0.0	33.3	43.2	100.0	50.0	0.0	0.0	0.0
LS San Angelo TX MSA	1	15	0.4	82	5.2	0.0	3.7	6.3	0.0	0.0	35.9	0.0	23.2	52.6	100.0	73.2	0.0	0.0	0.0
LS Tyler TX MSA	4	32	0.6	191	2.2	0.0	1.0	19.6	0.0	20.4	45.5	100.0	62.8	32.7	0.0	15.7	0.0	0.0	0.0
LS Victoria TX MSA	6	225	1.3	138	0.4	0.0	0.0	5.9	0.0	1.4	59.6	83.3	65.2	34.2	66.7	33.3	0.0	0.0	0.0
LS Waco TX MSA	19	152	3.3	217	2.0	0.0	0.5	7.4	13.3	5.1	47.8	36.8	73.7	42.6	52.6	20.7	0.2	0.0	0.0
LS Wichita Falls TX MSA	4	41	0.9	76	1.1	0.0	2.6	8.4	0.0	2.6	45.5	66.7	63.2	45.1	75.0	31.6	0.0	0.0	0.0
LS Texas Non-MSA	13	118	2.6	230	0.0	0.0	0.0	1.5	0.0	0.4	59.4	46.2	44.3	39.2	58.3	55.2	0.0	0.0	0.0
Total	681	9,989	100.0	5,805	3.5	1.0	1.6	16.3	15.1	12.5	40.3	35.4	52.7	39.8	48.5	33.2	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the "Inside/Outside Ratio" section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank's distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank's HMDA-reportable loan originations and purchases,

small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is good in the Austin-Round Rock, TX MSA, Dallas-Fort Worth-Arlington, TX MSA, Houston-The Woodlands-Sugar Land, TX MSA, and San Antonio-New Braunfels, TX MSA.

Austin-Round Rock, TX MSA

The distribution of home mortgage loans by borrower income in the Austin-Round Rock, TX MSA is good. The distribution is adequate for low-income borrowers and excellent for moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 8.4 percent is lower than the 21.6 percent of low-income families, but is higher than the 3 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 18.2 percent is higher than the 17.4 percent of moderate-income families and it is higher than the 13.2 percent performance for aggregate lenders.

Dallas-Fort Worth-Arlington, TX MSA

The distribution of home mortgage loans by borrower income in the Dallas-Fort Worth-Arlington, TX MSA is good. The distribution is adequate for low-income borrowers and excellent for moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 7.4 percent is lower than the 22.4 percent of low-income families, but is higher than the 3.1 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 15.9 percent is lower than the 16.9 percent of moderate-income families, but is higher than the 11.3 percent performance for aggregate lenders.

Houston-The Woodlands-Sugar Land, TX MSA

The distribution of home mortgage loans by borrower income in the Houston-The Woodlands-Sugar Land, TX MSA is good. The distribution is adequate for low-income borrowers and excellent for moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 6.9 percent is lower than the 23.7 percent of low-income families, but higher than the 2.4 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 16.9 percent is slightly higher than the 16.5 percent of moderate-income families and it is higher than the 10.6 percent performance for aggregate lenders.

San Antonio-New Braunfels, TX MSA

The distribution of home mortgage loans by borrower income in the San Antonio-New Braunfels, TX MSA is good. The distribution is adequate for low-income borrowers and excellent for moderate-income borrowers. The proportion of the bank's home mortgage loans

to low-income borrowers at 7.7 percent is lower than the 22.5 percent of low-income families, but is higher than the 2.8 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 17.6 percent is slightly higher than the 16.9 percent of moderate-income families and it is higher than the 9.2 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Austin-Round Rock TX MSA	4,591	1,160,988	9.5	89,146	21.6	8.4	3.0	17.4	18.2	13.2	20.0	19.1	19.5	41.0	48.8	48.9	0.0	5.5	15.4
FS Dallas-Fort Worth-Arlington TX MSA	18,159	3,948,283	37.5	261,642	22.4	7.4	3.1	16.9	15.9	11.3	18.8	17.6	17.6	41.8	49.2	48.9	0.0	9.9	19.1
FS Houston-The Woodlands-Sugar Land TX MSA	14,987	3,221,800	30.9	191,261	23.7	6.9	2.4	16.5	16.9	10.6	17.6	20.0	17.5	42.2	51.2	50.8	0.0	5.0	18.7
FS San Antonio-New Braunfels TX MSA	3,815	638,889	7.9	80,065	22.5	7.7	2.8	16.9	17.6	9.2	19.3	21.8	18.7	41.3	42.4	44.4	0.0	10.7	25.0
LS Abilene TX MSA	195	23,084	0.4	5,036	21.2	6.7	2.9	17.4	11.8	11.7	21.2	26.2	19.3	40.2	44.6	39.7	0.0	10.8	26.3
LS Amarillo TX MSA	366	44,130	0.8	8,056	22.5	11.2	5.2	16.6	16.4	12.7	20.4	24.6	18.2	40.5	36.1	39.2	0.0	11.7	24.7
LS Beaumont-Port Arthur TX MSA	312	37,719	0.6	7,553	23.8	8.0	2.3	16.1	16.7	10.5	18.3	26.3	18.8	41.8	41.0	50.1	0.0	8.0	18.4
LS Brownsville-Harlingen TX MSA	405	38,448	0.8	5,164	24.3	6.9	1.5	16.0	26.2	6.2	17.6	20.2	12.0	42.1	40.2	54.9	0.0	6.4	25.5
LS College Station-Bryan TX MSA	281	58,425	0.6	6,444	25.7	4.6	1.9	14.4	10.7	8.0	18.1	18.5	14.3	41.8	60.1	57.5	0.0	6.1	18.3
LS Corpus Christi TX MSA	799	105,759	1.6	11,571	24.5	6.4	2.0	16.3	10.6	8.0	17.8	19.4	18.0	41.3	52.1	46.4	0.0	11.5	25.5
LS El Paso TX MSA	1,077	118,045	2.2	17,278	23.6	9.5	2.7	17.0	18.7	9.9	17.8	21.5	18.0	41.6	39.0	46.4	0.0	11.3	23.1
LS Killeen-Temple TX MSA	638	69,625	1.3	13,886	19.4	9.4	2.7	19.0	21.0	11.4	21.7	18.8	19.8	39.8	29.6	34.1	0.0	21.2	32.1
LS Laredo TX MSA	290	34,272	0.6	4,181	23.6	3.8	1.5	16.1	13.8	8.3	18.0	17.6	15.1	42.3	54.5	44.9	0.0	10.3	30.1
LS Lubbock TX MSA	307	48,122	0.6	9,812	21.2	5.5	3.0	17.9	18.9	10.0	19.2	19.9	15.8	41.6	45.9	42.8	0.0	9.8	28.5
LS McAllen-Edinburg-Mission TX MSA	810	85,347	1.7	9,840	25.3	2.5	1.2	15.5	8.4	5.5	16.8	14.7	11.3	42.4	67.5	54.6	0.0	6.9	27.4
LS Midland TX MSA	188	111,147	0.4	5,845	22.1	5.9	6.0	16.8	11.7	16.8	20.1	28.7	22.8	40.9	47.3	34.0	0.0	6.4	20.4
LS Odessa TX MSA	186	39,390	0.4	3,565	24.4	9.7	3.3	15.7	23.1	12.8	19.2	26.3	21.8	40.7	37.1	34.8	0.0	3.8	27.3
LS San Angelo TX MSA	112	12,603	0.2	3,534	21.9	9.8	4.3	18.4	13.4	12.4	19.4	29.5	19.5	40.4	38.4	40.3	0.0	8.9	23.5
LS Tyler TX MSA	279	44,792	0.6	6,011	21.6	6.8	4.7	17.2	15.4	14.9	19.5	18.3	18.3	41.7	49.5	41.2	0.0	10.0	20.9
LS Victoria TX MSA	82	9,277	0.2	2,194	23.1	9.8	3.1	15.9	11.0	9.8	19.7	25.6	16.6	41.2	41.5	43.7	0.0	12.2	26.8
LS Waco TX MSA	340	42,809	0.7	6,201	22.5	5.3	2.0	17.5	15.9	7.6	19.4	19.7	16.0	40.6	47.4	52.8	0.0	11.8	21.6
LS Wichita Falls TX MSA	91	9,483	0.2	3,837	19.7	12.1	5.2	17.3	24.2	11.3	22.8	19.8	18.4	40.2	22.0	39.1	0.0	22.0	26.1
LS Texas Non-MSA	139	22,165	0.3	2,614	18.1	10.1	2.4	18.2	10.1	9.6	19.4	16.5	16.0	44.3	54.0	50.7	0.0	9.4	21.3
Total	48,449	9,924,602	100.0	754,736	22.9	7.3	2.9	16.8	16.5	10.9	18.6	19.2	17.9	41.7	48.8	48.2	0.0	8.1	20.2

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank's originations/purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good. The distribution is good in the Austin-Round Rock, TX MSA, Dallas-Fort Worth-Arlington, TX MSA, Houston-The Woodlands-Sugar Land, TX MSA, and San Antonio-New Braunfels, TX MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 29 percent of its small loans to businesses.

Austin-Round Rock, TX MSA

The distribution in the Austin-Round Rock, TX MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 59.1 percent is lower than the 77.9 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is stronger than the 41.3 percent for aggregate lenders, overall performance is good.

Dallas-Fort Worth-Arlington, TX MSA

The distribution in the Dallas-Fort Worth-Arlington, TX MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 59.9 percent is lower than the 78.2 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is stronger than the 42.4 percent for aggregate lenders, overall performance is good.

Houston-The Woodlands-Sugar Land, TX MSA

The distribution in the Houston-The Woodlands-Sugar Land, TX MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 62.8 percent is lower than the 78.4 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is stronger than the 40.7 percent for aggregate lenders, overall performance is good.

San Antonio-New Braunfels, TX MSA

The distribution in the San Antonio-New Braunfels, TX MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 56.9 percent is lower than the 77.9 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is stronger than the 40.4 percent for aggregate lenders, overall performance is good.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FS Austin-Round Rock TX MSA	10,052	277,206	10.3	52,714	77.9	59.1	41.3	4.0	10.4	18.1	30.5
FS Dallas-Fort Worth-Arlington TX MSA	37,561	965,288	38.6	169,819	78.2	59.9	42.4	4.4	10.5	17.4	29.6
FS Houston-The Woodlands-Sugar Land TX MSA	31,121	858,535	32.0	154,577	78.4	62.8	40.7	4.8	11.7	16.8	25.5
FS San Antonio-New Braunfels TX MSA	6,773	171,449	7.0	41,872	77.9	56.9	40.4	4.2	11.6	18.0	31.5
LS Abilene TX MSA	362	6,123	0.4	2,876	75.8	59.1	33.6	4.6	8.0	19.7	32.9
LS Amarillo TX MSA	492	9,497	0.5	5,110	77.0	54.7	45.6	4.4	9.6	18.6	35.8
LS Beaumont-Port Arthur TX MSA	552	14,169	0.6	6,075	76.0	49.6	40.8	4.4	16.1	19.6	34.2
LS Brownsville-Harlingen TX MSA	426	6,507	0.4	5,783	74.7	62.0	39.7	4.0	10.1	21.2	27.9
LS College Station-Bryan TX MSA	492	14,094	0.5	3,945	75.8	55.5	42.6	4.1	13.4	20.1	31.1
LS Corpus Christi TX MSA	1,058	24,241	1.1	7,302	75.0	55.4	38.3	4.4	12.1	20.6	32.5
LS El Paso TX MSA	2,206	51,147	2.3	12,304	75.6	60.6	39.1	4.4	14.4	20.0	25.0
LS Killeen-Temple TX MSA	685	16,381	0.7	4,194	78.4	63.5	46.1	3.1	9.1	18.5	27.4
LS Laredo TX MSA	516	9,489	0.5	5,501	74.5	55.0	45.3	5.5	12.6	20.0	32.4
LS Lubbock TX MSA	460	8,449	0.5	5,968	76.6	53.0	39.3	4.3	9.8	19.1	37.2
LS McAllen-Edinburg-Mission TX MSA	1,572	31,007	1.6	12,024	77.0	60.1	38.0	3.6	13.2	19.4	26.7
LS Midland TX MSA	476	6,924	0.5	3,159	74.3	55.0	30.9	6.1	11.1	19.7	33.8
LS Odessa TX MSA	339	7,729	0.3	2,415	74.5	53.4	27.0	6.2	15.0	19.3	31.6
LS San Angelo TX MSA	331	6,653	0.3	1,615	75.3	54.4	39.3	4.4	8.8	20.3	36.9
LS Tyler TX MSA	643	17,574	0.7	4,774	78.2	51.0	44.2	4.6	12.6	17.2	36.4
LS Victoria TX MSA	183	2,311	0.2	1,798	74.8	53.0	37.3	4.3	17.5	20.9	29.5
LS Waco TX MSA	506	11,398	0.5	3,300	76.1	51.4	38.9	4.8	11.3	19.1	37.4
LS Wichita Falls TX MSA	233	7,617	0.2	1,696	76.0	56.2	39.9	4.9	16.3	19.0	27.5
LS Texas Non-MSA	340	6,086	0.3	2,490	79.5	49.4	44.5	3.5	9.4	17.0	41.2
Total	97,379	2,529,874	100.0	511,311	77.8	60.2	41.2	4.5	11.2	17.8	28.7

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations/purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is good. The distribution is good in the Austin-Round Rock, TX MSA, in the Dallas-Fort Worth-Arlington, TX MSA, Houston-The Woodlands-Sugar Land, TX MSA, and in the San Antonio-New Braunfels, TX MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 39 percent of its small loans to farms.

Austin-Round Rock, TX MSA

The distribution in the Austin-Round Rock, TX MSA is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 56.6 percent is lower than the 96.7 percent of farms with gross annual revenues of \$1 million or less. The distribution was also less than the 61.9 percent performance for aggregate lenders.

Dallas-Fort Worth-Arlington, TX MSA

The distribution in the Dallas-Fort Worth-Arlington, TX MSA is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 59.1 percent is lower than the 96 percent of farms with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 51.4 percent for aggregate lenders, overall performance is good.

Houston-The Woodlands-Sugar Land, TX MSA

The distribution in the Houston-The Woodlands-Sugar Land, TX MSA is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 67.8 percent is lower than the 96.1 percent of farms with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 54.2 percent for aggregate lenders, overall performance is good.

San Antonio-New Braunfels, TX MSA

The distribution in the San Antonio-New Braunfels, TX MSA is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 51.7 percent is lower than the 96.8 percent of farms with gross annual revenues of \$1 million or less. The distribution was also lower than the 54.4 percent performance for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Austin-Round Rock TX MSA	53	1,180	8.8	328	96.7	56.6	61.9	2.0	4.5	1.4	41.5
FS Dallas-Fort Worth-Arlington TX MSA	198	2,178	29.9	1,049	96.0	59.1	51.4	2.3	1.5	1.7	39.9
FS Houston-The Woodlands-Sugar Land TX MSA	149	2,073	22.5	740	96.1	67.8	54.2	2.3	4.0	1.6	28.2
FS San Antonio-New Braunfels TX MSA	58	750	8.5	309	96.8	51.7	54.4	1.9	10.8	1.3	41.4
LS Abilene TX MSA	18	165	2.6	260	98.2	61.1	59.2	1.5	0.0	0.3	38.9
LS Amarillo TX MSA	16	204	2.5	518	96.2	50.0	72.2	2.6	16.7	1.2	37.5
LS Beaumont-Port Arthur TX MSA	1	27	0.4	75	98.7	100.0	70.7	0.5	0.0	0.8	0.0
LS Brownsville-Harlingen TX MSA	5	30	0.7	71	95.8	100.0	31.0	2.2	0.0	2.0	0.0
LS College Station-Bryan TX MSA	19	142	2.8	158	96.5	42.1	65.2	1.3	33.3	2.2	47.4
LS Corpus Christi TX MSA	32	1,584	4.7	140	97.4	46.9	42.9	1.2	9.4	1.5	43.8
LS El Paso TX MSA	13	100	2.5	73	94.0	50.0	31.5	4.1	0.0	1.9	53.8
LS Killeen-Temple TX MSA	12	58	1.8	261	98.5	66.7	52.9	0.8	0.0	0.7	33.3
LS Laredo TX MSA	2	15	0.5	80	96.0	100.0	71.3	2.1	0.0	1.9	100.0
LS Lubbock TX MSA	14	117	2.1	598	96.8	50.0	54.7	2.0	0.0	1.2	50.0
LS McAllen-Edinburg-Mission TX MSA	29	646	5.8	150	94.1	17.2	30.7	4.6	20.8	1.2	65.5
LS Midland TX MSA	12	113	1.8	55	98.6	66.7	34.5	1.1	0.0	0.3	33.3
LS Odessa TX MSA	1	7	0.5	6	97.5	100.0	16.7	0.7	0.0	1.8	0.0
LS San Angelo TX MSA	1	15	0.4	82	97.6	100.0	48.8	1.7	0.0	0.7	0.0
LS Tyler TX MSA	4	32	0.7	191	96.6	66.7	67.0	2.1	0.0	1.3	66.7
LS Victoria TX MSA	7	235	1.6	138	98.7	57.1	66.7	0.8	0.0	0.6	50.0
LS Waco TX MSA	19	152	2.8	217	98.3	47.4	47.5	0.8	0.0	0.9	52.6
LS Wichita Falls TX MSA	5	48	0.9	76	98.1	100.0	51.3	0.7	0.0	1.2	100.0
LS Texas Non-MSA	13	118	2.6	230	96.7	76.9	51.3	2.0	0.0	1.3	25.0
Total	681	9,989	100.0	5,805	96.5	57.6	55.3	2.1	3.7	1.4	38.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a neutral effect overall on the bank's Lending Test performance in the state of Texas.

Austin-Round Rock, TX MSA

In the Austin-Round Rock, TX MSA, CD lending has a significantly positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated 17 CD loans totaling \$112 million that helped provide over 1,900 units of affordable housing. CD lending represents 11.6 percent of the allocated Tier 1 Capital.

Examples of CD loans include:

- The bank purchased a \$21.9 million tax-exempt bond, secured by a certificate of deposit held at the bank, to finance the construction of The Pointe at Ben White, a 250-unit affordable multifamily housing project complex in Austin, TX. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$8 million in construction financing to develop Lakeline Station, a 128-unit affordable apartment complex in Austin, TX. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$30.2 million construction financing to develop Terrace at Walnut Creek Apartments, a 324-unit affordable multifamily housing complex in Austin, TX. All units are restricted to incomes at or below 60 percent of the area median income.

Dallas-Fort Worth-Arlington, TX MSA

In the Dallas-Fort Worth-Arlington, TX MSA, CD lending has a neutral effect on the lending performance in the assessment area. The bank originated 35 CD loans totaling \$344.5 million that primarily support affordable housing, economic development, and community services. CD loans helped to finance the development of more than 2,800 units of affordable housing. CD lending represents 4.5 percent of the allocated Tier 1 Capital, after considering the effect of \$9.8 billion in non-local deposits. The bank met the community's credit needs primarily through retail lending.

Examples of CD loans include:

- The bank provided \$15.9 million in construction financing to develop 1400 Belleview Apartments, a 164-unit LIHTC multifamily housing project in Dallas, TX. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$8.5 million in construction financing to develop Bishop Gardens Apartments, a 72-unit multifamily mixed-income housing project in Justin, TX with 60 units restricted to incomes at or below 60 percent of the area median income.

- The bank provided \$8 million in construction financing to develop Bruton Apartments, a 264-unit affordable housing project. All units are restricted to incomes at or below 60 percent of the area median income.

Houston-The Woodlands-Sugar Land, TX MSA

In the Houston-The Woodlands-Sugar Land, TX MSA, CD lending has a positive effect on the lending performance in the assessment area. The bank originated 37 CD loans totaling \$234.2 million that primarily supported affordable housing and economic development. CD loans helped to finance the development of nearly 3,000 units of affordable housing. CD lending represents 9.1 percent of the allocated Tier 1 Capital.

Examples of CD loans include:

- The bank provided \$16 million in construction financing to develop AT Villages at Cypress, a 162-unit mixed income housing development in Houston, TX. The project will include 142 units restricted to incomes at or below 60 percent of the area median income. In addition, the project has set aside eight units for tenants with special needs, such as drug addictions, persons with disabilities, victims of domestic violence, persons living with HIV/AIDS, or migrant farm workers.
- The bank provided \$9.6 million in acquisition and reposition financing for Cleme Manor Apartments, an existing 284-unit multifamily housing complex in Houston, TX. All units are restricted to incomes at or below 80 percent of the area median income.
- The bank provided \$6.5 million in refinancing for Tall Timbers Apartments, an existing 148-unit affordable housing complex in Conroe, TX. All units are restricted to incomes at or below 60 percent of the area median income.

San Antonio-New Braunfels, TX MSA

In the San Antonio-New Braunfels, TX MSA, CD lending has a significantly positive effect on the lending performance in the assessment area. The bank originated 9 CD loans totaling \$60.7 million that primarily supported affordable housing and community services. CD loans helped to finance the development of nearly 500 units of affordable housing. CD lending represents 12.8 percent of the allocated Tier 1 Capital.

Examples of CD loans include:

- The bank provided \$10.2 million in construction financing to develop Phase II of Sutton Homes, a 208-unit LIHTC affordable multifamily development in San Antonio, TX. The project includes 162 units that are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$20.7 million in financing to construct the new 160,000 square foot Cevallos Campus of a KIPP San Antonio public charter school in San Antonio, TX. The school provides an academically challenging education to low-income children in San

Antonio. The campus will serve approximately 1,350 students from three nearby schools. During the 2013-2014 school year, approximately 85 percent of the students from the three schools were qualified to receive free and reduced lunches.

- The bank provided \$18.6 million in construction financing to develop Palo Alto Apartments, a 322-unit affordable multifamily housing project in San Antonio, TX. All units are restricted to incomes at or below 60 percent of the area median income.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Texas, lending under the MHA and HARP programs accounted for 77 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance varied across the limited-scope assessment areas. Performance in the Beaumont-Port Arthur, TX MSA, El Paso, TX MSA, Laredo, TX MSA, Midland, TX MSA, and Odessa, TX MSA is consistent with the Outstanding Lending Test performance in the state of Texas. Performance in the Abilene, TX MSA, Amarillo, TX MSA, Brownsville-Port Arthur, TX MSA, College Station-Bryan, TX MSA, Corpus Christi, TX, MSA, Killeen-Temple, TX MSA, Lubbock, TX MSA, McAllen-Edinburg-Mission, TX MSA, San Angelo, TX MSA, Victoria, TX MSA, Waco, TX MSA, Wichita Falls, TX MSA, and Texas Non-MSA is weaker than the overall Outstanding Lending Test performance in the state of Texas primarily due to weaker lending activity or limited levels of CD lending.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Texas is rated Outstanding. The performance is excellent in the Austin-Round Rock, TX MSA, Dallas-Fort Worth-Arlington, TX MSA, Houston-The Woodlands-Sugarland MSA, and San Antonio-New Braunfels, TX MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Austin-Round Rock, TX MSA

In the Austin-Round Rock, TX MSA, the bank has an excellent level of community development investments. The bank made 109 community development investments during

the current evaluation period totaling \$89.8 million. Approximately \$88.5 million or 99 percent of the investment dollars supported more than 2,000 units of affordable housing. In addition, the bank has 28 CD investments totaling \$19.8 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior and current period investments total \$109.6 million or 11.4 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$75 million or 84 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$13.3 million in LIHTCs to finance the construction of Homestead Apartments, a 140-unit mixed income multifamily housing development in Austin, TX. The project will have 126 units restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$7.8 million in LIHTCs to finance the construction of Liberty Manor Apartments, a 68-unit development for seniors, in Liberty Hill, TX. The project will have 65 units restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$21.8 million in LIHTCs to finance the construction of Manor Apartments, a 324-unit affordable housing project in Austin, TX. All units are restricted to incomes at or below 60 percent of the area median income.

Dallas-Fort Worth-Arlington, TX MSA

In the Dallas-Fort Worth-Arlington, TX MSA, the bank has an excellent level of community development investments. The bank made 673 community development investments during the current evaluation period totaling \$683.9 million. Approximately \$674 million or 99 percent of the investment dollars supported nearly 10,000 units of affordable housing. In addition, the bank has 432 CD investments totaling \$130 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior and current period investments total \$813.9 million or 10.5 percent of the bank's adjusted Tier 1 Capital allocated to the assessment area. Examiners adjusted the allocated Tier 1 Capital to minimize the effect of \$9.8 billion in deposits received from outside of the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$422.3 million or 62 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$16.3 million in LIHTCs to finance the construction of 1400 Belleview, a 164-unit multifamily housing project located in Dallas, TX. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$8.2 million in LIHTCs to finance the construction of Bishop Gardens, a 72-unit mixed-income housing development located in Justin, TX. The project will include 60 units that are restricted to incomes at or below 60 percent of the area median income.

- The bank invested \$15.5 million in LIHTCs to finance the construction of Bruton Apartments, a 264-unit multifamily housing development in Dallas, TX. All units are restricted to incomes at or below 60 percent of the area median income.

Houston-The Woodlands-Sugar Land, TX MSA

In the Houston-The Woodlands-Sugar Land, TX MSA, the bank has an excellent level of community development investments. The bank made 346 community development investments during the current evaluation period totaling \$269.5 million. Approximately \$262.6 million or 97 percent of the investment dollars supported more than 6,700 units of affordable housing. In addition, the bank has 81 CD investments totaling \$50 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior and current period investments total \$319.5 million or 12.4 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$156.7 million or 58 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$15.6 million in LIHTCs to finance the construction of AT Villages at Cypress, a 162-unit mixed-income housing development in Houston, TX. The project will have 146 units that are restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$9.6 million in LIHTCs to finance the construction of Campanile at Jones Creek, a 77-unit affordable housing complex located in Richmond, TX. The project has 72 units that are restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$14.7 million in LIHTCs to finance the construction of El Dorado Green Apartments, a 108-unit mixed income housing development for seniors. The housing development, located in Houston, TX, has 88 units that are restricted to incomes at or below 60 percent of the area median income.

San Antonio-New Braunfels, TX MSA

In the San Antonio-New Braunfels, TX MSA, the bank has an excellent level of community development investments. The bank made 100 community development investments during the current evaluation period totaling \$45.7 million. Approximately \$41.1 million or 90 percent of the investment dollars supported nearly 1,500 units of affordable housing. In addition, the bank has 25 CD investments totaling \$10.7 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior and current period investments total \$56.4 million or 11.9 percent of the bank's Tier 1 Capital allocated to the assessment area. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$39.5 million or 86 percent of the investment dollars.

Examples of community development investments include:

- The bank invested \$1.2 million in LIHTCs as part of a joint venture's direct and indirect investments in partnerships that own affordable rental housing projects across multiple states. The \$1.2 million represents the portion of financing for projects located within the San Antonio-New Braunfels, TX MSA. The investment financed 252 units of affordable rental housing.
- The bank made a \$2 million LIHTC equity investment in a Section 42 LIHTC Fund, which invests indirectly in a portfolio of 11 LIHTC properties. This investment represents the portion of financing for the Artisan at Willow Springs, a newly constructed 248-unit rental property in San Antonio. All units are restricted to incomes at or below 60 percent of the area median income.
- The bank invested \$15.6 million in LIHTCs for the development of Palo Alto Apartments, a 322-unit multifamily affordable housing project in San Antonio. All units are restricted to incomes at or below 60 percent of the area median income.

QUALIFIED INVESTMENTS		Geography: TEXAS				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Austin, TX	28	19,771	109	89,788	137	109,559	7.37	4	33,452	
Dallas, TX	432	129,956	673	683,903	1,105	813,859	54.73	12	71,636	
Houston, TX	81	50,037	346	269,502	427	319,539	21.49	9	32,303	
San Antonio, TX	25	10,658	100	45,717	125	56,375	3.79	2	4,736	
Limited Review										
Abilene, TX	6	1,071	15	623	21	1,695	0.11	0	0	
Amarillo, TX	5	164	33	1,924	38	2,089	0.14	0	0	
Beaumont, TX	19	4,498	19	28,182	38	32,680	2.20	1	8,530	
Brownsville, TX	4	1,297	16	448	20	1,745	0.12	0	0	
College Station, TX	5	77	25	1,503	30	1,580	0.11	0	0	
Corpus Christi, TX	7	3,632	30	2,433	37	6,064	0.41	0	0	
El Paso, TX	20	11,239	25	45,924	45	57,163	3.84	5	10,776	
Killeen, TX	4	224	20	1,008	24	1,232	0.08	0	0	
Laredo, TX	2	12,087	15	398	17	12,485	0.84	0	0	
Lubbock, TX	9	236	18	1,172	27	1,409	0.09	0	0	
McAllen, TX	13	823	27	1,387	40	2,211	0.15	0	0	
Midland, TX	9	350	15	11,369	24	11,719	0.79	0	0	
Odessa, TX	4	61	13	8,519	17	8,580	0.58	1	2,934	
San Angelo, TX	3	575	9	448	12	1,023	0.07	0	0	
Tyler, TX	5	115	30	4,402	35	4,517	0.30	0	0	
Victoria, TX	2	56	20	337	22	393	0.03	0	0	
Waco, TX	6	5,696	33	1,355	39	7,051	0.47	0	0	
Wichita Falls, TX	3	396	18	909	21	1,305	0.09	0	0	
Texas Non-MSA	2	731	15	7,817	17	8,548	0.57	1	1,043	
TEXAS - Statewide	0	0	31	450	31	450	0.03	0	0	
TEXAS - Non Assessed	50	8,107	110	15,697	160	23,805	1.60	1	367	
TEXAS	744	261,858	1,765	1,225,216	2,509	1,487,074	100.00	36	165,777	

(*) '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 bank's financial reporting system.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance varied across the limited-scope assessment areas. Performance in Beaumont-Port Arthur, TX MSA, El Paso, TX MSA, Laredo, TX MSA, Midland, TX MSA, Odessa, TX MSA, Waco, TX MSA, and Texas Non-MSA is consistent with the Outstanding Investment Test performance in the state of Texas. Performance in the Abilene, TX MSA, Amarillo, TX MSA, Brownsville-Harlingen, TX MSA, College Station-Bryan, TX MSA, Corpus Christi, TX MSA, Killeen-Temple, TX MSA, Lubbock, TX MSA, McAllen-Edinburg-Mission, TX MSA, San Angelo, TX MSA, Tyler, TX MSA, Victoria, TX MSA, and Wichita Falls, TX MSA is weaker than the Outstanding Investment Test performance in the state of Texas due to lower levels of investments relative to the bank's capacity in those assessment areas.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Texas is rated High Satisfactory. Service Test performance is good in the Austin-Round Rock, TX MSA, excellent in the Dallas-Fort Worth-Arlington, TX MSA, excellent in the Houston-The Woodlands-Sugar Land, TX MSA, and good in the San Antonio-New Braunfels, TX MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Austin-Round Rock, TX MSA

In the Austin-Round Rock, TX MSA, the bank's service delivery systems are accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's 36 financial centers with the distribution of the population along with accessibility provided through alternative delivery systems. The bank has two financial centers in low-income geographies representing 5.6 percent of its financial centers. Low-income geographies have 10.7 percent of the assessment area's population. In middle-income geographies, the bank has five or 13.9 percent of its financial centers compared with 23.9 percent of the population.

Examiners considered the bank's alternative delivery systems, including cash dispensing and full-service ATMs, telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Alternative delivery systems have a significantly positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customers' residency. In five of the six ADS platforms, the percentage of customers in low- and moderate-income geographies using those platforms exceed 70 percent of the proportion of individuals residing in low- and moderate-income geographies.

The bank has six financial centers located in middle- and upper-income geographies that are adjacent to or in very close proximity to moderate-income geographies. These adjacent financial centers help improve accessibility of retail banking services in moderate-income geographies.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center in a middle-income geography and closed five financial centers. The bank closed one financial center in a low-income geography, one in a moderate-income geography, and the remaining three in upper-income geographies. Despite the closures, financial centers remain accessible to individuals and geographies of different income levels.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial centers are open 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Austin-Round Rock TX MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	36	10.3	184,408	10.7	2	5.6	15	14.0	0	0.0	1	20.0
Moderate	86	24.6	409,855	23.9	5	13.9	16	15.0	0	0.0	1	20.0
Middle	123	35.1	597,828	34.8	13	36.1	36	33.6	1	100.0	0	0.0
Upper	102	29.1	521,870	30.4	16	44.4	40	37.4	0	0.0	3	60.0
NA	3	0.9	2,328	0.1	0	0.0	0	0.0	0	0.0	0	0.0
Totals	350	100.0	1,716,289	100.0	36	100.0	107	100.0	1	100.0	5	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Dallas-Fort Worth-Arlington, TX MSA

In the Dallas-Fort Worth-Arlington, TX MSA, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 145 financial centers with the distribution of the population along with accessibility provided through alternative delivery systems. The bank has 16 financial centers in low-income geographies representing 11 percent of its financial centers. Low-income geographies have 9.6 percent of the assessment area’s population. In middle-income geographies, the bank has 24 or 16.6 percent of its financial centers compared with 24.7 percent of the population.

Examiners considered the bank’s alternative delivery systems, including cash dispensing and full-service ATMs, telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customers’ residency. In all six ADS platforms, the percentages of customers

in low- and moderate-income geographies using those platforms exceed 70 percent of the proportion of individuals residing in low- and moderate-income geographies.

The bank has 30 financial centers located in middle- and upper-income geographies that are adjacent to or in very close proximity to low- and moderate-income geographies. These adjacent financial centers help improve accessibility of retail banking services in low- and moderate-income geographies.

Financial center openings and closings did adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened eight financial centers and closed nineteen. The bank closed two financial centers in low-income geographies, eight in moderate-income geographies, and the remaining nine in middle- and upper-income geographies.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial centers are open 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Dallas-Fort Worth-Arlington TX MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	150	11.3	618,423	9.6	16	11.0	61	10.9	0	0.0	2	10.5
Moderate	337	25.5	1,585,724	24.7	24	16.6	102	18.2	1	12.5	8	42.1
Middle	404	30.5	2,067,344	32.2	42	29.0	182	32.5	1	12.5	3	15.8
Upper	429	32.4	2,154,623	33.5	63	43.4	215	38.4	6	75.0	6	31.6
NA	4	0.3	100	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	1,324	100.0	6,426,214	100.0	145	100.0	560	100.0	8	100.0	19	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Houston-The Woodlands-Sugar Land, TX MSA

In the Houston-The Woodlands-Sugar Land, TX MSA, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 113 financial centers with the distribution of the population along with accessibility provided through alternative delivery systems. The bank has 11 financial centers in low-income geographies representing 9.7 percent of its financial centers. Low-income geographies have 9.3 percent of the assessment area’s population. In middle-income geographies, the bank has 24 or 21.2 percent of its financial centers compared with 26 percent of the population.

Examiners considered alternative delivery systems, including ATMs, telephone banking, online banking, and mobile banking in evaluating accessibility to the bank’s products and services. The effect of ADS based on customer usage was neutral.

The bank has 13 financial centers located in middle- and upper-income geographies that are adjacent to or in very close proximity to low- and moderate-income geographies. These adjacent financial centers help improve accessibility of retail banking services in low- and moderate-income geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened 11 financial centers and closed 15. The bank closed two financial centers in low-income geographies, six in moderate-income geographies, and the remaining seven in middle- and upper-income geographies. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial centers are open 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Houston-The Woodlands-Sugar Land TX MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	131	12.3	552,207	9.3	11	9.7	49	11.4	1	9.1	2	13.3
Moderate	306	28.6	1,540,950	26.0	24	21.2	103	24.0	1	9.1	6	40.0
Middle	289	27.0	1,717,127	29.0	19	16.8	70	16.3	0	0.0	2	13.3
Upper	337	31.5	2,090,027	35.3	59	52.2	207	48.1	9	81.8	5	33.3
NA	6	0.6	20,105	0.3	0	0.0	1	0.2	0	0.0	0	0.0
Totals	1,069	100.0	5,920,416	100.0	113	100.0	430	100.0	11	100.0	15	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

San Antonio-New Braunfels, TX MSA

In the San Antonio-New Braunfels, TX MSA, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 31 financial centers with the distribution of the population along with accessibility provided through alternative delivery systems. The bank has one financial center in a low-income geography representing 3.2 percent of its financial centers. Low-income geographies have 6.4 percent of the assessment area’s population. In middle-income geographies, the bank has seven or 22.6 percent of its financial centers compared with 28.1 percent of the population.

Examiners considered the bank’s alternative delivery systems, including cash dispensing and full-service ATMs, telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The bank demonstrated customer usage of ADS through income proxies based on customers’ residency. In all six ADS platforms, the percentages of customers

in low- and moderate-income geographies using those platforms exceed 70 percent of the proportion of individuals residing in low- and moderate-income geographies.

The bank has 10 financial centers located in middle- and upper-income geographies that are adjacent to or in very close proximity to low- and moderate-income geographies. These adjacent financial centers help improve accessibility of retail banking services in low- and moderate-income geographies.

Financial center openings and closings did adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened two financial centers and closed eleven. The bank closed two financial centers in low-income geographies, three in moderate-income geographies, four in middle-income geographies, and two in upper-income geographies.

Banking products, services, and hours of operation do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies, and to low- and moderate-income individuals. The bank offers a full range of products and services. Banking hours are generally consistent throughout the assessment area. Financial centers are open 9:00 am to 4:00 pm Monday through Thursday, 9:00 am to 6:00 pm on Friday, and 9:00 am to 1:00 pm on Saturday.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS San Antonio-New Braunfels TX MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	37	8.1	137,138	6.4	1	3.2	8	7.0	0	0.0	2	18.2
Moderate	127	27.8	601,059	28.1	7	22.6	27	23.7	0	0.0	3	27.3
Middle	151	33.0	729,538	34.1	11	35.5	37	32.5	1	50.0	4	36.4
Upper	138	30.2	674,740	31.5	12	38.7	42	36.8	1	50.0	2	18.2
NA	4	0.9	33	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	457	100.0	2,142,508	100.0	31	100.0	114	100.0	2	100.0	11	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Austin-Round Rock, TX MSA

In the Austin-Round Rock, TX MSA, the bank is a leader in providing community development services. During the evaluation period, the bank participated with community development organizations to provide 106 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 21 low- and moderate-income individuals, and provided 15 financial education workshops and 1 foreclosure prevention workshop for 254 individuals. Fifteen employees served as financial coaches to work one-on-one with low- and moderate-income individuals to provide financial counseling. Employees participated in 21 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 24 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Dallas-Fort Worth-Arlington, TX MSA

In the Dallas-Fort Worth-Arlington, TX MSA, the bank is a leader in providing community development services. During the evaluation period, the bank participated with community development organizations to provide 81 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 138 low- and moderate-income individuals, and provided 54 financial education workshops and 2 foreclosure prevention workshops for 1,331 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 58 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 18 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Houston-The Woodlands-Sugar Land, TX MSA

In the Houston-The Woodlands-Sugar Land, TX MSA, the bank is a leader in providing community development services. During the evaluation period, the bank participated with community development organizations to provide 233 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 130 low- and moderate-income individuals, and provided 15 financial education workshops and 9 foreclosure prevention workshops for 716 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 49 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 22 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

San Antonio-New Braunfels, TX MSA

In the San Antonio-New Braunfels, TX MSA, the bank provides a high level of community development services. During the evaluation period, the bank participated with community development organizations to provide 108 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 76 low- and moderate-income individuals, and provided 14 financial education workshops for 233 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 18 webinars and workshops with non-profit organizations to help the organizations with capacity building. No employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance varied across the limited-scope assessment areas. Performance in the Abilene, TX MSA, Amarillo, TX MSA, Beaumont-Port Arthur, TX MSA, Brownsville-Harlingen, TX MSA, College Station-Bryan, TX MSA, Lubbock, TX MSA, McAllen-Edinburg-Mission, TX MSA, Midland, TX MSA, Wichita Falls, TX MSA, and Texas Non-MSA is consistent with the Outstanding Service Test performance in the state of Texas. Performance

in the Corpus Christi, TX MSA, El Paso, TX MSA, Killeen-Temple, TX MSA, Laredo, TX MSA, Odessa, TX MSA, San Angelo, TX MSA, Tyler, TX MSA, Victoria, TX MSA, and Waco, TX MSA is weaker than the overall Outstanding Service Test performance in the state of Texas primarily due to weaker distribution of financial centers. Although the bank's presence in many of the limited-scope assessment areas was very limited and often comprised just one or two financial centers, at least one of those financial centers was generally located in a low- or moderate-income geography.

State of Virginia

CRA Rating for Virginia⁴⁵: **Outstanding**
The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Good distribution of loans by geography and excellent distribution of loans by borrower income or business revenue size;
- High level of CD lending that has a significantly positive effect on overall lending performance;
- Excellent level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Virginia

The state of Virginia is Bank of America's 14th largest rating area based on its total deposits in the state when excluding deposits in the Washington-Arlington-Alexandria, DC-VA-MD Multistate MSA. Examiners excluded the multistate MSA from the analysis of the state of Virginia because examiners evaluated the multistate MSA as a separate rating area. As of June 30, 2016, the bank maintained approximately \$16.7 billion or 1.4 percent of its total domestic deposits in financial centers in areas of the state of Virginia that do not include the multistate MSA. Of the 106 depository financial institutions operating in the areas of the state that do not include the multistate MSA, Bank of America, with a deposit market share of 10.2 percent, is the third largest. The largest depository financial institution in the state is Capital One Bank with 1 branch and \$62.2 billion in deposits or 21.7 percent market share. Wells Fargo is the state's second largest depository financial institution with 290 branches and \$38.6 billion in deposits or 13.5 percent market share. E*Trade Bank is the third largest depository financial institution with two branches and \$33.2 billion in deposits or 11.6 percent market share. As of December 31, 2016, the bank operated 72 financial centers and 171 deposit-taking ATMs in the areas of the state that do not include the multistate MSA.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In

⁴⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

the Richmond, VA MSA, Bank of America reported \$2 billion in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

Refer to the community profiles for the state of Virginia in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Virginia

Examiners selected two assessment areas for full-scope reviews and the remaining five assessment areas for limited-scope reviews. The full-scope assessment areas selected are the Charlottesville, VA MSA and Richmond, VA MSA. While the Richmond, VA MSA carries approximately 74 percent weight of the overall conclusions based on the bank's presence in the assessment area relative to all assessment areas in Virginia, the conclusions and ratings for the state are based on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 23,617 home mortgage loans totaling \$4.8 billion, 20,906 small loans to businesses totaling \$605.6 million, 262 small loans to farms totaling \$4 million, and 42 CD loans totaling \$264 million. Lending volumes include loans originated or purchased in the Danville, VA MSA and Roanoke, VA MSA, which the bank no longer designates as assessment areas due to the bank's closure or sale of all financial centers and deposit-taking ATMs in those communities. Based on loan volume, examiners weighted home mortgage loans, representing 52.7 percent of the volume, the heaviest, followed by small loans to businesses (46.7 percent) and small loans to farms (0.6 percent).

The bank did not originate or purchase sufficient volumes of small loans to farms in the Blacksburg, VA MSA, Harrisonburg, VA MSA, and Lynchburg, VA MSA to provide any meaningful analyses.

The OCC interviewed two local housing based organizations. The organizations identified affordable housing, as the most pressing community development need.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Virginia is rated Outstanding, based on excellent lending activity, good geographic distribution, excellent borrower income distribution, and high levels of CD lending that have a significantly positive effect on overall Lending Test performance. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Virginia is excellent. Lending activity is excellent in each of the full-scope assessment areas and it is generally consistent across the limited-scope assessment areas.

Charlottesville, VA MSA

Lending activity in the Charlottesville, VA MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 21.3 percent. The bank ranks first among 18 depository financial institutions in the assessment area, which places it in the top 6 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 3 percent based on the number of home mortgage loans originated or purchased. The bank ranks eighth among 351 home mortgage lenders, which places it in the top 3 percent of lenders competing for loans. According to peer small business data for 2016, the bank has an 8.8 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks fifth among 83 small business lenders, which places it in the top 7 percent of lenders in the MSA. According to peer farm data for 2016, the bank has a market share of 10.8 percent based on the number of small loans to farms originated or purchased. The bank ranks fifth among 13 farm lenders, which places it in the top 39 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans relative to its ranking for deposits and the greater weight placed on home mortgage lending, overall lending activity is excellent.

Richmond, VA MSA

Lending activity in the Richmond, VA MSA is excellent. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 12.7 percent. The bank ranks second among 36 depository financial institutions in the assessment area, which places it in the top 6 percent of institutions in the MSA. According to peer mortgage data for 2016, the bank has a market share of 1.7 percent based on the number of home mortgage loans originated or purchased. The bank ranks 16th among 546 home mortgage lenders, which places it in the top 3 percent of lenders. According to peer small business data for 2016, the bank has a 5.6 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks sixth among 117 small business lenders, which places it in the top 6 percent of lenders. For small loans to farms, the bank has a market share of 4.6 percent based on the number of small loans to farms originated or purchased. The bank ranks seventh among 16 farm lenders, which places it in the top 44 percent of lenders. Considering the bank's deposits and deposit market share include \$2 billion in deposits not derived from the MSA along with the higher ranking for home mortgage loans and similar ranking for small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: VIRGINIA						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Charlottesville, VA	7.90	1,607	411,698	1,895	39,913	39	327	1	6,530	3,542	458,468	5.74
Richmond, VA	33.87	7,790	1,564,274	7,321	262,935	56	511	17	139,582	15,184	1,967,302	73.79
Limited Review												
Blacksburg, VA	2.03	496	78,576	404	8,873	10	60	2	1,470	912	88,979	0.00
Danville, VA	0.70	179	20,174	134	4,086	1	3	0	0	314	24,263	0.00
Harrisonburg, VA	1.68	332	51,270	405	7,060	14	86	0	0	751	58,416	1.12
Lynchburg, VA	4.26	966	142,798	926	22,013	14	158	1	5,550	1,909	170,519	1.38
Roanoke, VA	3.36	984	165,689	511	11,288	8	40	1	2,280	1,504	179,297	0.00
Virginia Beach, VA	41.10	10,026	2,144,844	8,311	220,442	69	675	17	97,975	18,423	2,463,936	17.10
Virginia Non-MSA	5.10	1,237	190,159	997	28,994	51	2,185	3	10,998	2,288	232,336	0.87
VIRGINIA	100.00	23,617	4,769,482	20,906	605,604	262	4,045	42	264,386	44,827	5,643,517	100.00
(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area.												
(**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016.												
(***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.												

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects excellent penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is good in the Charlottesville, VA MSA and Richmond, VA MSA.

Charlottesville, VA MSA

The geographic distribution of home mortgage loans in the Charlottesville, VA MSA is good. Performance is excellent in low-income geographies, but poor in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at 2.6 percent is higher than the 2.2 percent of owner-occupied housing units in low-income geographies and it is higher than the 1.7 percent for aggregate lenders. However, the distribution in moderate-income geographies at 8.5 percent is lower than the 18.6 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 13.1 percent for aggregate lenders.

Richmond, VA MSA

The geographic distribution of home mortgage loans in the Richmond, VA MSA is good. Performance is good in low-income geographies and it is good in moderate-income

geographies. The distribution of home mortgage loans in low-income geographies at 3.1 percent is slightly lower than the 3.6 percent of owner-occupied housing units in low-income geographies, but it is higher than the 2.2 percent performance for aggregate lenders. The distribution in moderate-income geographies at 13.7 percent is lower than the 17.3 percent of owner-occupied housing units in moderate-income geographies, but it is higher than the 13.5 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Charlottesville VA MSA	660	176,713	8.3	7,621	2.2	2.6	1.7	18.6	8.5	13.1	46.8	51.8	51.4	32.4	37.1	33.8	0.0	0.0	0.0
FS Richmond VA MSA	2,841	602,983	35.7	51,005	3.6	3.1	2.2	17.3	13.7	13.5	40.1	38.1	38.4	39.0	45.1	45.9	0.0	0.0	0.0
LS Blacksburg-Christiansburg-Radford VA MSA	164	26,631	2.1	4,144	0.0	0.0	0.0	18.5	17.7	15.1	60.6	40.2	55.3	20.8	42.1	29.6	0.0	0.0	0.0
LS Harrisonburg VA MSA	119	20,348	1.5	3,153	0.0	0.0	0.0	8.5	4.2	6.8	69.1	58.0	66.1	22.4	37.8	27.1	0.0	0.0	0.0
LS Lynchburg VA MSA	384	56,292	4.8	7,230	1.1	1.0	0.7	13.9	18.0	12.6	65.8	62.0	61.2	19.2	19.0	25.4	0.0	0.0	0.0
LS Virginia Beach-Norfolk-Newport News VA MSA	3,559	761,329	44.7	68,856	1.9	1.9	1.7	16.8	14.7	15.2	39.5	36.1	38.1	41.8	47.3	45.1	0.0	0.1	0.0
LS Virginia Non-MSA	229	41,110	2.9	3,145	1.9	1.3	0.9	0.0	0.0	0.0	36.0	34.9	28.6	62.1	63.8	70.5	0.0	0.0	0.0
Total	7,956	1,685,406	100.0	145,154	2.3	2.2	1.7	16.3	13.5	13.8	44.0	39.7	40.9	37.5	44.5	43.5	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is excellent in the Charlottesville, VA MSA and Richmond, VA MSA.

Charlottesville, VA MSA

The geographic distribution of small loans to businesses in the Charlottesville, VA MSA is excellent. Performance is excellent in low-income geographies and it is good in moderate-income geographies. The distribution in low-income geographies at 3.2 percent is higher than the 3.1 percent of businesses in low-income geographies and it is higher than the 2.9 percent performance for aggregate lenders. The distribution in moderate-income geographies at 11.5 percent is lower than the 12.5 percent of businesses in moderate-income geographies and it is lower than the 12 percent performance for aggregate lenders.

Richmond, VA MSA

The geographic distribution of small loans to businesses in the Richmond, VA MSA is excellent. The distribution is excellent in low-income geographies and good in moderate-income geographies. The geographic distribution in low-income geographies at 5.6 percent is higher than the 5.2 percent of businesses in low-income geographies and it is higher than the 5.3 percent performance for aggregate lenders. The geographic distribution in moderate-income geographies at 17.1 percent is lower than the 20.2 percent of businesses in moderate-income geographies, but is higher than the 16.1 percent performance of aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate	% Busines sses	% Bank Loans	Aggre gate
FS Charlottesville VA MSA	1,179	23,593	9.8	4,458	3.1	3.2	2.9	12.5	11.5	12.0	45.8	47.1	46.5	38.0	38.2	38.6	0.6	0.3	0.0
FS Richmond VA MSA	4,483	145,175	38.4	27,233	5.2	5.6	5.3	20.2	17.1	16.1	35.5	34.2	33.6	38.9	43.0	44.9	0.1	0.2	0.1
LS Blacksburg-Christiansburg-Radford VA MSA	223	5,028	1.9	1,736	0.0	0.0	0.0	16.8	22.0	15.4	58.4	56.1	60.8	22.9	22.0	23.7	1.8	0.0	0.1
LS Virginia Non-MSA	260	3,653	2.2	1,230	3.0	2.7	2.0	0.0	0.0	0.0	40.0	46.2	37.6	57.1	51.2	60.4	0.0	0.0	0.0
LS Harrisonburg VA MSA	232	2,464	1.9	2,531	0.0	0.0	0.0	11.0	12.9	11.3	67.9	66.8	65.5	21.1	20.3	23.2	0.0	0.0	0.0
LS Lynchburg VA MSA	554	9,567	4.6	3,575	5.0	3.4	4.8	18.3	16.6	18.4	56.7	57.4	55.7	20.0	22.6	21.2	0.0	0.0	0.0
LS Virginia Beach-Norfolk-New port News VA MSA	5,072	122,571	42.3	26,708	4.6	2.9	4.3	18.8	16.6	16.4	37.7	36.3	36.1	38.5	44.0	42.8	0.3	0.2	0.4
Total	12,003	312,051	100.0	67,471	4.4	3.8	4.3	18.2	15.9	15.6	40.3	38.7	38.6	36.8	41.4	41.3	0.3	0.1	0.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is adequate. The distribution is adequate in the Charlottesville, VA MSA and Richmond, VA MSA.

Charlottesville, VA MSA

The geographic distribution of small loans to farms in the Charlottesville, VA MSA is adequate, based on poor performance in low-income geographies and adequate performance in moderate-income geographies. The geographic distribution in low-income geographies at 0 percent is lower than the 2.3 percent of farms in low-income geographies and it is lower than the 6.9 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 21.7 percent is lower than the 23.8 percent of farms in moderate-income geographies and it is lower than the 27.8 percent for aggregate lenders.

Richmond, VA MSA

The geographic distribution of small loans to farms in the Richmond, VA MSA is adequate, based on poor performance in low-income geographies and adequate performance in moderate-income geographies. The geographic distribution in low-income geographies at 0 percent is lower than the 1.9 percent of farms in low-income geographies and it is lower than the 0.5 percent for aggregate lenders. The geographic distribution in moderate-income geographies at 30 percent is higher than the 19.5 percent of farms in moderate-income geographies and it is lower than the 32.9 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate	% Farms	% Bank Loans	Aggre gate
FS Charlottesville VA MSA	23	176	17.2	72	2.3	0.0	6.9	23.8	21.7	27.8	44.8	34.8	40.3	29.1	43.5	25.0	0.0	0.0	0.0
FS Richmond VA MSA	30	259	22.4	213	1.9	0.0	0.5	19.5	30.0	32.9	40.9	40.0	35.2	37.7	40.0	31.5	0.0	0.0	0.0
LS Blacksburg-Christiansburg-Radford VA MSA	7	42	5.2	90	0.0	0.0	0.0	10.6	0.0	11.1	72.6	100.0	82.2	15.8	0.0	6.7	0.9	0.0	0.0
LS Virginia Non-MSA	16	155	14.0	41	0.6	0.0	0.0	0.0	0.0	0.0	53.4	46.2	46.3	46.0	62.5	53.7	0.0	0.0	0.0
LS Harrisonburg VA MSA	9	64	8.3	147	0.0	0.0	0.0	10.1	0.0	3.4	74.7	66.7	79.6	15.2	42.9	17.0	0.0	0.0	0.0
LS Lynchburg VA MSA	6	80	7.3	73	1.5	0.0	0.0	7.6	0.0	2.7	72.7	83.3	83.6	18.2	33.3	13.7	0.0	0.0	0.0
LS Virginia Beach-Norfolk-New port News VA MSA	43	518	36.9	94	1.8	7.1	1.1	13.2	9.7	9.6	40.9	34.9	42.6	43.9	55.8	46.8	0.2	0.0	0.0
Total	134	1,294	100.0	730	1.6	2.3	1.0	14.8	10.4	15.9	49.5	44.0	56.8	34.1	44.8	26.3	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is excellent. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is excellent. The distribution is good in the Charlottesville, VA MSA and excellent in the Richmond, VA MSA.

Charlottesville, VA MSA

The distribution of home mortgage loans by borrower income in the Charlottesville, VA MSA is good. The distribution is good to low-income borrowers and it is good to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 9.1 percent is lower than the 21.1 percent of low-income families in the MSA; however, the bank’s performance is higher than the 6.8 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 13.8 percent is lower than the 17.1 percent of moderate-income families and it is slightly lower than the 15.3 percent performance for aggregate lenders.

Richmond, VA MSA

The distribution of home mortgage loans by borrower income in the Richmond, VA MSA is excellent. The distribution is excellent to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank’s home mortgage loans to low-income borrowers at 12 percent is lower than the 20.4 percent of low-income families in the assessment area; however, it is significantly higher than the 6.6 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 17.2 percent is slightly lower than the 18 percent of moderate-income families in the MSA; however, it exceeds the 16.3 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Charlottesville VA MSA	660	176,713	8.3	7,621	21.1	9.1	6.8	17.1	13.8	15.3	21.1	18.0	19.9	40.7	52.6	41.2	0.0	6.5	16.8
FS Richmond VA MSA	2,841	602,983	35.7	51,005	20.4	12.0	6.6	18.0	17.2	16.3	21.1	19.5	19.5	40.5	36.3	35.6	0.0	15.0	22.0
LS Blacksburg-Christiansburg-Radford VA MSA	164	26,631	2.1	4,144	21.6	7.3	4.9	16.8	10.4	15.7	21.3	22.0	20.2	40.4	48.8	43.5	0.0	11.6	15.8
LS Harrisonburg VA MSA	119	20,348	1.5	3,153	18.1	11.8	5.3	20.3	7.6	16.4	21.8	22.7	21.0	39.9	49.6	38.2	0.0	8.4	19.1
LS Lynchburg VA MSA	384	56,292	4.8	7,230	20.4	8.6	7.2	18.6	21.1	17.7	21.0	23.7	21.5	40.1	39.1	33.3	0.0	7.6	20.4
LS Virginia Beach-Norfolk-Newport News VA MSA	3,559	761,329	44.7	68,856	19.2	10.5	3.9	18.2	17.9	15.1	22.1	19.3	19.5	40.6	36.2	30.4	0.0	16.2	31.1
LS Virginia Non-MSA	229	41,110	2.9	3,145	14.9	4.8	2.3	13.8	14.0	9.6	19.1	19.7	17.6	52.3	48.0	47.6	0.0	13.5	22.8
Total	7,956	1,685,406	100.0	145,154	19.7	10.6	5.2	18.0	17.1	15.6	21.5	19.6	19.6	40.8	38.5	33.9	0.0	14.2	25.7

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is good in the Charlottesville, VA MSA and Richmond, VA MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 34 percent of its small loans to businesses.

Charlottesville, VA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Charlottesville, VA MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 54.5 percent is lower than the 78.9 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is stronger than the 46.9 percent for aggregate lenders, overall performance is good.

Richmond, VA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Richmond, VA MSA is good. Based on businesses with known revenues, the proportion of the bank's small loans to businesses at 53.6 percent is lower than the 78 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank's distribution is stronger than the 47.7 percent for aggregate lenders, overall performance is good.

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
FS Charlottesville VA MSA	1,179	23,593	9.8	4,458	78.9	54.5	46.9	4.0	8.9	17.1	36.6
FS Richmond VA MSA	4,483	145,175	37.3	27,233	78.0	53.6	47.7	4.3	12.0	17.6	34.4
LS Blacksburg-Christiansburg-Radford VA MSA	223	5,028	1.9	1,736	75.9	44.4	52.7	4.0	13.5	20.1	42.2
LS Virginia Non-MSA	260	3,653	2.5	1,230	82.8	60.0	51.1	2.6	4.2	14.6	35.8
LS Harrisonburg VA MSA	232	2,464	2.3	2,531	77.0	45.7	43.4	4.6	6.9	18.3	47.4
LS Lynchburg VA MSA	554	9,567	4.6	3,575	78.7	49.8	51.6	4.3	10.3	17.0	39.9
LS Virginia Beach-Norfolk-New port News VA MSA	5,072	122,571	42.3	26,708	77.4	56.5	49.2	4.3	11.4	18.3	32.2
Total	12,003	312,051	100.0	67,471	77.8	54.5	48.5	4.3	11.1	17.9	34.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The distribution is good in the Charlottesville, VA MSA and adequate in the Richmond, VA MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 34 percent of its small loans to farms.

Charlottesville, VA MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Charlottesville, VA MSA is good. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 78.3 percent is lower than the 97.8 percent of farms with gross annual revenues of \$1 million or less. However, the bank’s distribution exceeds the 54.2 percent for aggregate lenders.

Richmond, VA MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Richmond, VA MSA is adequate. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 50 percent is lower than the 97.2 percent of farms with gross annual revenues of \$1 million or less. The bank’s distribution exceeds the 45.1 percent for aggregate lenders.

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Charlottesville VA MSA	23	176	20.0	72	97.6	78.3	54.2	1.6	10.0	0.8	22.2
FS Richmond VA MSA	30	259	28.0	213	97.2	50.0	45.1	1.7	7.1	1.1	46.7
LS Blacksburg-Christiansburg-Radford VA MSA	7	42	7.3	90	98.4	66.7	62.2	0.5	0.0	1.1	71.4
LS Virginia Non-MSA	16	155	14.0	41	97.8	68.8	46.3	0.8	15.4	1.4	18.8
LS Harrisonburg VA MSA	9	64	8.3	147	97.5	55.6	78.2	1.1	0.0	1.4	57.1
LS Lynchburg VA MSA	6	80	6.6	73	98.8	66.7	68.5	0.5	0.0	0.7	33.3
LS Virginia Beach-Norfolk-Newport News VA MSA	43	518	32.6	94	96.0	62.8	47.9	2.5	21.4	1.5	30.2
Total	134	1,294	100.0	730	97.1	61.2	57.5	1.7	7.5	1.2	33.6

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a significantly positive effect overall on the bank’s Lending Test performance in the state of Virginia. To help assess the bank’s capacity to lend, examiners compared the dollar volume of CD loans with the dollar volume of the bank’s net Tier 1 Capital allocated to the assessment area according to the assessment area’s proportion of deposits.

Charlottesville, VA MSA

In the Charlottesville, VA MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated one CD loan totaling \$6.5 million that helped provide 54 units of affordable housing. CD lending represents 5.4 percent of the allocated Tier 1 Capital. The bank met the community’s credit needs primarily through retail lending.

Richmond, VA MSA

In the Richmond, VA MSA, CD lending has a significantly positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated 17 CD loans totaling \$139.6 million that primarily helped provide 760 units of affordable housing. CD lending represents 10.8 percent of the allocated Tier 1 Capital, after considering approximately \$2 billion in deposits from national corporations in which the deposits did not derive from the local community.

Examples of CD loans include:

- The bank provided \$38 million in construction financing to develop 28th Street Senior, a 39-unit affordable multifamily housing project for seniors in Richmond, VA. All units are restricted to incomes at or below 50 percent of the area median income.
- The bank provided \$8.1 million in construction financing to develop Cavalier II Apartments in Petersburg, VA. The development provides 66 units of affordable housing with all units restricted to incomes at or below 60 percent of the area median income. Bank of America also provided the LIHTC equity investment for this project.
- The bank provided \$3.3 million in construction financing to construct Dove Street II Apartments, a new 48-unit affordable housing development in Richmond, VA. Of the 48 units, 10 are market rate with the remaining 38 units restricted to incomes at or below 50 percent of the area median income.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Virginia, lending under the MHA and HARP programs accounted for 79 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance varied across the limited-scope assessment areas. Performance in the Blacksburg, VA MSA, Lynchburg, VA MSA, and Virginia-Beach-Norfolk-Newport News, VA MSA is consistent with the Outstanding Lending Test performance in the state of Virginia. Performance in the Harrisonburg, VA MSA and Virginia Non-MSA is weaker than the overall Outstanding Lending Test performance in the state of Virginia primarily due to weaker geographic and borrower income distributions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Virginia is rated Outstanding. Investment performance is excellent in the Charlottesville, VA MSA and Richmond, VA MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Charlottesville, VA MSA

In the Charlottesville, VA MSA, Bank of America has an excellent level of CD investments. The bank made 53 CD investments during the current evaluation period totaling \$13.1 million. Approximately \$13 million or 99 percent of the investment dollars supported 177 units of affordable housing. In addition, the bank has 15 CD investments totaling \$705,000 it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$13.9 million or 11.5 percent of allocated Tier 1 Capital. An example of a significant investment is the bank's purchase of \$7.5 million in LIHTCs to finance the construction of Carlton View Apartments, a 54-unit affordable housing development in Charlottesville, VA. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$7.7 million or 59 percent of the investment dollars.

Richmond, VA MSA

In the Richmond, VA MSA, the bank has an excellent level of CD investments. The bank made 218 CD investments during the current evaluation period totaling \$174.5 million. Approximately \$162.4 million or 93 percent of the investment dollars supported 2,071 units of affordable housing. In addition, the bank has 127 CD investments totaling \$27.8 million it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Prior period and current period investments total \$202 million or 15.6 percent of allocated Tier 1 Capital, after considering the \$2 billion in deposits that did not originate from the assessment area. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing approximately \$110.7 million or 63 percent of the investment dollars.

Examples of community development investments include:

- The bank purchased \$3.8 million in LIHTCs to help fund the construction of 28th Street Senior, a 39-unit affordable housing development for seniors over the age of 55. All units are restricted to incomes at or below 50 percent of the area median income. The bank also provided a construction loan.

- The bank purchased \$6.2 million in LIHTCs to support the construction of Cavalier Apartments, a 66-unit affordable housing development in Petersburg, VA. All units are restricted to incomes at or below 50 percent of the area median income. The bank also provided a construction loan for this project.
- The bank purchased \$8.8 million in LIHTCs to support the construction of Cavalier Senior Apartments, an 80-unit affordable housing development for seniors over the age of 55. All units are restricted to incomes at or below 50 percent of the area median income. The bank also provided the construction loan for this project.

QUALIFIED INVESTMENTS		Geography: VIRGINIA				Evaluation Period: January 1, 2012 to December 31, 2016				
	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
MA/Assessment Area	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)	
Full Review										
Charlottesville, VA	15	705	53	13,146	68	13,851	4.82	1	5,316	
Richmond, VA	127	27,788	218	174,467	345	202,255	70.35	6	19,944	
Limited Review										
Blacksburg, VA	6	957	11	2,124	17	3,081	1.07	0	0	
Harrisonburg, VA	5	153	14	1,211	19	1,364	0.47	0	0	
Lynchburg, VA	3	136	16	1,078	19	1,214	0.42	0	0	
Virginia Beach, VA	28	19,408	77	31,434	105	50,842	17.68	1	44,640	
Virginia Non-MSA	2	96	20	1,267	22	1,364	0.47	0	0	
VIRGINIA - Statewide	0	0	14	2,084	14	2,084	0.72	0	0	
VIRGINIA - Non Assessed	44	5,681	86	5,758	130	11,439	3.98	0	0	
VIRGINIA	230	54,924	509	232,568	739	287,492	100.00	8	69,900	
(*) '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 bank's financial reporting system.										

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance varied across the limited-scope assessment areas. Investment performance in the Blacksburg, VA MSA and Virginia Beach-Norfolk-Newport News, VA MSA is consistent with the Outstanding Investment Test performance in the state of Virginia. Performance in the Harrisonburg, VA MSA, Lynchburg, VA MSA, and Virginia Non-MSA is weaker than the overall Outstanding Investment Test performance in the state of Virginia. Performance is weaker primarily due to lower levels of investments relative to the bank's capacity in those assessment areas.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Virginia is rated Outstanding. Service Test performance is adequate in the Charlottesville, VA MSA and excellent in the Richmond, VA MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Charlottesville, VA MSA

In the Charlottesville, VA MSA, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's nine financial centers with the distribution of the population. The bank has one financial center in a low-income geography representing 11.1 percent of its financial centers. Considering 7.1 percent of the population lives in low-income geographies, the distribution in low-income geographies is excellent. The bank has no financial centers located in moderate-income geographies. Considering that 19.2 percent of the population lives in moderate-income geographies along with the accessibility provided by adjacent financial centers described below, the distribution performance is poor.

Examiners also considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have a positive effect on the accessibility of the bank's service delivery systems to low- and moderate-income individuals and geographies.

The bank has two financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to moderate-income census tracts. The adjacent financial centers help fill the void left from the closure of the only financial center in moderate-income geographies.

Financial center openings and closings did adversely affect the accessibility of retail banking services, particularly in moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank opened one financial center in an upper-income geography and closed one financial center in a moderate-income geography. Considering the closure left no financial centers remaining in moderate-income geographies, the closure adversely affected the accessibility of retail banking services.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Financial centers are generally open 9:00 am to 5:00 pm Monday through Thursday and 9:00 am to 6:00 pm on Friday. Three financial centers in middle- and upper-income geographies provide Saturday banking 9:00 am to 12:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Charlottesville VA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	3	6.3	15,637	7.1	1	11.1	3	18.8	0	0.0	0	0.0
Moderate	11	22.9	42,096	19.2	0	0.0	0	0.0	0	0.0	1	100.0
Middle	20	41.7	100,937	46.2	4	44.4	6	37.5	0	0.0	0	0.0
Upper	13	27.1	57,422	26.3	3	33.3	7	43.8	1	100.0	0	0.0
NA	1	2.1	2,613	1.2	1	11.1	0	0.0	0	0.0	0	0.0
Totals	48	100.0	218,705	100.0	9	100.0	16	100.0	1	100.0	1	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Richmond, VA MSA

In the Richmond, VA MSA, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 24 financial centers with the distribution of the population. The bank has one financial center in a low-income geography representing 4.2 percent of its financial centers. Considering 7.5 percent of the population lives in low-income geographies along with additional access provided by adjacent financial centers, financial center distribution is adequate. The bank has seven financial centers in moderate-income geographies representing 29.2 percent of its financial centers. Considering 22.3 percent of the population resides in moderate-income geographies, financial center distribution is excellent.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The proportions of customers in low- and moderate-income geographies using online, telephone, mobile, and text banking either are near the proportion of the population in low- and moderate-income geographies or exceeds it. For example, cash dispensing ATM usage, full-service ATM usage, and text banking usage by customers in low- and moderate-income geographies exceed the proportion of the population in low- and moderate-income geographies.

The bank has six financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. One of the financial centers provide additional access to retail banking services in low-income geographies and five financial centers provide additional access in moderate-income geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank closed five financial centers, with two closures in low-income geographies, one closure in a moderate-income geography, and two closures in middle-income geographies. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconvenience the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Financial centers are

generally open 9:00 am to 5:00 pm Monday through Friday. Two financial centers in moderate-income geographies close at 4:00 pm. Saturday banking is available 9:00 am to 12:00 pm for 11 of the 24 financial centers.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Richmond VA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	29	9.8	90,011	7.5	1	4.2	2	3.3	0	0.0	2	40.0
Moderate	74	25.1	268,991	22.3	7	29.2	19	31.1	0	0.0	1	20.0
Middle	102	34.6	444,830	36.8	7	29.2	19	31.1	0	0.0	2	40.0
Upper	86	29.2	403,187	33.4	9	37.5	21	34.4	0	0.0	0	0.0
NA	4	1.4	1,082	0.1	0	0.0	0	0.0	0	0.0	0	0.0
Totals	295	100.0	1,208,101	100.0	24	100.0	61	100.0	0	100.0	5	100.0

Source: 2010 U.S. Census & Bank Data

Due to rounding, totals may not equal 100.0

Community Development Services

Charlottesville, VA MSA

The bank provides few community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 13 community development services targeted to low- and moderate-income individuals. Employees provided five financial education workshops for 57 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in eight webinars and workshops with non-profit organizations to help the organizations with capacity building. No employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Richmond, VA MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 75 community development services targeted to low- and moderate-income individuals. Employees provided homebuyer education workshops to 14 low- and moderate-income individuals, and provided 22 financial education workshops and 2 foreclosure prevention workshops for 1,024 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 24 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, 13 employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance varied across the limited-scope assessment areas. Performance in the Lynchburg, VA MSA and Virginia Beach-Norfolk-Newport News, VA MSA is consistent with the Outstanding Service Test performance in the state of Virginia. Performance in the Blacksburg, VA MSA, Harrisonburg, VA MSA, and Virginia Non-MSA is weaker than the overall Outstanding Service Test performance in the state of Virginia. Performance is weaker primarily due to weaker financial center distribution.

State of Washington

CRA Rating for Washington⁴⁶: **Outstanding**
The Lending Test is rated: Outstanding
The Investment Test is rated: High Satisfactory
The Service Test is rated: Outstanding

The major factors that support this rating include:

- Excellent volume of loans originated or purchased within the assessment areas;
- Excellent distribution of loans by geography and good distribution of loans by borrower income or business revenue size;
- High level of CD lending that has a significantly positive effect on overall lending performance;
- Good level and responsiveness of qualified investments; and
- Readily accessible service delivery systems to low- and moderate-income geographies and individuals.

Description of Institution's Operations in Washington

The state of Washington is Bank of America's 11th largest rating area based on its total deposits in the state when excluding deposits in the Portland-Vancouver-Hillsboro, OR-WA Multistate MSA. Examiners excluded the multistate MSA in the analysis of the state of Washington because examiners evaluated the multistate MSA as a separate rating area. As of June 30, 2016, the bank maintained approximately \$29.7 billion or 2.5 percent of its total domestic deposits in financial centers in areas of the state of Washington that do not include the multistate MSA. Of the 85 depository financial institutions operating in the areas of the state that exclude the multistate MSA, Bank of America, with a deposit market share of 21.6 percent, is the largest. Wells Fargo is the state's second largest depository financial institution with 160 branches and \$17.6 billion in deposits or 12.3 percent market share. JPMorgan Chase is the third largest depository financial institution with 204 branches and \$15.2 billion in deposits or 10.6 percent market share. US Bank is the fourth largest depository financial institution with 186 branches and \$15 billion in deposits or 10.5 percent market share. As of December 31, 2016, Bank of America operated 164 financial centers and 395 deposit-taking ATMs in the areas of the state that exclude the multistate MSA.

Examiners use the bank's deposit volume as an indicator of its capacity to lend and invest in its assessment areas. In some cases, not all deposits originated from the local community. In

⁴⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

the Seattle-Tacoma-Bellevue, WA MSA, Bank of America reported \$2 billion in deposits of national corporations, in which the funds originated from communities across the nation and deposited in financial centers near the headquarters of these large corporations. Adjusting the bank's total deposits in the MSA by excluding these external deposits from the local deposit base gives a more accurate indicator of the bank's capacity in the assessment area.

Refer to the community profiles for the state of Washington in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Washington

Examiners selected two assessment areas for full-scope reviews and the remaining eight assessment areas for limited-scope reviews. The full-scope assessment areas included the Bremerton-Silverdale, WA MSA and Seattle-Tacoma-Bellevue, WA MSA. While the Seattle-Tacoma-Bellevue, WA MSA carries approximately 88 percent weight of the overall conclusions based on the bank's presence there relative to all assessment areas in Washington, examiners based the conclusions and ratings for the state on the activities within all assessment areas. During the evaluation period, Bank of America originated or purchased 47,793 home mortgage loans totaling nearly \$13.6 billion, 89,483 small loans to businesses totaling \$2.1 billion, 1,334 small loans to farms totaling nearly \$28 million, and 114 CD loans totaling \$548 million. Based on loan volume, examiners weighted small loans to businesses, representing 65 percent of the overall volume, the most followed by home mortgage loans, representing 34 percent of the volume, and small loans to farms, representing less than 1 percent of the volume.

The bank did not originate or purchase a sufficient volume of small loans to farms in the Longview MSA to provide any meaningful analyses.

The OCC interviewed three local housing and community services based organizations, which identified affordable housing, as the most pressing community development need.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Lending Test in the state of Washington is rated Outstanding, based on excellent lending activity, excellent geographic distribution, good borrower income distribution, and high levels of CD lending that have a significantly positive effect on overall Lending Test performance. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Lending Activity

Based on total lending volume in Table 1, peer deposit and loan data for 2016, and relevant performance context considerations, the bank's lending activity in the state of Washington is excellent. Lending activity is excellent in the Bremerton-Silverdale, WA MSA and Seattle-Tacoma-Bellevue, WA MSA and excellent in all of the remaining assessment areas.

Bremerton-Silverdale, WA MSA

Lending activity in the Bremerton-Silverdale, WA MSA is excellent. Based on FDIC deposit data as of June 30, 2016, Bank of America has a deposit market share of 22.2 percent. The bank ranks first among 16 depository financial institutions in the assessment area, which places it in the top 7 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2 percent based on the number of home mortgage loans originated or purchased. The bank ranks 15th among 346 home mortgage lenders, which places it in the top 5 percent of lenders competing for loans. According to peer small business data for 2016, the bank has an 8.6 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks third among 53 small business lenders, which places it in the top 6 percent of lenders in the MSA. According to peer farm data for 2016, the bank has a market share of 36.7 percent based on the number of small loans to farms originated or purchased. The bank ranks first among nine farm lenders, which places it in the top 12 percent of lenders. Considering the bank's higher ranking among all lenders for home mortgage loans and small loans to farms relative to its ranking for deposits, overall lending activity is excellent.

Seattle-Tacoma-Bellevue, WA MSA

Lending activity in the Seattle-Tacoma-Bellevue, WA MSA is excellent. Based on FDIC deposit data as of June 30, 2016, the bank has a deposit market share of 26.7 percent. The bank ranks first among 52 depository financial institutions in the assessment area, which places it in the top 2 percent of institutions. According to peer mortgage data for 2016, the bank has a market share of 2.9 percent based on the number of home mortgage loans originated or purchased. The bank ranks eighth among 633 home mortgage lenders, which places it in the top 2 percent of lenders. According to peer small business data for 2016, the bank has a 13.1 percent market share of small loans to businesses based on the number of small loans to businesses originated or purchased. The bank ranks third among 128 small business lenders, which places it in the top 3 percent of lenders. For small loans to farms, the bank has a market share of 31.8 percent based on the number of small loans to farms originated or purchased. The bank ranks first among 20 farm lenders, which places it in the top 5 percent of lenders. Considering the bank's deposits and deposit market share include \$2 billion in deposits not derived from the MSA along with a similar ranking for home mortgage loans and a slightly lower ranking for small loans to businesses relative to its ranking for deposits, overall lending activity is excellent.

LENDING VOLUME		Geography: WASHINGTON						Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
Full Review												
Bremerton, WA	3.99	2,264	527,454	3,215	84,382	52	371	4	444	5,535	612,651	2.20
Seattle, WA	75.29	34,968	11,090,257	68,917	1,720,816	486	7,884	73	419,338	104,444	13,238,295	87.77
Limited Review												
Bellingham, WA	2.85	854	202,560	2,960	45,958	134	1,370	3	300	3,951	250,188	1.65
Kennewick, WA	2.12	1,009	174,806	1,774	37,958	144	2,605	8	47,523	2,935	262,892	1.45
Longview, WA	0.92	560	82,726	707	34,529	7	68	4	468	1,278	117,791	0.39
Mount Vernon, WA	1.52	643	138,911	1,374	19,308	81	2,039	4	356	2,102	160,614	0.70
Olympia, WA	2.88	1,593	347,055	2,372	37,773	30	791	6	49,035	4,001	434,654	1.36
Spokane, WA	4.89	2,795	448,463	3,916	84,167	69	1,546	2	12,606	6,782	546,782	3.06
Yakima, WA	1.99	913	112,629	1,665	25,912	176	5,765	5	16,206	2,759	160,512	1.02
Washington Non-MSA	3.56	2,194	431,028	2,583	56,455	155	5,527	5	1,517	4,937	494,527	0.39
WASHINGTON	100.00	47,793	13,555,889	89,483	2,147,258	1,334	27,966	114	547,793	138,724	16,278,906	100.00
(*) Loan data as of December 31, 2016. Rated area refers to either the state or multi-state MSA rating area. (**) The evaluation period for Community Development Loans is January 1, 2012 to December 31, 2016. (***) Deposit data as of June 30, 2016. Rated area refers to either the state or multi-state MSA as appropriate.												

Distribution of Loans by Income Level of the Geography

The bank’s geographic distribution of loans reflects good penetration in low- and moderate-income geographies. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases, small loans to businesses, and small loans to farms with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table O for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of home mortgage loans.

The overall geographic distribution of home mortgage loans is good. The distribution is excellent in the Bremerton-Silverdale, WA MSA and good in the Seattle-Tacoma-Bellevue, WA MSA.

Bremerton-Silverdale, WA MSA

The geographic distribution of home mortgage loans in the Bremerton-Silverdale, WA MSA is excellent. Because there are no low-income geographies, examiners based the overall conclusion on the excellent distribution in moderate-income geographies. The distribution in moderate-income geographies at 14.1 percent is higher than the 13.2 percent of owner-occupied housing units in moderate-income geographies and it is slightly higher than the 14 percent for aggregate lenders.

Seattle-Tacoma-Bellevue, WA MSA

The geographic distribution of home mortgage loans in the Seattle-Tacoma-Bellevue, WA MSA is good. Performance is excellent in low-income geographies and adequate in moderate-income geographies. The distribution of home mortgage loans in low-income geographies at

1.6 percent is consistent with the 1.6 percent of owner-occupied housing units in low-income geographies and it is slightly lower than the 1.7 percent performance for aggregate lenders. The distribution in moderate-income geographies at 11.9 percent is lower than the 15.6 percent of owner-occupied housing units in moderate-income geographies and it is lower than the 14.6 percent performance for aggregate lenders.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FS Bremerton-Silverdale WA MSA	768	191,580	4.3	11,828	0.0	0.0	0.0	13.2	14.1	14.0	61.7	56.1	61.7	25.1	29.8	24.2	0.0	0.0	0.0
FS Seattle-Tacoma-Bellevue WA MSA	13,678	5,161,239	75.9	175,475	1.6	1.6	1.7	15.6	11.9	14.6	50.3	45.4	51.0	32.5	41.0	32.7	0.0	0.0	0.0
LS Bellingham WA MSA	312	76,034	1.7	8,580	0.1	0.0	0.3	16.8	13.8	17.4	60.3	59.6	60.9	22.8	26.6	21.4	0.0	0.0	0.0
LS Kennewick-Richland WA MSA	441	89,835	2.4	10,557	4.3	4.1	2.8	20.1	16.6	15.1	36.2	32.4	37.0	39.3	46.9	45.1	0.0	0.0	0.0
LS Longview WA MSA	209	30,941	1.2	4,369	3.7	4.8	2.5	11.4	11.5	10.5	61.4	62.2	66.0	23.6	21.5	21.0	0.0	0.0	0.0
LS Mount Vernon-Anacortes WA MSA	233	53,845	1.3	5,244	0.0	0.0	0.0	9.9	6.0	8.1	67.8	73.8	72.5	22.3	20.2	19.4	0.0	0.0	0.0
LS Olympia-Tumwater WA MSA	560	136,307	3.1	11,866	0.3	0.2	0.0	11.2	10.0	10.8	60.7	60.0	61.1	27.8	29.8	28.1	0.0	0.0	0.0
LS Spokane-Spokane Valley WA MSA	1,024	165,141	5.7	21,417	1.7	1.6	1.5	20.4	23.7	18.6	41.6	36.2	39.0	36.3	38.5	40.9	0.0	0.0	0.0
LS Washington Non-MSA	452	93,452	2.5	10,334	0.2	0.0	0.3	4.9	6.0	3.8	56.4	51.1	49.9	38.5	42.9	46.0	0.0	0.0	0.0
LS Yakima WA MSA	345	40,183	1.9	5,686	1.3	1.7	1.3	25.2	32.8	16.4	35.1	31.3	32.4	38.5	34.2	49.9	0.0	0.0	0.0
Total	18,022	6,038,557	100.0	265,356	1.5	1.5	1.4	15.6	12.9	14.3	50.6	46.2	50.9	32.4	39.4	33.4	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table Q for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The distribution is good in the Bremerton-Silverdale, WA MSA and excellent in the Seattle-Tacoma-Bellevue, WA MSA.

Bremerton-Silverdale, WA MSA

The geographic distribution of small loans to businesses in the Bremerton-Silverdale, WA MSA is good. Because there are on low-income geographies, examiners based the overall conclusion on the good distribution in moderate-income geographies. The distribution in moderate-income geographies at 12.6 percent is lower than the 14.8 percent of businesses in moderate-income geographies; however, it is higher than the 11.7 percent performance for aggregate lenders.

Seattle-Tacoma-Bellevue, WA MSA

The geographic distribution of small loans to businesses in the Seattle-Tacoma-Bellevue, WA MSA is excellent. The distribution is excellent in low-income geographies and good in moderate-income geographies. The geographic distribution in low-income geographies at 4.9 percent is higher than the 4.7 percent of businesses in low-income geographies and it is higher than the 4 percent performance for aggregate lenders. The geographic distribution in moderate-income geographies at 16.1 percent is lower than the 17.6 percent of businesses in moderate-income geographies; however, it is higher than the 15.8 percent performance of aggregate lenders.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate
FS Bremerton-Silverdale WA MSA	1,919	45,647	3.4	6,598	0.0	0.0	0.0	14.8	12.6	11.7	54.1	52.0	56.8	31.1	35.4	31.5	0.0	0.0	0.0
FS Seattle-Tacoma-Bellevue WA MSA	43,951	1,033,142	78.5	114,813	4.7	4.9	4.0	17.6	16.1	15.8	45.1	43.8	45.8	32.5	35.1	34.3	0.1	0.0	0.0
LS Bellingham WA MSA	1,887	30,151	3.4	8,080	5.4	5.6	3.0	20.9	22.2	18.5	55.4	56.2	59.5	18.3	16.0	19.1	0.0	0.0	0.0
LS Kennewick-Richland WA MSA	1,064	21,212	1.9	5,561	6.5	4.6	4.3	25.7	29.4	23.9	32.4	31.1	32.0	34.9	34.6	39.6	0.5	0.4	0.3
LS Longview WA MSA	428	20,890	0.8	1,622	9.8	10.0	8.0	24.6	28.7	20.5	50.7	51.6	54.6	14.9	9.6	16.9	0.0	0.0	0.0
LS Mount Vernon-Anacortes WA MSA	821	11,183	1.5	4,298	0.0	0.0	0.0	16.7	15.0	13.0	63.8	62.9	60.6	19.5	22.2	26.2	0.0	0.0	0.2
LS Olympia-Tumwater WA MSA	1,467	20,782	2.6	6,859	2.7	3.6	1.7	19.6	19.8	15.0	50.2	47.5	52.3	27.6	29.1	31.0	0.0	0.0	0.0
LS Spokane-Spokane Valley WA MSA	2,468	49,343	4.4	14,151	8.7	10.0	7.3	27.9	26.8	21.5	34.2	29.3	32.4	29.3	34.0	38.8	0.0	0.0	0.0
LS Yakima WA MSA	991	14,967	1.8	4,828	7.8	7.2	4.9	28.7	26.7	20.4	33.3	34.1	36.5	30.2	32.0	38.2	0.0	0.0	0.0
LS Washington Non-MSA	965	19,028	1.8	5,688	1.6	0.9	1.0	7.5	5.5	5.1	54.3	50.6	48.5	36.7	43.6	45.4	0.0	0.0	0.0
Total	55,961	1,266,345	100.0	172,498	4.8	4.9	3.9	18.9	17.1	16.2	45.2	44.0	45.9	31.0	34.0	34.0	0.1	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table S for the facts and data used to evaluate the geographic distribution of the bank’s originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is poor. The geographic distribution is excellent in the Bremerton-Silverdale, WA MSA and poor in the Seattle-Tacoma-Bellevue, WA MSA.

Bremerton-Silverdale, WA MSA

The geographic distribution of small loans to farms in the Bremerton-Silverdale, WA MSA is excellent. Because there are no low-income geographies in the MSA, examiners based the overall conclusion on the excellent distribution in moderate-income geographies. The geographic distribution in moderate-income geographies at 13.6 percent is higher than the 7.1

percent of farms in moderate-income geographies and it exceeds the 6.7 percent for aggregate lenders.

Seattle-Tacoma-Bellevue, WA MSA

The geographic distribution of small loans to farms in the Seattle-Tacoma-Bellevue, WA MSA is poor, based on poor performance in low-income geographies and poor performance in moderate-income geographies. The bank did not originate or purchase any small loans to farms in low-income geographies compared to 0.3 percent for aggregate lenders. Approximately 2.2 percent of the farms are located in low-income geographies. The geographic distribution in moderate-income geographies at 6.3 percent is lower than the 15.4 percent of farms in moderate-income geographies and it is lower than the 10.1 percent for aggregate lenders.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FS Bremerton-Silverdale WA MSA	33	270	4.3	30	0.0	0.0	0.0	7.1	13.6	6.7	59.4	48.5	40.0	33.5	42.4	53.3	0.0	0.0	0.0
FS Seattle-Tacoma-Bellevue WA MSA	300	4,014	37.8	296	2.2	0.0	0.3	15.4	6.3	10.1	52.1	54.3	55.4	30.3	39.3	34.1	0.0	0.0	0.0
LS Bellingham WA MSA	86	874	13.7	153	0.4	3.2	0.7	14.4	17.4	8.5	73.8	65.1	81.0	11.4	16.3	9.8	0.0	0.0	0.0
LS Kennewick-Richland WA MSA	84	1,123	10.6	259	2.2	3.8	0.0	25.8	28.6	35.1	55.2	53.6	54.1	16.6	16.7	10.4	0.3	0.0	0.4
LS Longview WA MSA	4	20	0.8	7	8.9	0.0	0.0	13.2	0.0	14.3	58.3	75.0	71.4	19.7	50.0	14.3	0.0	0.0	0.0
LS Mount Vernon-Anacortes WA MSA	51	1,291	6.4	68	0.0	0.0	0.0	9.3	9.8	7.4	57.2	51.0	60.3	33.5	39.2	32.4	0.0	0.0	0.0
LS Olympia-Tumwater WA MSA	19	478	2.5	32	0.9	0.0	3.1	13.1	14.3	34.4	61.6	73.7	40.6	24.4	28.6	21.9	0.0	0.0	0.0
LS Spokane-Spokane Valley WA MSA	45	1,054	5.7	164	2.4	0.0	1.8	15.9	22.2	11.6	47.8	57.8	60.4	33.9	20.0	26.2	0.0	0.0	0.0
LS Yakima WA MSA	110	3,425	13.9	322	1.9	0.0	0.0	16.3	11.8	19.3	57.8	56.4	61.2	24.1	31.8	19.6	0.0	0.0	0.0
LS Washington Non-MSA	61	2,912	9.7	263	1.1	0.0	1.5	3.8	10.7	0.4	68.0	68.9	78.7	27.1	26.2	19.4	0.0	0.0	0.0
Total	793	15,461	100.0	1,594	1.8	0.4	0.6	14.4	11.7	14.7	56.4	57.1	62.9	27.4	30.9	21.7	0.0	0.0	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Lending Gap Analysis

For areas receiving full-scope reviews, examiners noted no conspicuous or unexplained gaps in lending in low- and moderate-income geographies.

Inside/Outside Ratio

See the “Inside/Outside Ratio” section within the overall Scope of Evaluation.

Distribution of Loans by Income Level of the Borrower

The bank’s distribution of loans by borrower income and revenue size is good. For this analysis, examiners compared the bank’s HMDA-reportable loan originations and purchases,

small business, and small farm lending with available demographic information. Examiners also considered any relevant performance context information and aggregate lending data.

Home Mortgage Loans

Refer to Table P for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall distribution of home mortgage loans by borrower income is good. The distribution is excellent in the Bremerton-Silverdale, WA MSA and good in the Seattle-Tacoma-Bellevue, WA MSA.

Bremerton-Silverdale, WA MSA

The distribution of home mortgage loans by borrower income in the Bremerton-Silverdale, WA MSA is excellent. The distribution is excellent to low-income borrowers and it is excellent to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 10.2 percent is lower than the 17.9 percent of low-income families in the MSA; however, the bank's performance significantly exceeds the 4.2 percent for aggregate lenders. The proportion of home mortgage loans to moderate-income borrowers at 19.4 percent is higher than the 19 percent of moderate-income families and it is higher than the 17.1 percent performance for aggregate lenders.

Seattle-Tacoma-Bellevue, WA MSA

The distribution of home mortgage loans by borrower income in the Seattle-Tacoma-Bellevue, WA MSA is good. The distribution is good to low-income borrowers and it is good to moderate-income borrowers. The proportion of the bank's home mortgage loans to low-income borrowers at 7 percent is lower than the 20.2 percent of low-income families in the assessment area; however, it is higher than the 3.7 percent performance for aggregate lenders. The proportion of loans to moderate-income borrowers at 15 percent is lower than the 17.9 percent of moderate-income families in the MSA; however, it exceeds the 14.4 percent performance for aggregate lenders.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FS Bremerton-Silverdale WA MSA	768	191,580	4.3	11,828	17.9	10.2	4.2	19.0	19.4	17.1	22.9	24.1	23.9	40.2	38.4	35.6	0.0	7.9	19.2
FS Seattle-Tacoma-Bellevue WA MSA	13,678	5,161,239	75.9	175,475	20.2	7.0	3.7	17.9	15.0	14.4	22.2	20.0	22.9	39.7	52.6	45.2	0.0	5.3	13.7
LS Bellingham WA MSA	312	76,034	1.7	8,580	20.2	4.8	4.1	17.7	15.1	15.3	23.8	23.7	23.7	38.3	48.7	44.1	0.0	7.7	12.8
LS Kennewick-Richland WA MSA	441	89,835	2.4	10,557	21.9	12.0	5.2	17.5	20.4	16.6	20.0	21.5	22.1	40.7	41.3	41.6	0.0	4.8	14.6
LS Longview WA MSA	209	30,941	1.2	4,369	20.7	8.1	4.7	17.8	18.2	16.2	20.6	23.4	22.3	40.9	39.7	35.8	0.0	10.5	21.0
LS Mount Vernon-Anacortes WA MSA	233	53,845	1.3	5,244	18.8	6.0	2.4	17.3	12.0	12.9	25.4	20.2	22.7	38.5	51.5	47.4	0.0	10.3	14.6
LS Olympia-Tumwater WA MSA	560	136,307	3.1	11,866	19.2	8.0	3.3	17.5	17.9	15.0	23.9	24.6	26.1	39.4	35.9	33.9	0.0	13.6	21.7
LS Spokane-Spokane Valley WA MSA	1,024	165,141	5.7	21,417	19.8	14.9	5.1	18.3	20.2	16.4	21.8	20.4	21.3	40.1	34.8	37.1	0.0	9.7	20.1
LS Washington Non-MSA	452	93,452	2.5	10,334	17.3	7.7	2.4	15.7	13.7	9.1	21.7	19.9	20.7	45.3	48.5	48.7	0.0	10.2	19.1
LS Yakima WA MSA	345	40,183	1.9	5,686	22.4	12.2	2.9	16.9	20.6	11.3	19.9	26.7	19.7	40.9	33.0	50.0	0.0	7.5	16.1
Total	18,022	6,038,557	100.0	265,356	20.0	7.8	3.8	17.8	15.8	14.6	22.1	20.6	22.8	40.1	49.5	43.6	0.0	6.2	15.2

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Businesses

Refer to Table R for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of small loans to businesses with gross annual revenues of \$1 million or less is good overall. The distribution is adequate in the Bremerton-Silverdale, WA MSA and good in the Seattle-Tacoma-Bellevue, WA MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 36 percent of its small loans to businesses.

Bremerton-Silverdale, WA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Bremerton-Silverdale, WA MSA is adequate. Based on businesses with known revenues, the proportion of the bank’s small loans to businesses at 49.1 percent is lower than the 82.1 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 39 percent for aggregate lenders, overall performance is adequate.

Seattle-Tacoma-Bellevue, WA MSA

The distribution of small loans to businesses with gross annual revenues of \$1 million or less in the Seattle-Tacoma-Bellevue, WA MSA is good. Based on businesses with known revenues,

the proportion of the bank’s small loans to businesses at 51.8 percent is lower than the 78.8 percent of businesses with gross annual revenues of \$1 million or less. Considering the bank’s distribution is stronger than the 38.9 percent for aggregate lenders, overall performance is good.

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
FS Bremerton-Silverdale WA MSA	1,919	45,647	3.4	6,598	82.1	49.1	39.0	3.1	11.2	14.8	39.7
FS Seattle-Tacoma-Bellevue WA MSA	43,951	1,033,142	78.5	114,813	78.8	51.8	38.9	4.6	12.3	16.6	35.9
LS Bellingham WA MSA	1,887	30,151	3.4	8,080	80.6	48.2	35.3	4.5	13.7	14.9	38.1
LS Kennewick-Richland WA MSA	1,064	21,212	1.9	5,561	77.6	52.6	38.4	4.4	11.0	18.0	36.4
LS Longview WA MSA	428	20,890	0.8	1,622	78.5	46.7	35.3	5.2	22.7	16.3	30.6
LS Mount Vernon-Anacortes WA MSA	821	11,183	1.5	4,298	79.0	47.1	33.6	4.7	12.3	16.3	40.6
LS Olympia-Tumwater WA MSA	1,467	20,782	2.6	6,859	79.8	50.9	37.4	3.5	11.7	16.7	37.4
LS Spokane-Spokane Valley WA MSA	2,468	49,343	4.4	14,151	78.7	48.7	35.7	4.9	13.3	16.4	37.9
LS Yakima WA MSA	991	14,967	1.9	4,828	76.4	44.7	38.4	5.4	14.6	18.3	40.7
LS Washington Non-MSA	965	19,028	1.7	5,688	80.1	51.7	40.1	3.2	10.9	16.7	37.4
Total	55,961	1,266,345	100.0	172,498	79.0	51.2	38.3	4.5	12.4	16.5	36.4

Source: 2016 D&B Data: 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Small Loans to Farms

Refer to Table T for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to farms.

The distribution of small loans to farms with gross annual revenues of \$1 million or less is adequate. The distribution is adequate in the Bremerton-Silverdale, WA MSA and Seattle-Tacoma-Bellevue, WA MSA. The bank did not collect or consider the gross annual revenues in the underwriting of approximately 42 percent of its small loans to farms.

Bremerton-Silverdale, WA MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Bremerton-Silverdale, WA MSA is adequate. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 45.5 percent is lower than the 97.5 percent of farms with gross annual revenues of \$1 million or less; however, the bank’s distribution exceeds the 40 percent for aggregate lenders.

Seattle-Tacoma-Bellevue, WA MSA

The distribution of small loans to farms with gross annual revenues of \$1 million or less in the Seattle-Tacoma-Bellevue, WA MSA is adequate. Based on farms with known revenues, the proportion of the bank’s small loans to farms at 47.7 percent is lower than the 95.5 percent of farms with gross annual revenues of \$1 million or less and it is lower than the 54.1 percent for aggregate lenders.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FS Bremerton-Silverdale WA MSA	33	270	4.2	30	97.5	45.5	40.0	1.8	12.5	0.6	51.5
FS Seattle-Tacoma-Bellevue WA MSA	300	4,014	39.9	296	95.5	47.7	54.1	2.9	9.7	1.6	42.7
LS Bellingham WA MSA	86	874	10.8	153	95.9	45.3	43.8	2.9	15.1	1.2	39.5
LS Kennewick-Richland WA MSA	84	1,123	10.6	259	91.5	44.0	47.1	6.3	15.5	2.2	40.5
LS Longview WA MSA	4	20	0.8	7	93.6	75.0	42.9	2.6	50.0	3.8	0.0
LS Mount Vernon-Anacortes WA MSA	51	1,291	6.4	68	92.5	51.0	45.6	5.2	15.7	2.3	33.3
LS Olympia-Tumwater WA MSA	19	478	2.5	32	96.1	31.6	43.8	2.1	14.3	1.8	63.2
LS Spokane-Spokane Valley WA MSA	45	1,054	5.7	164	97.4	46.7	44.5	1.7	6.7	0.9	48.9
LS Yakima WA MSA	110	3,425	13.9	322	89.9	26.4	52.8	7.8	30.9	2.3	42.7
LS Washington Non-MSA	61	2,912	9.7	263	97.3	44.3	54.8	1.1	16.4	1.6	39.3
Total	793	15,461	100.0	1,594	95.1	43.6	49.9	3.3	14.1	1.6	42.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Community Development Lending

CD lending has a significantly positive effect overall on the bank's Lending Test performance in the state of Washington. To help assess the bank's capacity to lend, examiners compared the dollar volume of CD loans with the dollar volume of the bank's net Tier 1 Capital allocated to the assessment area according to the assessment area's proportion of deposits.

Bremerton-Silverdale, WA MSA

In the Bremerton-Silverdale, WA MSA, CD lending has a neutral effect on the lending performance in the assessment area. During the evaluation period, the bank originated four CD loans totaling \$444,000 that helped provide eight units of affordable housing. CD lending represents 0.6 percent of the allocated Tier 1 Capital. The bank met the community's credit needs primarily through retail lending.

Seattle-Tacoma-Bellevue, WA MSA

In the Seattle-Tacoma-Bellevue, WA MSA, CD lending has a significantly positive effect on the lending performance in the assessment area. During the evaluation period, the bank originated 73 CD loans totaling \$419.3 million that primarily helped provide more than 3,200 units of affordable housing. CD lending represents 13.9 percent of the adjusted allocated Tier 1 Capital, after considering approximately \$2 billion in deposits from national corporations in which the deposits did not derive from the local community. Examples of significant CD loans include:

- The bank provided \$11.4 million in construction financing for the Plymouth Housing Group's 65-unit affordable housing development. The developer set aside one unit for the onsite property manager. The remaining 64 studio apartment units are restricted to incomes at or below 60 percent of the area median income.
- The bank provided \$2.4 million in funding to acquire and predevelop City Center Apartments, a 347-unit multifamily housing project in Lynnwood, WA. Because Bank of

America funded approximately 75 percent of the construction loans, examiners allocated 260 of the units to Bank of America. All units are restricted to incomes at or below 60 percent of the area median income.

- In partnership with Alliant Capital, the bank provided \$3.9 million in acquisition and predevelopment financing to develop Villas at Auburn in Auburn, WA. The development is a 295-unit multifamily housing project. Examiners allocated 236 units to the bank based on its 80 percent participation in the partnership. All units are restricted to incomes at or below 60 percent of the area median income.

Product Innovation and Flexibility

Bank of America offers various national and local flexible lending programs that have benefitted borrowers during the evaluation period. These include programs such as America's Home Grant, Affordable Loan Solutions, and Business Advantage Credit Line. The bank also participates with multiple organizations that provide flexible lending through NACA and other affordable housing programs. Within the state of Washington, lending under the MHA and HARP programs accounted for 84 percent of the dollar volume of all loans under flexible lending programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending Test performance varied across the limited-scope assessment areas. Performance in the Kennewick-Richland, WA MSA, Longview, WA MSA, Olympia-Tumwater, WA MSA, Spokane-Spokane Valley, WA MSA, Yakima, WA MSA, and Washington Non-MSA is consistent with the Outstanding Lending Test performance in the state of Washington. Performance in the Bellingham, WA MSA and Mount Vernon-Anacortes, WA MSA is weaker than the Outstanding Lending Test performance in the state of Washington primarily due to weaker distributions of loans by borrower income and lower levels of CD lending.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Bank of America's performance under the Investment Test in the state of Washington is rated High Satisfactory. Investment Test performance is poor in the Bremerton-Silverdale, WA MSA and it is excellent in the Seattle-Tacoma-Bellevue, WA MSA. Poor performance in limited-scope assessment areas has a negative effect on the state rating.

Bremerton-Silverdale, WA MSA

In the Bremerton-Silverdale, WA MSA, Bank of America has a poor level of CD investments. The bank made 21 CD investments during the current evaluation period totaling \$2.6 million. In addition, the bank has six CD investments totaling \$278,000 it made during a prior evaluation period that are still outstanding and continue to provide benefit to the community. Approximately \$2.6 million or 98 percent of the investment dollars supported 15 units of affordable housing. Prior period and current period investments total \$2.9 million or 3.6 percent of allocated Tier 1 Capital. The majority of current period investments are neither innovative nor complex with mortgage-backed securities representing \$2.6 million or 97 percent of the investment dollars.

Seattle-Tacoma-Bellevue, WA MSA

In the Seattle-Tacoma-Bellevue, WA MSA, the bank has an excellent level of CD investments. The bank made 330 CD investments during the evaluation period totaling \$258.1 million. In addition, the bank has 158 CD investments totaling \$85.4 million it made during a prior evaluation period that are still outstanding and continuing to provide benefit to the community. Prior period and current period investments total \$343.5 million or 11.4 percent of the adjusted allocated Tier 1 Capital, after considering the \$2 billion in deposits that did not originate from the assessment area. Approximately \$249.9 million or 97 percent of the investment dollars supported 3,258 units of affordable housing. The majority of current period investments are innovative or complex with LIHTCs representing approximately \$131.4 million or 51 percent of the investment dollars.

Examples of community development investments include:

- The bank purchased \$7.8 million in LIHTCs to help fund the construction of Aurora Apartments, a 71-unit affordable housing development in Seattle, WA. Tenants targeted are homeless single adults or couples without children and homeless disabled veterans. Five units are not income restricted and three units are reserved for resident managers. The remaining 63 units are restricted to incomes at or below 30 percent of the area median income.
- The bank purchased \$13.6 million in LIHTCs to support the construction of Compass at Ronald Commons, an affordable housing development in Seattle, WA. The project is a mixed-use building consisting of two condominium developments. The first condominium development includes 60 units that are restricted to incomes at or below 50 percent of the area median income. Half of those units are restricted to incomes at 30 percent of the area median income, which are further restricted to homeless families and veterans, and households with individuals with developmental disabilities. The bank also provided a construction loan for this project. The second condominium development houses Hopelink's Shoreline Integrated Service Center. The service center features a full, grocery store-style food bank and provides emergency financial help for eviction prevention and energy assistance. The organization also offers adult education and financial coaching and assistance for those seeking employment.

- The bank purchased \$10.6 million in LIHTCs to support the construction of Delridge Supportive Housing, a new four-story 66-unit affordable housing development in Seattle. This housing development will provide permanent supportive housing for chronically homeless single adults. All units are restricted to incomes at or below 30 percent of the area median income. The bank also provided the construction loan for this project.

Table 14. Qualified Investments								2012-2016	
QUALIFIED INVESTMENTS		Geography: WASHINGTON			Evaluation Period: January 1, 2012 to December 31, 2016				
MA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	% of Total \$'s	#	\$(000s)
Full Review									
Bremerton, WA	6	278	21	2,643	27	2,920	0.78	0	0
Seattle, WA	158	85,363	330	258,144	488	343,506	91.21	6	38,918
Limited Review									
Bellingham, WA	6	1,119	18	1,326	24	2,445	0.65	0	0
Kennewick, WA	5	336	19	2,277	24	2,613	0.69	0	0
Longview, WA	4	93	12	541	16	634	0.17	0	0
Mount Vernon, WA	4	1,696	16	723	20	2,419	0.64	0	0
Olympia, WA	3	145	17	2,474	20	2,618	0.70	0	0
Spokane, WA	9	1,133	24	10,531	33	11,664	3.10	0	0
Yakima, WA	10	676	14	1,044	24	1,720	0.46	0	0
Washington Non-MSA	4	522	8	571	12	1,093	0.29	0	0
WASHINGTON - Statewide	0	0	27	252	27	252	0.07	0	0
WASHINGTON - Non Assessed	19	771	31	3,951	50	4,722	1.25	0	0
WASHINGTON	228	92,131	537	284,477	765	376,608	100.00	6	38,918
(*) '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 bank's financial reporting system.									

Conclusions for Areas Receiving Limited-Scope Reviews

Investment Test performance varied across the limited-scope assessment areas. Performance in the Mount Vernon-Anacortes, WA MSA is consistent with the High Satisfactory Investment Test performance in the state of Washington. Performance in the Spokane-Spokane Valley, WA MSA is stronger than the High Satisfactory Investment Test performance in the state of Washington primarily due to a higher level of CD investments relative to the bank's financial capacity in the assessment area. Performance in the Bellingham, WA MSA, Kennewick-Richland, WA MSA, Longview, WA MSA, Olympia-Tumwater, WA MSA, Yakima, WA MSA, and Washington Non-MSA is weaker than the High Satisfactory Investment Test performance in the state of Washington primarily due to the limited community development investment activity. The poor performance in a majority of the limited-scope assessment areas has a negative effect on the overall Investment Test rating.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Bank of America's performance under the Service Test in the state of Washington is rated Outstanding. Service Test performance is excellent in the Bremerton-Silverdale, WA MSA and Seattle-Tacoma-Bellevue, WA MSA. Performance in limited-scope assessment areas has a neutral effect on the state rating.

Retail Banking Services

Refer to Table C for the facts and data used to evaluate the accessibility of the bank's retail banking services.

Bremerton-Silverdale, WA MSA

In the Bremerton-Silverdale, WA MSA, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank's seven financial centers with the distribution of the population. Because there are no low-income geographies, examiners based the conclusion on the distribution performance in moderate-income geographies. The bank has two or 28.6 percent of its financial centers located in moderate-income geographies. Considering 19.5 percent of the population lives in moderate-income geographies, the distribution performance is excellent.

Examiners also considered the bank's alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank's products and services. Based on customer usage, alternative delivery systems have no effect on the retail banking services conclusion.

The bank has one financial center in a middle-income census tract that is adjacent to or in very close proximity to a moderate-income census tract. The adjacent financial center provides individuals in moderate-income geographies additional accessibility to retail banking services.

Financial center openings and closings did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, the bank closed one financial center in an upper-income geography.

Banking products and services do not vary in a way that inconveniences the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. All financial centers are open 10:00 am to 5:00 pm Monday through Thursday and 10:00 am to 6:00 pm on Friday. All financial centers, except one located in a moderate-income geography, are open for Saturday banking between the hours of 10:00 am and 1:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Bremerton-Silverdale WA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	12	21.8	48,900	19.5	2	28.6	4	23.5	0	0.0	0	0.0
Middle	31	56.4	145,326	57.9	4	57.1	10	58.8	0	0.0	0	0.0
Upper	11	20.0	56,907	22.7	1	14.3	3	17.6	0	0.0	1	100.0
NA	1	1.8	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	55	100.0	251,133	100.0	7	100.0	17	100.0	0	100.0	1	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Seattle-Tacoma-Bellevue, WA MSA

In the Seattle-Tacoma-Bellevue, WA MSA, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. Examiners based this conclusion on a comparison of the distribution of the bank’s 128 financial centers with the distribution of the population. The bank has 11 or 8.6 percent of its financial centers in low-income geographies. The bank also has 27 or 8.9 percent of its ATMs in low-income geographies. Considering 4 percent of the population lives in low-income geographies along with additional access provided by adjacent financial centers, financial center distribution is excellent. The bank 32 or 25 percent of its financial centers and 73 or 23.9 percent of its ATMs in moderate-income geographies. Considering 20.8 percent of the population resides in moderate-income geographies, financial center distribution is excellent.

Examiners also considered the bank’s alternative delivery systems, including ATMs, and telephone, online, mobile, and text banking in evaluating accessibility to the bank’s products and services. Based on customer usage, alternative delivery systems have a significantly positive effect on the accessibility of the bank’s service delivery systems to low- and moderate-income individuals and geographies. The proportions of customers in low- and moderate-income geographies using the five ADS platforms are near to or exceeds the proportion of the population in low- and moderate-income geographies. For example, cash dispensing ATM usage, full-service ATM usage, and text banking usage by customers in low- and moderate-income geographies exceed the proportion of the population in low- and moderate-income geographies. Considering the additional accessibility provided through alternative delivery systems, Alternative delivery systems have a significantly positive effect on the retail banking services conclusion.

The bank has 18 financial centers in middle- and upper-income census tracts that are adjacent to or in very close proximity to low- and moderate-income census tracts. Six of the adjacent financial centers provide additional access to retail banking services in low-income geographies and twelve financial centers provide additional access in moderate-income geographies.

Financial center openings and closings generally did not adversely affect the accessibility of retail banking services, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, the bank closed 13 financial centers and opened five. The bank closed one financial center in a low-income geography, one in a moderate-income geography, and the remaining eleven in middle- and upper-income

geographies. Despite the closures, financial centers remain readily accessible to individuals and geographies of different income levels.

Banking products and services do not vary in a way that inconvenience the assessment area, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. The bank offers a full range of products and services. Financial centers are generally open 10:00 am to 6:00 pm Monday through Friday. Saturday banking is generally available 10:00 am to 1:00 pm.

Table C - Branch and ATM Distribution by Geography Income Level

Assessment Area: FS Seattle-Tacoma-Bellevue WA MSA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	31	4.3	139,040	4.0	11	8.6	27	8.9	1	20.0	1	7.7
Moderate	153	21.2	714,671	20.8	32	25.0	73	23.9	0	0.0	1	7.7
Middle	334	46.3	1,652,826	48.0	52	40.6	129	42.3	2	40.0	7	53.8
Upper	199	27.6	927,566	27.0	33	25.8	73	23.9	2	40.0	4	30.8
NA	4	0.6	5,706	0.2	0	0.0	3	1.0	0	0.0	0	0.0
Totals	721	100.0	3,439,809	100.0	128	100.0	305	100.0	5	100.0	13	100.0

Source: 2010 U.S. Census & Bank Data
 Due to rounding, totals may not equal 100.0

Community Development Services

Bremerton-Silverdale, WA MSA

The bank provides few community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 12 community development services targeted to low- and moderate-income individuals. Employees provided five financial education for 131 elementary school students that are primarily from low- and moderate-income families. Employees participated in seven webinars and workshops with non-profit organizations to help the organizations with capacity building. No employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Seattle-Tacoma-Bellevue, WA MSA

The bank provides a relatively high level of community development services in the MSA. During the evaluation period, the bank participated with community development organizations to provide 168 community development services targeted to low- and moderate-income individuals. Employees provided 42 financial education workshops and 70 foreclosure prevention workshops for 1,200 individuals. Attendees to the financial education workshops were primarily students from low- and moderate-income families. Employees participated in 47 webinars and workshops with non-profit organizations to help the organizations with capacity building. In addition, nine employees served on the boards or committees of community organizations. The types of CD services provided are responsive to the needs identified in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Service Test performance varied across the limited-scope assessment areas. Performance in the Bellingham, WA MSA, Longview, WA MSA, and Yakima, WA MSA is consistent with the Outstanding Service Test performance in the state of Washington. Performance in the Kennewick-Richland, WA MSA, Mount Vernon-Anacortes, WA MSA, Olympia-Tumwater, WA MSA, Spokane-Spokane Valley, WA MSA, and Washington Non-MSA is weaker than the Outstanding Service Test performance in the state of Washington. Performance is weaker primarily due to the weaker distribution of financial centers.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that examiners reviewed, and loan products examiners considered. The table also reflects the metropolitan and nonmetropolitan areas 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	Lending Test, CD Loans, Investment Test, Service Test: January 1, 2012 to December 31, 2016	
Financial Institution	Products Reviewed	
Bank of America, N.A. (BANA) Charlotte, North Carolina	Home Mortgage Loans, Small Loans to Businesses, Small Loans to Farms, Letters of Credit, CD Loans, CD Investments, CD Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Banc of America Community Development Corporation	BANA Subsidiary	CD Loans; CD Investments
Banc of America Leasing & Capital, LLC	BANA Subsidiary	CD Investments
NB Holdings Corporation	BAC Subsidiary	CD Investments
Banc of America CDE, LLC	BANA Subsidiary	CD Investments
Legacy FIA Card Services	BANA Subsidiary	CD Services
Framework, Inc.	BANA Subsidiary	CD Investments
Merrill Lynch Community Development Company, LLC	BANA Subsidiary	CD Investments
ML BUSA Community Development Corporation	BANA Subsidiary	CD Investments
Banc of America Preferred Funding Corp (PFC)	BANA Subsidiary	CD Investments
Specialized Lending, LLC	BANA Subsidiary	CD Investments
The Bank of America Charitable Foundation, Inc.	BANA Subsidiary	CD Investments
Banc of America Public Capital Corp	BANA Subsidiary	CD Loans

List of Assessment Areas and Type of Examination			
Assessment Area and MSA/MD # (Some AAs include portions of counties)		Type of Exam	Other Information (Reflects counties within aggregated AAs)
Multistate MSAs			
Allentown-Bethlehem-Easton, PA-NJ			
Allentown-Bethlehem-Easton, PA-NJ	10900	Full-Scope	Entire MSA
Augusta-Richmond County, GA-SC			
Augusta-Richmond County, GA-SC	12260	Full-Scope	Entire MSA
Boston-Cambridge-Newton, MA-NH			
Boston-Cambridge-Newton, MA-NH	14460	Full-Scope	Entire MSA
Charlotte-Concord-Gastonia, NC-SC			
Charlotte-Concord-Gastonia, NC-SC	16740	Full-Scope	Entire MSA
Kansas City, MO-KS			
Kansas City, MO-KS	28140	Full-Scope	Entire MSA
Myrtle Beach-Conway-North Myrtle Beach SC-NC			
Myrtle Beach-Conway-North Myrtle Beach, SC-NC	34820	Full-Scope	Entire MSA
New York-Newark-Jersey City, NY-NJ			
New York-Newark-Jersey City, NY-NJ	35620	Full-Scope	Entire MSA except Pike County, PA
Philadelphia-Camden-Wilmington, PA-NJ-DE - MD			
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD	37980	Full-Scope	Entire MSA except Salem County, NJ and Cecil County, MD
Portland-Vancouver-Hillsboro, OR-WA			
Portland-Vancouver-Hillsboro, OR-WA	38900	Full-Scope	Entire MSA
Providence-Warwick, RI-MA			
Providence-Warwick, RI-MA	39300	Full-Scope	Entire MSA
Salisbury, MD-DE			
Salisbury, MD-DE	41540	Full-Scope	Entire MSA
St. Louis, MO-IL			
St. Louis, MO-IL	41180	Full-Scope	Entire MSA
Washington-Arlington-Alexandria DC-VA-MD-WV			
Washington-Arlington-Alexandria DC-VA-MD-WV	47900	Full-Scope	Entire MSA except Jefferson County, WV
Worcester, MA-CT			
Worcester, MA-CT	49340	Full-Scope	Entire MSA
ARIZONA			
Lake Havasu City-Kingman, AZ	29420	Full-Scope	Entire MSA
Phoenix-Mesa-Scottsdale, AZ	38060	Full-Scope	Entire MSA
Flagstaff, AZ	22380	Limited-Scope	Entire MSA
Prescott, AZ	39140	Limited-Scope	Entire MSA

Sierra Vista-Douglas, AZ	43420	Limited-Scope	Entire MSA
Tucson, AZ	46060	Limited-Scope	Entire MSA
Arizona Non-MSA		Limited-Scope	Apache county only
ARKANSAS			
Fayetteville-Springdale-Rogers, AR-MO	22220	Full-Scope	Entire MSA except McDonald County, MO
Little Rock-North Little Rock-Conway, AR	30780	Full-Scope	Entire MSA
Jonesboro, AR	27860	Limited-Scope	Entire MSA
Pine Bluff, AR	38220	Limited-Scope	Entire MSA
CALIFORNIA			
Fresno, CA	23420	Full-Scope	Entire MSA
Los Angeles-Long Beach-Anaheim, CA	31080	Full-Scope	Entire MSA
Riverside-San Bernardino-Ontario, CA	40140	Full-Scope	Entire MSA
San Francisco-Oakland-Hayward, CA	41860	Full-Scope	Entire MSA
Bakersfield, CA	12540	Limited-Scope	Entire MSA
Chico, CA	17020	Limited-Scope	Entire MSA
El Centro, CA	20940	Limited-Scope	Entire MSA
Hanford-Corcoran, CA	25260	Limited-Scope	Entire MSA
Madera, CA	31460	Limited-Scope	Entire MSA
Merced, CA	32900	Limited-Scope	Entire MSA
Modesto, CA	33700	Limited-Scope	Entire MSA
Napa, CA	34900	Limited-Scope	Entire MSA
Oxnard-Thousand Oaks-Ventura, CA	37100	Limited-Scope	Entire MSA
Redding, CA	39820	Limited-Scope	Entire MSA
Sacramento-Roseville-Arden-Arcade, CA	40900	Limited-Scope	Entire MSA
Salina, CA	41500	Limited-Scope	Entire MSA
San Diego-Carlsbad, CA	41740	Limited-Scope	Entire MSA
San Jose-Sunnyvale-Santa Clara, CA	41940	Limited-Scope	Entire MSA
San Luis Obispo-Paso Robles-Arroyo Grande, CA	42020	Limited-Scope	Entire MSA
Santa Cruz-Watsonville, CA	42100	Limited-Scope	Entire MSA
Santa Maria-Santa Barbara, CA	42200	Limited-Scope	Entire MSA
Santa Rosa, CA	42220	Limited-Scope	Entire MSA
Stockton-Lodi, CA	44700	Limited-Scope	Entire MSA
Vallejo-Fairfield, CA	46700	Limited-Scope	Entire MSA
Visalia-Porterville, CA	47300	Limited-Scope	Entire MSA
Yuba City, CA	49700	Limited-Scope	Entire MSA
California Non-MSA		Limited-Scope	Amador, Calaveras, Inyo, Lake, Lassen, Mendocino, Mono, Nevada, Tehama, and Tuolumne counties only
COLORADO			

Denver-Aurora-Lakewood, CO	19740	Full-Scope	Entire MSA
Boulder, CO	14500	Limited-Scope	Entire MSA
Colorado Non-MSA		Limited-Scope	Eagle County only
CONNECTICUT			
Bridgeport-Stamford-Norwalk, CT	14860	Full-Scope	Entire MSA
Hartford-West Hartford-East Hartford, CT	25540	Full-Scope	Entire MSA
New Haven-Milford, CT	35300	Limited-Scope	Entire MSA
Norwich-New London, CT	35980	Limited-Scope	Entire MSA
Connecticut Non-MSA		Limited-Scope	Litchfield County only
DELAWARE			
Dover, DE	20100	Full-Scope	Entire MSA
FLORIDA			
Jacksonville, FL	27260	Full-Scope	Entire MSA
Miami-Fort Lauderdale-West Palm Beach, FL	33100	Full-Scope	Entire MSA
North Port-Sarasota-Bradenton, FL	35840	Full-Scope	Entire MSA
Cape Coral-Fort Myers, FL	15980	Limited-Scope	Entire MSA
Crestview-Fort Walton Beach-Destin, FL	18880	Limited-Scope	Entire MSA
Deltona-Daytona Beach-Ormond Beach, FL	19660	Limited-Scope	Entire MSA
Gainesville, FL	23540	Limited-Scope	Entire MSA
Homosassa Springs, FL	26140	Limited-Scope	Entire MSA
Lakeland-Winter Haven, FL	29460	Limited-Scope	Entire MSA
Naples-Immokalee-Marco Island, FL	34940	Limited-Scope	Entire MSA
Ocala, FL	36100	Limited-Scope	Entire MSA
Orlando-Kissimmee-Sanford, FL	36740	Limited-Scope	Entire MSA
Palm Bay-Melbourne-Titusville, FL	37340	Limited-Scope	Entire MSA
Pensacola-Ferry Pass-Brent, FL	37860	Limited-Scope	Entire MSA
Port St. Lucie, FL	38940	Limited-Scope	Entire MSA
Punta Gorda, FL	39460	Limited-Scope	Entire MSA
Sebastian-Vero Beach, FL	42680	Limited-Scope	Entire MSA
Sebring, FL	42700	Limited-Scope	Entire MSA
Tallahassee, FL	45220	Limited-Scope	Entire MSA
Tampa-St. Petersburg-Clearwater, FL	45300	Limited-Scope	Entire MSA
The Villages, FL	45540	Limited-Scope	Entire MSA
Florida Non-MSA		Limited-Scope	De Soto, Madison, Monroe, Okeechobee, Putnam counties
GEORGIA			
Athens-Clark County, GA	12020	Full-Scope	Entire MSA
Atlanta-Sandy Springs-Roswell, GA	12060	Full-Scope	Entire MSA
Brunswick, GA	15260	Limited-Scope	Entire MSA

Columbus, GA-AL	17980	Limited-Scope	Entire MSA except Russell County, AL
Dalton, GA	19140	Limited-Scope	Entire MSA
Gainesville, GA	23580	Limited-Scope	Entire MSA
Macon-Bibb County, GA	31420	Limited-Scope	Entire MSA
Savannah, GA	42340	Limited-Scope	Entire MSA
Valdosta, GA	46660	Limited-Scope	Entire MSA
Warner Robins, GA	47580	Limited-Scope	Entire MSA
Georgia Non-MSA		Limited-Scope	Bulloch, Camden, Troup, Wayne counties
IDAHO			
Coeur d'Alene, ID	17660	Full-Scope	Entire MSA
ILLINOIS			
Chicago-Naperville-Elgin, IL-IN-WI	16980	Full-Scope	Entire MSA except Kenosha, WI
Rockford, IL	40420	Limited-Scope	Boone and Winnebago counties
IOWA			
Des Moines-West Des Moines, IA	19780	Full-Scope	Entire MSA
KANSAS			
Topeka, KS	45820	Full-Scope	Entire MSA
Wichita Falls, KS	48660	Full-Scope	Entire MSA
Lawrence, KS	29940	Limited-Scope	Entire MSA
Manhattan, KS	31740	Limited-Scope	Entire MSA
MAINE			
Portland-South Portland, ME	38860	Full-Scope	Entire MSA
Maine Non-MSA		Limited-Scope	Waldo County
MARYLAND			
Baltimore-Columbia-Towson, MD	12580	Full-Scope	Entire MSA
California-Lexington Park, MD	15680	Limited-Scope	Entire MSA
Maryland Non-MSA		Limited-Scope	Dorchester and Talbot counties
MASSACHUSETTS			
Springfield, MA	44140	Full-Scope	Entire MSA
Barnstable Town, MA	12700	Limited-Scope	Entire MSA
Massachusetts Non-MSA		Limited-Scope	Dukes, Franklin, and Nantucket counties
MICHIGAN			
Detroit-Warren-Dearborn, MI	19820	Full-Scope	Entire MSA
Ann Arbor, MI	11460	Limited-Scope	Entire MSA
Grand Rapids-Wyoming, MI	24340	Limited-Scope	Entire MSA
Lansing-East Lansing, MI	29620	Limited-Scope	Entire MSA
MINNESOTA			

Minneapolis-St. Paul-Bloomington, MN-WI	33460	Full-Scope	Entire MSA except Pierce County, WI and St. Croix County, WI
MISSOURI			
Springfield, MO	44220	Full-Scope	Entire MSA
Columbia, MO	17860	Limited-Scope	Entire MSA
Missouri Non-MSA		Limited-Scope	Howell and Phelps counties
NEVADA			
Las Vegas-Henderson-Paradise, NV	29820	Full-Scope	Entire MSA
Reno, NV	39900	Full-Scope	Entire MSA
Carson City, NV	16180	Limited-Scope	Entire MSA
Nevada Non-MSA		Limited-Scope	Douglas, Lyon, and Nye counties
NEW HAMPSHIRE			
Manchester-Nashua, NH	31700	Full-Scope	Entire MSA
New Hampshire Non-MSA		Limited-Scope	Cheshire, Grafton, and Merrimack counties
NEW JERSEY			
Atlantic City-Hammonton, NJ	12100	Full-Scope	Entire MSA
Trenton, NJ	45940	Full-Scope	Entire MSA
Ocean City, NJ	36140	Limited-Scope	Entire MSA
Vineland-Bridgeton, NJ	47220	Limited-Scope	Entire MSA
NEW MEXICO			
Albuquerque, NM	10740	Full-Scope	Entire MSA
New Mexico Non-MSA		Full-Scope	McKinley County
Farmington, NM	22140	Limited-Scope	Entire MSA
Las Cruces, NM	29740	Limited-Scope	Entire MSA
Santa Fe, NM	42140	Limited-Scope	Entire MSA
NEW YORK			
Buffalo-Cheektowaga-Niagara Falls, NY	15380	Full-Scope	Entire MSA
Kingston, NY	28740	Full-Scope	Entire MSA
Syracuse, NY	45060	Full-Scope	Entire MSA
Albany-Schenectady-Troy, NY	10580	Limited-Scope	Entire MSA
Ithaca, NY	27060	Limited-Scope	Entire MSA
Rochester, NY	40380	Limited-Scope	Entire MSA
Utica-Rome, NY	46540	Limited-Scope	Entire MSA
New York Non-MSA		Limited-Scope	Genesee County
NORTH CAROLINA			
Greensboro-High Point, NC	24660	Full-Scope	Entire MSA
Jacksonville, NC	27340	Full-Scope	Entire MSA
Raleigh, NC	39580	Full-Scope	Entire MSA
Asheville, NC	11700	Limited-Scope	Entire MSA

Burlington, NC	15500	Limited-Scope	Entire MSA
Durham-Chapel Hill, NC	20500	Limited-Scope	Entire MSA
Fayetteville, NC	22180	Limited-Scope	Entire MSA
Greenville, NC	24780	Limited-Scope	Entire MSA
Hickory-Lenoir-Morganton, NC	25860	Limited-Scope	Entire MSA
New Bern, NC	35100	Limited-Scope	Entire MSA
Wilmington, NC	48900	Limited-Scope	Entire MSA
Winston-Salem, NC	49180	Limited-Scope	Entire MSA
North Carolina Non-MSA		Limited-Scope	Avery, Beaufort, McDowell, Macon, Moore, Polk, Vance, Watauga, and Wilkes counties
OHIO			
Cleveland-Elyria, OH	17460	Full-Scope	Entire MSA
Cincinnati, OH-KY-IN	17140	Limited-Scope	Entire MSA except Dearborn, Ohio, and Union counties in Indiana and Boone, Bracken, Campbell, Gallatin, Grant, Kenton, and Pendleton counties in Kentucky
OKLAHOMA			
Oklahoma City, OK	36420	Full-Scope	Entire MSA
Tulsa, OK	46140	Full-Scope	Entire MSA
Lawton, OK	30020	Limited-Scope	Entire MSA
Oklahoma Non-MSA		Limited-Scope	Cherokee County
OREGON			
Bend-Redmond, OR	13460	Full-Scope	Entire MSA
Eugene, OR	21660	Full-Scope	Entire MSA
Albany, OR	10540	Limited-Scope	Entire MSA
Corvallis, OR	18700	Limited-Scope	Entire MSA
Salem, OR	41420	Limited-Scope	Entire MSA
PENNSYLVANIA			
Pittsburgh, PA	38300	Full-Scope	Entire MSA
Scranton-Wilkes-Barre-Hazleton, PA	42540	Limited-Scope	Entire MSA
SOUTH CAROLINA			
Charleston-North Charleston, SC	16700	Full-Scope	Entire MSA
Columbia, SC	17900	Full-Scope	Entire MSA
Greenville-Anderson-Mauldin, SC	24860	Limited-Scope	Entire MSA
Hilton Head Island-Bluffton-Beaufort, SC	25940	Limited-Scope	Entire MSA
Spartanburg, SC	43900	Limited-Scope	Entire MSA
South Carolina Non-MSA		Limited-Scope	Cherokee, Georgetown, Oconee, and Orangeburg counties
TENNESSEE			

Memphis, TN-MS-AR	32820	Full-Scope	Entire MSA except Crittenden County, AR; and De Soto, Marshall, Tate, and Tunica counties in Mississippi
Nashville-Davidson-Murfreesboro-Franklin, TN	34980	Full-Scope	Entire MSA
Chattanooga, TN-GA	16860	Limited-Scope	Entire MSA except Catoosa, Dade, and Walker counties in Georgia
Clarksville, TN-KY	17300	Limited-Scope	Entire MSA except Christian and Trigg counties in Kentucky
Knoxville, TN	28940	Limited-Scope	Entire MSA
TEXAS			
Austin-Round Rock, TX	12420	Full-Scope	Entire MSA
Dallas-Fort Worth-Arlington, TX	19100	Full-Scope	Entire MSA
Houston-The Woodlands-Sugar Land, TX	26420	Full-Scope	Entire MSA
San Antonio-New Braunfels, TX	41700	Full-Scope	Entire MSA
Abilene, TX	10180	Limited-Scope	Entire MSA
Amarillo, TX	11100	Limited-Scope	Entire MSA
Beaumont-Port Arthur, TX	13140	Limited-Scope	Entire MSA
Brownsville-Harlingen, TX	15180	Limited-Scope	Entire MSA
College Station-Bryan, TX	17780	Limited-Scope	Entire MSA
Corpus Christi, TX	18580	Limited-Scope	Entire MSA
El Paso, TX	21420	Limited-Scope	Entire MSA
Killeen-Temple, TX	28660	Limited-Scope	Entire MSA
Laredo, TX	29700	Limited-Scope	Entire MSA
Lubbock, TX	31180	Limited-Scope	Entire MSA
McAllen-Edinburg-Mission, TX	32580	Limited-Scope	Entire MSA
Midland, TX	33260	Limited-Scope	Entire MSA
Odessa, TX	36220	Limited-Scope	Entire MSA
San Angelo, TX	41660	Limited-Scope	Entire MSA
Tyler, TX	46340	Limited-Scope	Entire MSA
Victoria, TX	47020	Limited-Scope	Entire MSA
Waco, TX	47380	Limited-Scope	Entire MSA
Wichita Falls, TX	48660	Limited-Scope	Entire MSA
Texas Non-MSA		Limited-Scope	Erath, Kerr, and Palo Pinto counties
VIRGINIA			
Charlottesville, VA	16820	Full-Scope	Entire MSA
Richmond, VA	40060	Full-Scope	Entire MSA
Blacksburg-Christiansburg-Radford, VA	13980	Limited-Scope	Entire MSA
Harrisonburg, VA	25500	Limited-Scope	Entire MSA
Lynchburg, VA	31340	Limited-Scope	Entire MSA

Virginia Beach-Norfolk-Newport News, VA-NC	47260	Limited-Scope	Entire MSA except Currituck County, NC
Virginia Non-MSA		Limited-Scope	Franklin City, Louisa, and Orange counties
WASHINGTON			
Bremerton-Silverdale, WA	14740	Full-Scope	Entire MSA
Seattle-Tacoma-Bellevue, WA	42660	Full-Scope	Entire MSA
Bellingham, WA	13380	Limited-Scope	Entire MSA
Kennewick-Richland, WA	28420	Limited-Scope	Entire MSA
Longview, WA	31020	Limited-Scope	Entire MSA
Mount Vernon-Anacortes, WA	34580	Limited-Scope	Entire MSA
Olympia-Tumwater, WA	36500	Limited-Scope	Entire MSA
Spokane-Spokane Valley, WA	44060	Limited-Scope	Entire MSA
Yakima, WA	49420	Limited-Scope	Entire MSA
Washington Non-MSA		Limited-Scope	Island, Lewis, Mason, and Whitman counties

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS - BANK OF AMERICA, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Rating
BANK OF AMERICA, N.A.	Outstanding	Outstanding	High Satisfactory	Outstanding
Multistate Metropolitan Area (MA):				
Allentown-Bethlehem-Easton, PA-NJ	High Satisfactory	Outstanding	Outstanding	Outstanding
Augusta-Richmond County, GA-SC	High Satisfactory	Outstanding	Needs to Improve	Satisfactory
Boston-Cambridge-Newton, MA-NH	Outstanding	Outstanding	Low Satisfactory	Outstanding
Charlotte-Concord-Gastonia, NC-SC	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Kansas City, MO-KS	High Satisfactory	Outstanding	Outstanding	Outstanding
Myrtle Beach-Conway-North Myrtle Beach, SC-NC	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
New York-Newark-Jersey City, NY-NJ	Outstanding	Outstanding	High Satisfactory	Outstanding
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD	Outstanding	Outstanding	High Satisfactory	Outstanding
Portland-Vancouver-Hillsboro, OR-WA	Outstanding	Outstanding	Outstanding	Outstanding
Providence-Warwick, RI-MA	Outstanding	Outstanding	Outstanding	Outstanding
Salisbury, MD-DE	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
St. Louis, MO-IL	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Washington-Arlington-Alexandria DC-VA-MD-WV	Outstanding	Outstanding	Outstanding	Outstanding
Worcester, MA-CT	Outstanding	Outstanding	Outstanding	Outstanding
State:				
Arizona	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Arkansas	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
California	Outstanding	Outstanding	Outstanding	Outstanding
Colorado	Outstanding	Outstanding	Low Satisfactory	Outstanding
Connecticut	High Satisfactory	Outstanding	Outstanding	Outstanding
Delaware	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Florida	Outstanding	Outstanding	High Satisfactory	Outstanding
Georgia	Outstanding	High Satisfactory	Outstanding	Outstanding
Idaho	Outstanding	Outstanding	High Satisfactory	Outstanding
Illinois	Outstanding	Outstanding	High Satisfactory	Outstanding
Iowa	Outstanding	Outstanding	Outstanding	Outstanding
Kansas	High Satisfactory	Outstanding	Outstanding	Outstanding
Maine	High Satisfactory	Outstanding	Outstanding	Outstanding
Maryland	Outstanding	Outstanding	Outstanding	Outstanding
Massachusetts	Outstanding	Outstanding	High Satisfactory	Outstanding
Michigan	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Minnesota	Outstanding	Outstanding	Low Satisfactory	Outstanding

Missouri	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Nevada	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
New Hampshire	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
New Jersey	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
New Mexico	Outstanding	High Satisfactory	Outstanding	Outstanding
New York	Outstanding	Outstanding	High Satisfactory	Outstanding
North Carolina	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Ohio	Outstanding	Outstanding	Low Satisfactory	Outstanding
Oklahoma	High Satisfactory	Outstanding	Outstanding	Outstanding
Oregon	Outstanding	Outstanding	Outstanding	Outstanding
Pennsylvania	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
South Carolina	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Tennessee	Outstanding	High Satisfactory	Outstanding	Outstanding
Texas	Outstanding	Outstanding	Outstanding	Outstanding
Virginia	Outstanding	Outstanding	Outstanding	Outstanding
Washington	Outstanding	High Satisfactory	Outstanding	Outstanding

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

Appendix C: Market Profiles for Full-Scope Areas

Multistate MSA
Allentown-Bethlehem-Easton, PA-NJ MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Allentown-Bethlehem-Easton, PA-NJ MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	179	8.9	21.2	42.5	27.4	0.0
Population by Geography	821,173	7.8	20.1	40.4	31.6	0.0
Housing Units by Geography	338,833	7.4	21.6	42.3	28.7	0.0
Owner-Occupied Units by Geography	228,340	3.5	16.1	45.1	35.3	0.0
Occupied Rental Units by Geography	84,180	17.0	33.9	34.6	14.5	0.0
Vacant Units by Geography	26,313	10.2	30.1	42.7	17.1	0.0
Businesses by Geography	50,938	6.3	18.6	40.0	35.1	0.0
Farms by Geography	1,632	1.1	7.5	45.5	45.9	0.0
Family Distribution by Income Level	215,755	19.8	18.2	21.9	40.1	0.0
Household Distribution by Income Level	312,520	23.5	16.5	18.7	41.3	0.0
Median Family Income MSA - 10900 Allentown-Bethlehem-Easton, PA-NJ MSA		\$68,935	Median Housing Value			\$211,995
			Median Gross Rent			\$835
			Families Below Poverty Level			7.4%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Allentown-Bethlehem-Easton, PA-NJ MSA comprises Carbon, Lehigh, and Northampton counties in Pennsylvania and Warren County in New Jersey. As of June 30, 2016, BANA deposits in the MSA comprised approximately 0.1 percent of the total deposits of the bank.

Employment and Economic Factors

The Allentown-Bethlehem-Easton, PA-NJ MSA has a well-diversified economy. Key sectors of the economy include trade, transportation, and utilities; professional and business services; and government. Three of the top employers in the assessment area including their number of employees are Lehigh Valley Health Network (13,191), St. Luke's University Health Network (8,652), and Air Products and Chemicals (3,000).

Based on data from the Bureau of Labor Statistics, the January 2012 unemployment rate in the Allentown-Bethlehem-Easton, PA-NJ MSA was 8.5 percent. The unemployment rate in December 2016 fell to 4.6 percent.

Housing

The Census Bureau's American Community Survey (ACS) 5-year estimate for 2012-2016 reports the median housing value at \$200,000. According to the 2016 National Association of

Realtors Housing Affordability Index (HAI)⁴⁷ of 218, a family earning the median income has twice the income necessary to qualify for a conventional loan to purchase a median priced home. Based on the HAI index, housing affordability is not a primary issue for the assessment area.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Financial literacy/education
- Credit counseling

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Supporting non-profit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

⁴⁷ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors

Augusta-Richmond County, GA-SC MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Augusta-Richmond County, GA-SC MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	119	7.6	30.3	36.1	25.2	0.8
Population by Geography	564,873	5.5	27.6	37.6	29.2	0.0
Housing Units by Geography	237,384	6.4	29.1	36.3	28.1	0.0
Owner-Occupied Units by Geography	142,181	3.4	25.3	37.4	34.0	0.0
Occupied Rental Units by Geography	64,337	11.3	35.1	35.0	18.6	0.0
Vacant Units by Geography	30,866	10.4	34.3	34.4	20.9	0.0
Businesses by Geography	29,538	6.4	23.1	35.6	34.9	0.0
Farms by Geography	1,097	2.8	28.4	39.7	28.9	0.2
Family Distribution by Income Level	142,685	23.8	16.2	18.7	41.3	0.0
Household Distribution by Income Level	206,518	25.4	15.4	16.5	42.7	0.0
Median Family Income MSA - 12260 Augusta-Richmond County, GA-SC MSA		\$54,820	Median Housing Value			\$128,958
			Families Below Poverty Level			14.3%
			Median Gross Rent			\$671

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Augusta-Richmond County, GA-SC MSA comprises Burke, Columbia, Lincoln, McDuffie, and Richmond counties in Georgia and Aiken and Edgefield counties in South Carolina. As of June 30, 2016, BANA deposits in the MSA comprised less than 0.1 percent of the total deposits of the bank. The Augusta-Richmond County, GA-SC MSA is the second largest MSA in the state of Georgia after Atlanta and it is the 93rd largest in the U.S.

Employment and Economic Factors

The Augusta-Richmond County, GA-SC MSA has a well-diversified economy. The MSA, best known for hosting The Masters golf tournament each spring, brings in over 200,000 visitors from around the world. Membership in the Augusta National Golf Club is widely considered the most exclusive in the golf sport worldwide. The MSA is also home to Fort Gordon, a major army military base. The Augusta-Richmond County, GA-SC MSA is a regional center of medicine, biotechnology, and cyber security. In 2016, Fort Gordon announced plans to base the new National Cyber Security Headquarters in Augusta and bring up to 10,000-cyber security specialist to the area. Key sectors of the economy include government; trade, transportation, and utilities; and professional and business services. Major employers in the MSA include Fort Gordon (20,000 employees), Augusta University (4,700 employees), Richmond County School System (4,400 employees), Augusta-Richmond County (4,400 employees) and University Hospital (3,200 employees).

Based on data from the Bureau of Labor Statistics, the January 2012 unemployment rate in the Augusta-Richmond County, GA-SC MSA was 9.2 percent. The unemployment rate in December 2016 fell to 5.2 percent.

Housing

The Census Bureau's American Community Survey (ACS) 5-year estimate for 2012-2016 reports the median housing value at \$130,700. According to the 2010 U.S. Census, 60 percent of the housing units in the assessment area are owner-occupied, 27 percent are rentals, and 13 percent are vacant. Low-income census tracts have a greater proportion of rental housing than in moderate-, middle-, or upper-income geographies. Only 3.4 percent of the area's owner-occupied housing units are located in low-income census tracts.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Financial literacy/education
- Credit counseling

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Supporting non-profit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

Boston-Cambridge-Newton, MA-NH MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Boston-Cambridge-Newton, MA-NH MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,006	10.4	19.0	40.1	28.8	1.7
Population by Geography	4,552,402	8.6	18.7	42.9	29.7	0.1
Housing Units by Geography	1,866,582	8.3	19.4	44.1	28.3	0.0
Owner-Occupied Units by Geography	1,095,696	3.1	13.9	48.0	35.0	0.0
Occupied Rental Units by Geography	639,479	16.6	28.0	37.6	17.8	0.0
Vacant Units by Geography	131,407	11.5	23.3	42.6	22.6	0.0
Businesses by Geography	336,015	6.1	13.4	41.4	38.9	0.2
Farms by Geography	6,461	1.8	9.7	49.9	38.6	0.0
Family Distribution by Income Level	1,097,113	22.1	16.7	20.7	40.6	0.0
Household Distribution by Income Level	1,735,175	25.7	14.8	17.4	42.1	0.0
Median Family Income MSA - 15764 Cambridge-Newton-Framingham, MA MD		\$90,625	Median Gross Rent			\$1,146
Median Family Income MSA - 40484 Rockingham County-Strafford County, NH MD		\$85,547	Families Below Poverty Level			6.6%
Median Family Income MSA - 14454 Boston, MA MD		\$83,664	Median Housing Value			\$407,076

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Boston-Cambridge-Newton, MA-NH MSA comprises Norfolk, Plymouth, Suffolk, Middlesex, and Essex counties in Massachusetts and Rockingham and Strafford in New Hampshire. As of June 30, 2016, BANA deposits in the MSA comprised approximately 5 percent of the total deposits of the bank.

Employment and Economic Factors

The Boston-Cambridge-Newton, MA-NH MSA has a well-diversified economy. Key sectors of the economy include Education and Health Services, Government, Professional and Business Services and Finance. Major employers in the assessment area include Partners Healthcare, University of Massachusetts, Steward Health Care System, Beth Israel Deaconess Medical Center, and Sate Street Corp.

Based on data from the Bureau of Labor Statistics, the January 2012 unemployment rate in the Boston-Cambridge-Newton, MA-NH MSA was 6.6 percent. The unemployment rate in January 2016 fell to 2.5 percent.

Housing

The National Association of Realtors reports that the median price of a home in the Boston-Cambridge-Newton, MA-NH MSA at the end of 2015 was \$400,890, an increase from \$346,200 at the end of 2011. This increase reflects a continued rise in median home prices,

indicating housing affordability remains a significant issue in the assessment area. The 2016 Housing Affordability Index (HAI)⁴⁸ composite score for the MSA was 133.8. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Health literacy as evidenced by rise in obesity and chronic disease
- Living wage employment
- Financial literacy/education
- Credit counseling
- Checking accounts
- Crime prevention and youth activities

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Supporting non-profit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

⁴⁸ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Charlotte-Concord-Gastonia, NC-SC MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Charlotte-Concord-Gastonia, NC-SC MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	539	9.1	25.0	35.1	29.9	0.9
Population by Geography	2,217,012	7.0	23.7	37.2	32.0	0.1
Housing Units by Geography	908,629	7.5	25.1	36.6	30.9	0.0
Owner-Occupied Units by Geography	566,491	3.5	20.7	39.6	36.1	0.0
Occupied Rental Units by Geography	253,372	14.5	32.2	31.4	21.8	0.1
Vacant Units by Geography	88,766	12.2	32.2	31.8	23.8	0.0
Businesses by Geography	148,881	7.9	18.6	32.5	40.1	0.9
Farms by Geography	3,953	3.9	19.7	48.0	28.1	0.3
Family Distribution by Income Level	557,460	21.6	17.5	20.4	40.6	0.0
Household Distribution by Income Level	819,863	23.4	16.3	18.6	41.7	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$61,974	Median Housing Value			\$181,773
			Median Gross Rent			\$773
			Families Below Poverty Level			9.9%

*Source: 2010 U.S. Census and 2016 D&B Data
Due to rounding, totals may not equal 100.0*

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

The Charlotte-Concord-Gastonia, NC-SC MSA is a multistate MSA comprising Cabarrus, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, and Union counties in North Carolina and Chester, Lancaster, and York Counties in South Carolina. Mecklenburg County, with a 2016-estimated population of 1,054,835, is the most populous county in the MSA. The largest municipality in the MSA is the City of Charlotte, with an estimated population of 842,051. As of June 30, 2017, BANA deposits in the MSA fell slightly from 2011 to approximately 12.8 percent of the total deposits of the bank.

Employment and Economic Factors

Historically perceived as textile center, today the region is an acknowledged banking center. Today, the region is growing rapidly and adding jobs in insurance, IT, banking, and manufacturing. Construction jobs and retail service jobs have also expanded during the evaluation period. The area is home to a number of Fortune 500 corporations, including Bank of America, Family Dollar, Goodrich, Nucor, Sonic Automotive, and SPX. Smaller companies are just as important to the local economy. Entrepreneur and Fortune magazines have named the City of Charlotte as one of the nation's best large cities for entrepreneurs to start and operate a business.

Some of the largest employers in the region include American Tire Distributors Holdings, Bank of America, Carlisle Companies, Chiquita Brands, CommScope Holding Co., Curtiss-Wright Controls Corp., Domtar Corporation, Duke Energy Corporation, Family Dollar Stores, Lowe's Companies, SPX Corporation, and The Babcock & Wilcox Company, among others. The

Charlotte Douglas International Airport is also a major employer, with nearly 18,634 employees. The airport is the fifth busiest airport in the U.S. It also serves as the second largest hub for American Airlines. According to the Bureau of Labor Statistics, the unemployment rate in the MSA showed a marginal decreasing trend during the evaluation period. Unemployment fell from 10.4 percent in December 2011 to 3.8 percent in September 2017.

Housing

The National Association of Realtors details the increase in the median sales price of homes during the evaluation period. For 2017, the median sales price of a home in the MSA has increased to \$233,200 from \$211,100 during the second quarter of 2011. Luxury housing is on the rise, but affordable housing is becoming scarcer due to rising construction costs, rising land costs and elimination of local tax credits. The 2016 Housing Affordability Index (HAI)⁴⁹ composite score for the MSA was 183.1. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing financing and fund investment
- Financial education
- Workforce development funding
- Small business financing
- Multi-family affordable housing
- Financial Support of housing programs targeting low- and moderate-income persons
- Opportunities for participation by financial institutions include the following:
 - Working with local, statewide and regional CDFIs to offer community development
 - investments, loans and services
- Working with non-profits focused on community development activities
- Working with state government agencies focused on affordable housing for lending and investment opportunities

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Kansas City, MO-KS MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Kansas City, MO-KS MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	530	12.5	24.3	33.0	27.2	3.0
Population by Geography	2,009,342	7.8	22.9	37.6	31.8	0.0
Housing Units by Geography	862,148	9.3	25.3	36.9	28.6	0.0
Owner-Occupied Units by Geography	536,099	4.9	19.9	39.6	35.6	0.0
Occupied Rental Units by Geography	243,136	14.9	34.1	33.6	17.4	0.0
Vacant Units by Geography	82,913	20.7	34.3	29.0	16.1	0.0
Businesses by Geography	126,964	6.6	20.1	33.2	38.4	1.7
Farms by Geography	4,471	2.3	20.5	46.0	31.0	0.2
Family Distribution by Income Level	516,615	20.3	17.6	21.5	40.6	0.0
Household Distribution by Income Level	779,235	23.2	16.8	18.5	41.6	0.0
Median Family Income MSA – 28140 Kansas City, MO-KS MSA		\$68,846	Median Housing Value			\$160,015
			Median Gross Rent			\$772
			Families Below Poverty Level			8.0%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Kansas City, MO-KS MSA comprises Johnson, Leavenworth, Linn, Miami, and Wyandotte counties in Kansas and Bates, Caldwell, Cass, Clay, Clinton, Jackson, Lafayette, Platte and Ray counties in Missouri.

Employment and Economic Factors

The Kansas City, MO-KS MSA has a well-diversified economy. Key sectors of the economy include trade, transportation, utilities, professional and business services, and government. Three of the top employers in the assessment area including their number of employees are Cerner Corporation (14,444), Ford Motor Company Assembly Plant (7,320), and Hallmark Cards, Inc. (5,166).

Based on data from the Bureau of Labor Statistics, the August 2018 unemployment rate in the Kansas City, MO-KS MSA was 3.6 percent.

Housing

The Census Bureau’s American Community Survey (ACS) 5-year estimate for 2012-2016 reports the median housing value at \$135,900. However, the National Association of Realtors (NAR) reported the median much higher at \$215,000. The 2016 Housing Affordability Index (HAI)⁵⁰ composite score for the MSA was 235.9. The index measures affordability of housing

⁵⁰ Copyright 2017 “Affordability Index of Existing Single-Family Homes for Metropolitan Areas” National Association of Realtors.

for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1. The 2012-2016 Kansas City Consolidated plan reported there was a housing need for low-income families, as 70.5 percent of the housing stock was built between 1940-1979. The plan also indicated a high rate of abandoned and vacant housing stock.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Affordable construction loans
- Financial literacy/education
- Credit counseling
- Small business lending

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Supporting non-profit health providers and prevention
- Working with the area's community development corporation network. The 2012-2016 Kansas City Consolidated Plan listed this need. The Consolidated Plan specifically listed the following two CD corporations: Neighborhood Stabilization Program and the new Partnership Purchase Rehab Program
- Various state and local government partnership opportunities

Myrtle Beach-Conway-North Myrtle Beach, SC-NC-MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Myrtle Beach-Conway-North Myrtle Beach, SC-NC-MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	105	1.9	15.2	57.1	22.9	2.9
Population by Geography	376,722	1.7	16.4	60.8	21.1	0.0
Housing Units by Geography	252,321	1.4	13.4	59.5	25.6	0.0
Owner-Occupied Units by Geography	114,783	0.5	15.0	60.9	23.6	0.0
Occupied Rental Units by Geography	42,683	4.4	18.8	61.5	15.3	0.0
Vacant Units by Geography	94,855	1.2	9.2	57.0	32.7	0.0
Businesses by Geography	24,529	4.4	14.5	56.2	24.4	0.4
Farms by Geography	790	0.6	17.2	64.9	17.1	0.1
Family Distribution by Income Level	104,103	20.4	17.6	21.5	40.5	0.0
Household Distribution by Income Level	157,466	22.6	17.2	19.1	41.2	0.0
Median Family Income MSA – 34820 Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA		\$52,253	Median Housing Value			\$209,366
			Median Gross Rent			\$810
			Families Below Poverty Level			11.2%
<i>Source: 2010 U.S. Census and 2016 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>						

The Myrtle Beach-Conway-North Myrtle Beach, SC-NC-MSA comprises Horry and Georgetown counties in South Carolina and Brunswick County in North Carolina.

Employment and Economic Factors

The Myrtle Beach-Conway-North Myrtle Beach, SC-NC-MSA has a well-diversified economy. Key sectors of the economy include government, education, medical, accommodation and food service, entertainment, recreation and real estate rental and leasing. Seven of the top employers in the assessment area including their number of employees are Horry County School District (5,650), Walmart (2,800), Horry County Government (2,200), Coastal Carolina University (2,125), Conway Hospital (1,400), Grand Strand Regional Medical Center (1,350), and Food Lion (1,150).

Based on data from the Bureau of Labor Statistics, the August 2018 unemployment rate in the Myrtle Beach-Conway-North Myrtle Beach, SC-NC-MSA was 4.1 percent.

Housing

The Census Bureau’s American Community Survey (ACS) 5-year estimate for 2012-2016 reports the median housing value at \$173,600. However, the National Association of Realtors (NAR) reported the median much higher at \$222,600. The 2016 Housing Affordability Index

(HAI)⁵¹ composite score for the MSA was 167.8. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a cost of housing that is similar in comparison to the national average of 167.1.

The 2016-2020 Horry County Consolidated plan reported there was a housing need for owner-occupied rehabilitation for low-income families. Housing costs are highest in the central business districts of Myrtle Beach and North Myrtle Beach. The area relies heavily on seasonal tourism.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Small business lending
- Job creation

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Supporting non-profit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

⁵¹ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

New York-Newark-Jersey City, NY-NJ-PA

Table A - Demographic Information of the Assessment Area

Assessment Area: New York City-Newark-Nassau NY-NJ MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4,583	10.9	22.4	31.6	33.2	1.9
Population by Geography	19,112,843	11.2	23.2	30.1	35.3	0.2
Housing Units by Geography	7,529,108	10.3	22.4	30.4	36.9	0.0
Owner-Occupied Units by Geography	3,649,757	2.3	13.2	35.1	49.4	0.0
Occupied Rental Units by Geography	3,227,007	19.1	32.5	25.1	23.3	0.0
Vacant Units by Geography	652,344	11.2	24.3	29.7	34.8	0.0
Businesses by Geography	1,266,949	6.6	16.8	29.1	46.3	1.3
Farms by Geography	19,335	2.0	11.3	34.1	52.5	0.2
Family Distribution by Income Level	4,570,295	23.7	16.1	18.1	42.0	0.0
Household Distribution by Income Level	6,876,764	26.1	14.9	16.5	42.5	0.0
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY MD		\$101,543	Median Housing Value			\$479,662
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ MD		\$68,006	Families Below Poverty Level			10.0%
Median Family Income MSA - 35084 Newark, NJ-PA MD		\$90,123	Median Gross Rent			\$1,150

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The New York-Newark-Jersey City, NY-NJ-PA multistate MSA comprises multiple geographies in the states of New York, New Jersey, and Pennsylvania. There are four metropolitan divisions (MDs) within this MSA, including: New York-Jersey City-White Plains, NY-NJ; Newark, NJ-PA; NY; Nassau County-Suffolk County, NY; and Dutchess County-Putnam County. The New York-Jersey City-White Plains assessment area consists of the following counties: Bergen, NJ, Hudson, NJ, Middlesex, NJ, Monmouth, NJ, Ocean, NJ, Passaic, NJ, Bronx, NY, Kings, NY, New York, NY, Orange, NY, Queens, NY, Richmond, NY, Rockland, NY, and Westchester, NY. The Newark, NJ assessment area consists of Rockland NY, Westchester NY. The Nassau County-Suffolk County, NY assessment area consists of Nassau and Suffolk counties. The Newark, NJ assessment area consists of the following counties: Essex NJ, Hunterdon NJ, Morris NJ, Somerset, NJ, Sussex NJ, and Union NJ.

The MSA contains the principal cities of New York and White Plains in New York and Newark, Jersey City, and New Brunswick in New Jersey.

Employment and Economic Factors

New York City, the principal city in the MSA is the single largest regional urban economy in the country. NYC is home to a diversified mix of businesses including the headquarters of many national and international corporations. Historically, the downtown area of Manhattan (lower Manhattan) dominated the financial services industry, while midtown Manhattan has been home to advertising, publishing, and garment production. The retail sector is a major employer

along with health and social care, and finance and insurance. New York is also a major manufacturing center and shipping port, and it has a thriving technological sector. Among the largest employers are Northwell Health, JP Morgan Chase, Mount Sinai Hospital, Macy's, Citibank, New York-Presbyterian Healthcare System, Bank of America, Continuum Health Partners Inc., Verizon Communications, Montefiore Medical Center, NYU Langone Medical Center, New York University, and Columbia University. The unemployment rate is at an all-time low of 4.3 percent, although pockets of depressed employment remain.

Housing

The cost of living in the area is high and it affects borrowing ability. Housing affordability is a significant issue, along with a very low rental vacancy rate and crowding for large or doubled-up households. According to the National Association of Realtors as of December 2016, the median sales price of a single family home in the MSA was \$382,300. Based on information from the U.S. Census Bureau as of 2016, the median rent in the MSA was \$1,150. Housing costs in many communities are unaffordable for low and moderate-income households. Other significant issues across the MSA include homelessness and support services.

The 2016 Housing Affordability Index (HAI)⁵² composite score for the MSA was 119.6. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1.

Community Contacts

There are numerous opportunities in the area to participate in community development activities. Various well-established community development entities serve the area, including community development corporations, community development financial institutions (CDFIs), nonprofit entities, and governmental and quasi-governmental organizations focused on areas such as affordable housing, economic development, asset development and financial education, community services, and youth programs.

Community contacts identified the following credit and community development needs within this MSA:

- Affordable housing, particularly for the chronically homeless
- Higher paying jobs
- Foreclosure prevention assistance
- Affordable banking products
- Grants for operating, development, or programmatic support

Good opportunities exist to make community development investments and loans in the MSA. At least 39 CDFIs are actively operating in NYC. Most are large CDFIs and offer various community development opportunities.

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Opportunities for participation by financial institutions include the following:

- Working with various non-profits on affordable housing financing
- Grants to community development non-profit organizations
- Working with local government to assist low- and moderate-income individuals with affordable housing
- Small business lending
- Volunteer support for financial literacy

Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA

Table A - Demographic Information of the Assessment Area
Assessment Area: FS Philadelphia-Camden-Wilmington PA-NJ-DE-MD MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,433	7.3	23.1	38.1	30.2	1.3
Population by Geography	5,798,152	6.7	22.2	38.9	31.9	0.3
Housing Units by Geography	2,350,426	6.9	23.4	39.0	30.6	0.0
Owner-Occupied Units by Geography	1,501,593	3.5	18.7	42.3	35.5	0.0
Occupied Rental Units by Geography	653,871	12.1	31.5	34.0	22.3	0.1
Vacant Units by Geography	194,962	15.7	32.5	30.3	21.4	0.1
Businesses by Geography	404,498	3.9	17.2	38.0	40.4	0.5
Farms by Geography	8,529	1.1	13.7	46.0	39.1	0.1
Family Distribution by Income Level	1,405,606	21.1	17.5	21.0	40.5	0.0
Household Distribution by Income Level	2,155,464	24.6	15.7	17.8	41.9	0.0
Median Family Income MSA - 15804 Camden, NJ MD		\$83,092	Median Housing Value			\$248,577
Median Family Income MSA - 33874 Montgomery County-Bucks County-Chester County, PA		\$93,721	Median Gross Rent			\$941
Median Family Income MSA - 37964 Philadelphia, PA MD		\$54,139	Families Below Poverty Level			8.4%
Median Family Income MSA - 48864 Wilmington, DE-MD-NJ MD		\$76,834				
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA comprises New Castle County in Delaware; Cecil County in Maryland; Burlington, Camden, and Gloucester counties in New Jersey; and Bucks, Chester, Delaware, Montgomery, and Philadelphia counties in Pennsylvania. The bank has delineated its assessment area to include all of the MSA, except Cecil County, MD and Salem County, NJ.

Employment and Economic Factors

The Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA has a well-diversified economy. Key sectors of the economy include medical colleges, technology, health related businesses, trade, professional and business services, and government. Three of the top employers in the assessment area including their number of employees are University of Pennsylvania and Health System (33,000), Comcast Corporation (22,000), and Thomas Jefferson University and Jefferson Health (20,000).

Based on data from the Bureau of Labor Statistics, the August 2018 unemployment rate in the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA was 6 percent.

Housing

The Census Bureau's American Community Survey (ACS) 5-year estimate for 2012-2016 reports the median housing value at \$147,300. However, Realtor.com reports the median much higher at \$219,000. The 2016 National Association of Realtors' Housing Affordability Index (HAI)⁵³ composite score for the MSA was 207.6. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1. The 2017-2021 City of Philadelphia Consolidated Plan reported there was a housing need for low-income families. There is also a need for affordable rental units in the city.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Affordable construction loans
- Financial literacy/education
- Credit counseling
- Small business lending

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Supporting non-profit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

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Portland-Vancouver-Hillsboro, OR-WA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Portland-Vancouver-Hillsboro, OR-WA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	491	2.9	23.8	47.3	25.7	0.4
Population by Geography	2,226,009	2.7	23.7	48.2	25.4	0.0
Housing Units by Geography	909,973	2.8	23.6	48.7	24.9	0.0
Owner-Occupied Units by Geography	539,375	1.2	18.4	50.4	29.9	0.0
Occupied Rental Units by Geography	311,474	5.4	32.1	45.9	16.6	0.0
Vacant Units by Geography	59,124	3.5	25.7	47.4	23.4	0.0
Businesses by Geography	194,345	4.3	22.7	43.9	28.9	0.2
Farms by Geography	6,084	1.7	14.7	54.7	28.9	0.1
Family Distribution by Income Level	540,749	20.5	17.8	21.4	40.3	0.0
Household Distribution by Income Level	850,849	23.0	16.6	18.9	41.4	0.0
Median Family Income MSA – 38900 Portland-Vancouver-Hillsboro, OR-WA MSA		\$68,924	Median Housing Value			\$302,856
			Median Gross Rent			\$869
			Families Below Poverty Level			8.3%
<p>Source: 2010 U.S. Census and 2016 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.</p>						

The Portland-Vancouver-Hillsboro, OR-WA MSA comprises Clackamas, Columbia, Multnomah, Washington, and Yamhill counties in Oregon and Clark and Skamania counties in Washington. The portion of the MSA in the state of Oregon is the state's largest urban center while the portion in the state of Washington is its state's second largest urban center after Seattle. The 2017 American Community Survey estimates the population at 2.4 million, a 10 percent increase from the population estimate from the 2010 census.

Employment and Economic Factors

The Portland-Vancouver-Hillsboro, OR-WA MSA has a well-diversified economy. Key sectors of the economy include trade, scientific, tech services, manufacturing, healthcare and social assistance, professional and business services, and government. Five of the top employers in the assessment area including their number of employees are Intel (20,000), Providence Health & Services (18,286), Oregon Health & Science University (16,658), Kaiser Permanente (12,400), and Nike, Inc. (12,000).

Based on data from the Bureau of Labor Statistics, the August 2018 unemployment rate in the Portland-Vancouver-Hillsboro, OR-WA MSA was 3.8 percent.

Housing

The Census Bureau's American Community Survey (ACS) 5-year estimate for 2012-2016 reports the median housing value at \$319,400. However, the National Association of Realtors (NAR) reported the median housing value much higher at \$407,100. The 2016 Housing Affordability Index (HAI)⁵⁴ composite score for the MSA was 124. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1. The 2016-2020 City of Portland Consolidated Plan reported there was a need for affordable rental homes. Rental unit costs have increased an average of 8-9 percent over the past four years.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Low-income mortgage assistance
- Down-payment assistance
- Financial literacy/education
- Credit counseling

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Supporting non-profit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

⁵⁴ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Providence-Warwick, RI-MA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Providence-Warwick, RI-MA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	368	12.8	20.9	37.2	28.3	0.8
Population by Geography	1,600,852	10.4	19.2	38.8	31.6	0.0
Housing Units by Geography	690,006	11.2	19.1	39.8	30.0	0.0
Owner-Occupied Units by Geography	391,560	4.0	12.9	44.7	38.3	0.0
Occupied Rental Units by Geography	229,534	21.6	28.9	33.7	15.8	0.0
Vacant Units by Geography	68,912	17.2	21.6	31.8	29.4	0.0
Businesses by Geography	95,251	9.0	16.5	39.7	34.7	0.1
Farms by Geography	2,587	3.5	8.2	38.1	50.2	0.0
Family Distribution by Income Level	400,698	22.6	16.9	20.1	40.5	0.0
Household Distribution by Income Level	621,094	26.1	14.8	16.7	42.4	0.0
Median Family Income MSA – 39300 Providence-Warwick, RI-MA-MSA		\$70,496	Median Housing Value			\$301,214
			Median Gross Rent			\$854
			Families Below Poverty Level			8.5%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Providence-Warwick, RI-MA MSA comprises Bristol County in Massachusetts and Bristol, Kent, Newport, Providence, and Washington counties in Rhode Island. The 2017 American Community Survey estimates the population at 1.6 million, a small increase of approximately 1 percent since the 2010 census.

Employment and Economic Factors

The Providence-Warwick, RI-MA MSA has a well-diversified economy. Key sectors of the economy include trade, education services, healthcare, manufacturing, transportation, and utilities; professional and business services; and government. Three of the top employers in the assessment area including their number of employees are Lifespan Health Connection (14,000), Rhode Island Hospital (5,754), and Brown University (4,629). Woonsocket, Rhode Island is home to CVS's headquarters. CVS is a major employer for the state of Rhode Island and the nation.

Based on data from the Bureau of Labor Statistics, the December 2016 unemployment rate in the Providence-Warwick, RI-MA MSA was 4.2 percent.

Housing

The Census Bureau's American Community Survey (ACS) 5-year estimate for 2012-2016 reports the median housing value at \$173,800. However, the National Association of Realtors (NAR) reported the median much higher at \$294,700. The 2016 Housing Affordability Index

(HAI)⁵⁵ composite score for the MSA was 163.3. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1. The 2015-2019 City of Providence Consolidated Plan reported there was a housing need for affordable rental units and revitalization of substandard housing stock.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Financial literacy/education
- Credit counseling
- Small business lending
- Work force development

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Supporting non-profit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

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Salisbury, MD-DE MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Salisbury, MD-DE MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	96	1.0	15.6	62.5	17.7	3.1
Population by Geography	373,802	0.4	16.9	67.3	14.5	0.9
Housing Units by Geography	226,286	0.3	11.9	67.3	20.5	0.0
Owner-Occupied Units by Geography	107,182	0.0	12.2	70.1	17.6	0.0
Occupied Rental Units by Geography	35,207	1.5	26.4	62.9	9.2	0.0
Vacant Units by Geography	83,897	0.1	5.4	65.5	29.0	0.0
Businesses by Geography	25,594	0.3	14.5	65.3	19.8	0.1
Farms by Geography	1,387	0.1	12.5	77.1	10.0	0.3
Family Distribution by Income Level	94,694	20.0	18.7	21.8	39.5	0.0
Household Distribution by Income Level	142,389	22.7	17.0	19.2	41.1	0.0
Median Family Income MSA – 41540 Salisbury, MD-DE MSA		\$60,486	Median Housing Value			\$294,206
			Median Gross Rent			\$864
			Families Below Poverty Level			7.9%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Salisbury, MD-DE MSA comprises Sussex County in Delaware and Somerset, Wicomico, and Worcester counties in Maryland.

Employment and Economic Factors

The Salisbury, MD-DE MSA has a well-diversified economy. Key sectors of the economy include agriculture, healthcare, trade, transportation, and utilities; professional and business services; and government. Three of the top employers in the assessment area including their number of employees are Perdue Farms (22,000), Peninsula Regional Medical Center (2,900), and Salisbury University (1,800). The major industry in Wicomico County is Agriculture. It has 510 farms covering 83,739 acres.

Based on data from the Bureau of Labor Statistics, the December 2016 unemployment rate in the Salisbury, MD-DE MSA was 6.5 percent.

Housing

The Census Bureau's American Community Survey (ACS) 5-year estimate for 2012-2016 reports the median housing value at \$154,000. However, the National Association of Realtors (NAR) reported the median much higher at \$182,313. The 2014-2018 City of Salisbury Consolidated Plan reported there was a housing need for affordable homes to buy and rent. The plan includes a strategy to revitalize the downtown area.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Affordable construction loans
- Financial literacy/education
- Credit counseling
- Small business lending
- Job creation in the downtown area
- Down-payment assistance
- Revitalization projects in the downtown area

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Supporting non-profit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

St. Louis, MO-IL MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: St Louis, MO-IL MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	615	12.2	18.9	41.6	27.0	0.3
Population by Geography	2,787,701	7.6	17.6	44.3	30.5	0.0
Housing Units by Geography	1,216,571	8.6	19.3	44.1	27.9	0.0
Owner-Occupied Units by Geography	787,562	4.3	15.8	46.8	33.1	0.0
Occupied Rental Units by Geography	310,087	15.5	25.4	39.7	19.2	0.1
Vacant Units by Geography	118,922	19.5	26.3	38.0	16.1	0.2
Businesses by Geography	160,108	5.6	15.8	40.7	37.9	0.1
Farms by Geography	5,560	1.3	11.4	55.9	31.4	0.1
Family Distribution by Income Level	721,957	20.9	17.1	21.2	40.7	0.0
Household Distribution by Income Level	1,097,649	24.3	16.0	18.0	41.8	0.0
Median Family Income MSA - 41180 St. Louis, MO-IL MSA		\$66,798	Median Housing Value			\$170,376
			Median Gross Rent			\$733
			Families Below Poverty Level			8.6%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The St. Louis, MO-IL-MSA comprises Bond, Calhoun, Clinton, Jersey, Macoupin, Maddison, Monroe, and St. Clair counties in Illinois and Franklin, Jefferson, Lincoln, St. Charles, St Louis, Warren, and St. Louis City counties in Missouri.

Employment and Economic Factors

The St. Louis, MO-IL-MSA has a well-diversified economy. Key sectors of the economy include management of companies, manufacturing, healthcare, social assistance, trade, transportation, utilities, professional and business services, and government. Three of the top employers in the assessment area including their number of employees are BJC Health Systems (21,468), Boeing International Defense Systems (15,500), and Scott Air Force Base (12,600). St Louis is the headquarters for many Fortune 1000 and Fortune 500 companies. These include Anheuser-Busch Companies, Inc., Emerson Electric, May Department Stores, Monsanto Company, TALX, and Panera bread. Three of the major American automakers operate assembly plants in the area – General Motors, Chrysler, and Ford.

Based on data from the Bureau of Labor Statistics, the December 2016 unemployment rate in the St Louis, MO-IL MSA was 3.9 percent.

Housing

The Census Bureau's American Community Survey (ACS) 5-year estimate for 2012-2016 reports the median housing value at \$167,400. The 2016 Housing Affordability Index (HAI)⁵⁶ composite score for the MSA was 250.2. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

There is a need for loans to rehabilitate the housing stock. According to the 2015-2019 St Louis City Consolidated Plan, development of 73 percent of the housing stock occurred prior to 1950. There is also a need for code enforcement on these projects.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Financial literacy/education
- Credit counseling
- Small business lending
- Work force development

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Supporting non-profit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

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Washington-Arlington-Alexandria, DC-VA-MD-WV MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: FS Washington-Arlington-Alexandria DC-VA-MD MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,343	9.0	24.7	35.3	30.1	0.9
Population by Geography	5,582,734	8.1	24.3	36.6	30.8	0.2
Housing Units by Geography	2,180,556	8.6	25.2	36.2	30.0	0.0
Owner-Occupied Units by Geography	1,332,388	3.6	19.9	40.3	36.3	0.0
Occupied Rental Units by Geography	681,912	17.3	34.3	29.1	19.3	0.0
Vacant Units by Geography	166,256	13.8	30.1	32.2	23.9	0.0
Businesses by Geography	442,986	4.5	20.3	35.1	39.7	0.3
Farms by Geography	8,169	2.6	21.6	43.1	32.8	0.0
Family Distribution by Income Level	1,310,424	21.1	17.5	21.3	40.1	0.0
Household Distribution by Income Level	2,014,300	21.9	17.1	19.3	41.6	0.0
Median Family Income MSA - 43524 Silver Spring-Frederick-Rockville, MD MD		\$107,887	Median Housing Value			\$435,183
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV MD		\$100,486	Median Gross Rent			\$1,312
			Families Below Poverty Level			4.9%
<i>Source: 2010 U.S. Census and 2016 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>						

The Washington-Arlington-Alexandria, DC-VA-MD-WV MSA comprises the principal cities of Washington, DC; Arlington, VA; Alexandria, VA; Silver Spring, MD; Frederick, MD; Rockville, MD; Bethesda, MD; Gaithersburg, MD; and Reston, VA. BANA excludes Jefferson County, West Virginia from the bank's assessment area.

Employment and Economic Factors

The Washington-Arlington-Alexandria, DC-VA-MD-WV MSA has a well-diversified economy. Key sectors of the economy include biotechnology, defense contracting, and tourism. Major employers in the assessment area include MedStar Health, Inova Health System, Marriott International Inc., University of Maryland, College Park, Washington Metropolitan Area Transit Authority, Booz Allen Hamilton Inc., and Giant Food LLC.

Based on data from the Bureau of Labor Statistics, in January 2012, the unemployment rate in the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA was 6.3 percent. In December 2016, the unemployment rate decreased to 3.6 percent.

Housing

The National Association of Realtors reports that the median price of a single-family home at December 31, 2014 was \$381,800 for the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA. As of December 31, 2016, this value rose to \$390,600. Given the overall high median home price, housing affordability continues to be a significant issue in the assessment area.

The 2016 Housing Affordability Index (HAI)⁵⁷ composite score for the MSA was 159.3. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing is a top priority
- Access to capital for entrepreneurs through traditional banks and training resources
- Economic development and workforce development
- Need equity capital for CDFIs and loan pools
- Gentrification is one of the biggest issues affecting DC causing homeowners on fixed income and older businesses to be priced out

Opportunities for participation by financial institutions include the following:

- Lending and investment to expand the number of HUD housing counselors
- Lending and investment to provide access to credit and to help transition from renting to owning
- Supporting community development services such as financial literacy and technical assistance to small business owners
- Supporting CDFI network to help revamp small businesses and expand minority and women-owned small businesses

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Worcester, MA-CT MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Worcester, MA-CT MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	197	8.1	21.8	44.7	24.4	1.0
Population by Geography	916,980	6.8	18.9	45.2	28.7	0.4
Housing Units by Geography	372,425	7.5	21.0	45.4	26.1	0.0
Owner-Occupied Units by Geography	233,022	1.9	14.2	50.9	32.9	0.0
Occupied Rental Units by Geography	109,461	17.0	33.1	35.6	14.3	0.0
Vacant Units by Geography	29,942	16.1	29.3	38.5	16.1	0.0
Businesses by Geography	54,471	8.0	18.6	41.9	31.5	0.0
Farms by Geography	1,714	1.5	8.3	53.9	36.3	0.0
Family Distribution by Income Level	232,133	21.0	16.8	22.3	39.9	0.0
Household Distribution by Income Level	342,483	25.2	15.1	18.3	41.4	0.0
Median Family Income MSA - 49340 Worcester, MA-CT MSA		\$77,128	Median Housing Value			\$278,738
			Families Below Poverty Level			7.1%
			Median Gross Rent			\$854

Source: 2010 U.S. Census and 2016 D&B Data
Due to rounding, totals may not equal 100.0

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

The Worcester, MA-CT MSA comprises Windham County in Connecticut and Worcester County in Massachusetts.

Employment and Economic Factors

The Worcester, MA-CT MSA has a well-diversified economy. Key sectors of the economy include educational, health services, manufacturing, trade, transportation, utilities, professional and business services, and government. Four of the top employers in the assessment area including their number of employees are EMC Corporation (now part of Dell) (9,400), UMass-Memorial Health Care (12,906), UMass Medical school (4,400), and Hanover Insurance Group (4,900).

Based on data from the Bureau of Labor Statistics, the December 2016 unemployment rate in the Worcester, MA-CT MSA was 3.7 percent.

Housing

The Census Bureau's American Community Survey (ACS) 5-year estimate for 2012-2016 reports the median housing value at \$245,200. The 2016 Housing Affordability Index (HAI)⁵⁸ composite score for the MSA was 194.2. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to

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purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1

The 2015-2020 City of Worcester Consolidated plan reported there was a need for rehabilitation of many two and three family housing units, due to greater than 80 percent of this housing stock was built before 1940. Emerging industries require workforce training. There are plans for public and private investment in the downtown area, in the City of Worcester.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable rental housing
- Affordable for-sale housing
- Affordable construction loans
- Affordable housing for low-income families
- Rehabilitation of older homes for rental housing
- Financial literacy/education
- Credit counseling
- Small business lending
- Work force development

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing
- Lending and investment in economic development and workforce development
- Supporting community development services such as financial literacy
- Supporting non-profit health providers and prevention
- Working with the area's community development corporation network
- Various state and local government partnership opportunities

State of Arizona

Lake Havasu City-Kingman, AZ MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Lake Havasu City-Kingman, AZ MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	0.0	14.0	79.1	7.0	0.0
Population by Geography	200,186	0.0	11.3	83.0	5.8	0.0
Housing Units by Geography	108,396	0.0	10.8	82.5	6.7	0.0
Owner-Occupied Units by Geography	57,459	0.0	10.1	83.1	6.9	0.0
Occupied Rental Units by Geography	22,902	0.0	14.2	82.2	3.6	0.0
Vacant Units by Geography	28,035	0.0	9.6	81.4	9.0	0.0
Businesses by Geography	11,428	0.0	5.2	87.8	7.1	0.0
Farms by Geography	245	0.0	5.3	88.6	6.1	0.0
Family Distribution by Income Level	53,407	18.4	19.3	23.4	38.9	0.0
Household Distribution by Income Level	80,361	21.0	17.8	20.9	40.3	0.0
Median Family Income MSA - 29420 Lake Havasu City-Kingman, AZ MSA		\$47,530	Median Housing Value			\$175,295
			Median Gross Rent			\$801
			Families Below Poverty Level			11.6%
<p>Source: 2010 U.S. Census and 2016 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.</p>						

The Lake Havasu City-Kingman, AZ MSA comprises Mohave County. As of the 2010 census, the population of the MSA was 200,186, with a 2016-estimated population of 205,249. Between 2010 and 2015, the MSA averaged minimal growth of 0.4 percent, much lower than the state average of 1.4 percent. This limited growth makes the MSA one of the slower growing MSAs in the state.

Employment and Economic Factors

Employment rates in this area have seen improvement during the rating period. According to the Moody's Analytics report, this improvement is due to the increase in tourism in the MSA, which leads to more employment opportunities in the leisure/hospitality market. In addition, the MSA is experiencing growth among the retiree community leading to an increase in healthcare jobs. Top employers in the MSA according to Moody's include Kingman Regional Medical Center, Wal-Mart, Havasu Regional Medical Center, and Freeport-McMoRan Mine. As of December 31, 2016, the median family income in this MSA was \$47,530. Based on the Bureau of Labor statistics, the unemployment rate as of the same period was 6 percent. This percentage remains well above the state unemployment rate of 5 percent as of December 31, 2016.

Housing

The Census Bureau's American Community Survey (ACS) 5-year estimate for 2012-2016 reports the median housing value at \$208,800, which is slightly higher than the national average of \$205,000. According to the 2010 U.S. Census, 53 percent of the housing units in the assessment area are owner-occupied, 21 percent are rentals, and 26 percent are vacant.

Community Contacts

A review of the community contacts indicated that the following are identified needs within the community:

- Affordable Housing programs focusing on low-income and the senior population
- Financial Literacy Education for youth and young adults
- Leadership Development program for new young talent
- Workforce Development
- Neighborhood Revitalization program that will help invest in areas to keep young workers in the community

Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing and neighborhood revitalization/stabilization projects
- Supporting community development by providing educational programs such as financial literacy, leadership development, and drug/alcohol addiction

Phoenix-Mesa-Scottsdale, AZ MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Phoenix-Mesa-Scottsdale, AZ MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	991	9.2	24.5	33.9	31.4	1.0
Population by Geography	4,192,887	8.2	24.7	36.0	31.0	0.2
Housing Units by Geography	1,745,666	7.4	26.4	35.9	30.3	0.0
Owner-Occupied Units by Geography	1,008,811	3.7	21.5	38.1	36.8	0.0
Occupied Rental Units by Geography	492,017	14.1	34.3	32.3	19.3	0.0
Vacant Units by Geography	244,838	9.6	30.5	34.0	25.8	0.1
Businesses by Geography	328,447	6.5	15.9	30.8	46.3	0.5
Farms by Geography	6,597	5.5	17.1	34.5	42.4	0.4
Family Distribution by Income Level	1,000,063	21.2	17.8	20.5	40.6	0.0
Household Distribution by Income Level	1,500,828	22.6	17.1	18.5	41.7	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Scottsdale, AZ MSA		\$64,408	Median Housing Value			\$251,130
			Families Below Poverty Level			10.0%
			Median Gross Rent			\$934

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Phoenix-Mesa-Scottsdale, AZ MSA comprises Maricopa and Pinal counties. As of the 2010 census, the population of the MSA was 4.2 million, making it the 12th largest MSA in the nation by population. According to the U.S. Census Bureau, the 2016 population for the MSA was 4.6 million, making it one of the fastest growing metro areas in the country.

Employment and Economic Factors

Employment rates in this area have seen improvement during the rating period. As outlined on the Bureau Labor of Statistics website, the unemployment rate in the MSA declined from 8 percent in January 2012 to 4.1 percent in December 2016. The unemployment rate in the MSA as of December 2016 remains slightly lower than the state and national rates, which are 5 percent and 4.5 percent, respectively. Top employers in the MSA, according to the Moody's report, include Banner Health System, Fry's Food Stores, Wells Fargo, Arizona State University, Intel Corp, JPMorgan Chase, and American Airlines Group.

Housing

The 2016 Housing Affordability Index (HAI)⁵⁹ composite score for the MSA was 159. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the

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score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of the community contacts indicated that the following are identified needs within the community:

- Affordable Housing programs focusing on developing and sustaining affordable housing programs
- Affordable Rental Programs for low wage, full time workers
- Education programs with emphasis on reading at grade level
- Financial Literacy Education for youth and adults
- Hunger Relief Programs
- Workforce Development Programs
- Neighborhood stabilization and revitalization programs

Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing, affordable rental housing for low-wage earners and neighborhood revitalization/stabilization projects in low- and moderate-income and distressed areas
- Supporting community development by providing educational programs such as financial literacy, reading and comprehension literacy, leadership and workforce development, and homebuyer education and counseling programs
- Provide opportunities for food security to assist with hunger relief, as Arizona is one of the worst states in the U.S. for childhood hunger

State of Arkansas

Fayetteville-Springdale-Rogers, AR-MO MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Fayetteville-Springdale-Rogers, AR-MO MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	85	3.5	15.3	54.1	27.1	0.0
Population by Geography	440,121	3.9	15.3	54.4	26.4	0.0
Housing Units by Geography	182,052	4.8	14.2	54.6	26.4	0.0
Owner-Occupied Units by Geography	102,196	1.6	10.5	56.9	31.0	0.0
Occupied Rental Units by Geography	58,077	9.5	19.7	52.3	18.4	0.0
Vacant Units by Geography	21,779	6.7	17.0	50.5	25.9	0.0
Businesses by Geography	23,619	3.6	19.3	49.0	28.1	0.0
Farms by Geography	947	2.1	13.3	59.0	25.6	0.0
Family Distribution by Income Level	110,432	19.9	18.1	20.5	41.4	0.0
Household Distribution by Income Level	160,273	22.5	16.9	18.6	42.0	0.0
Median Family Income MSA - 22220 Fayetteville-Springdale-Rogers, AR-MO MSA		\$54,186	Median Housing Value			\$157,322
			Median Gross Rent			\$686
			Families Below Poverty Level			10.4%
<i>Source: 2010 U.S. Census and 2016 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>						

The Fayetteville-Springdale-Rogers, AR-MO MSA comprises Benton, Madison, and Washington counties in Arkansas and McDonald County in Missouri. BANA's assessment area delineation excludes McDonald County. The demographics and statistics reflect the MSA as a whole, unless otherwise noted. As of the 2010 census, the population in the MSA was 465,802, making it the 108th largest MSA in the nation by population. The population grew approximately 10 percent between 2010 and 2016 to 525,176 in 2016. The Census projects the population in the MSA to increase to 537,847 by 2020.

Employment and Economic Factors

Employment rates in this MSA have seen improvement during the evaluation period. According to the Bureau of Labor Statistics, the unemployment rate in the MSA declined from 6.5 percent in January 2012 to 2.7 percent in December 2016. The unemployment rate in December 2016 remains well below the state and national averages of 4.3 percent and 4.5 percent, respectively. According to the Moody's Analytical report, this improvement is due to the stability of the largest employer in the MSA, Wal-Mart. Other top employers in the area, according to Moody's, include University of Arkansas, Tyson Foods, Inc., J.B. Hunt Transport Services, Inc., and Washington Regional Medical Center.

Housing

The Census Bureau's American Community Survey (ACS) 5-year estimate for 2012-2016 reports the median housing value at \$151,800. Based on the ACS, total housing units have increased from 182,052 units in 2010 to 205,416 units in 2016. Approximately 91 percent of the housing units are occupied, 61 percent being owner-occupied and 39 percent being renter-occupied. Of the approximately 114,305 units that are owner-occupied, 66 percent of the units having existing mortgages.

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Affordable Housing programs for low-income families and those living just above the poverty line
- Community Service programs that offer basic needs such as food, public transportation, clothing, etc.
- Childcare programs that offer affordable childcare costs
- Financial Literacy programs for youth and adults
- Hunger Relief and Food Insecurity programs that support childhood hunger
- Veterans Support programs
- Workforce Development programs that are tailored to the diverse abilities within the community

Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing and affordable rental housing for low wage earners
- Supporting community development by providing educational programs such as financial literacy and workforce development
- Provide opportunities for food security to assist with hunger relief, especially for childhood hunger
- Supporting the community providing workers access to affordable childcare

Little Rock-North Little Rock-Conway, AR MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Little Rock-North Little Rock-Conway, AR MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	164	6.7	23.8	47.0	22.0	0.6
Population by Geography	699,757	5.0	20.6	47.4	27.0	0.0
Housing Units by Geography	301,038	5.5	21.8	47.0	25.8	0.0
Owner-Occupied Units by Geography	177,812	2.8	17.5	50.8	29.0	0.0
Occupied Rental Units by Geography	92,228	9.6	27.2	40.9	22.4	0.0
Vacant Units by Geography	30,998	8.7	30.6	43.2	17.4	0.0
Businesses by Geography	44,755	4.6	25.0	40.8	29.6	0.0
Farms by Geography	1,497	2.1	21.8	49.0	27.1	0.0
Family Distribution by Income Level	180,045	21.4	17.9	20.5	40.2	0.0
Household Distribution by Income Level	270,040	23.8	16.3	18.2	41.8	0.0
Median Family Income MSA - 30780 Little Rock-North Little Rock-Conway, AR MSA		\$58,911	Median Housing Value			\$135,687
			Families Below Poverty Level			10.7%
			Median Gross Rent			\$704

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Little Rock-North Little Rock-Conway, AR MSA comprises Faulkner, Grant, Lonoke, Perry, Pulaski, and Saline counties. According to the U.S. Census Bureau, the 2016 population increased to 730,107.

Employment and Economic Factors

Employment rates in this MSA have improved dramatically during the rating period. According to the Bureau of Labor Statistics, the unemployment rate in the MSA declined from 7.4 percent in January 2012 to 3.3 percent in December 2016. The unemployment rate in the MSA remains below the national and state average of 4.7 percent and 3.9 percent, respectively. The professional services, healthcare, and governmental services are the most prominent industries in the MSA and expected to continue to boost growth. Some of the largest employers include University of Arkansas for Medical Sciences, Baptist Health, Little Rock Air Force Base, and Arkansas Children’s Hospital.

Housing

According to the National Association of Realtors (NAR), the average Housing Affordability Index (HAI)⁶⁰ for the MSA in 2016 was 256.2, which is higher than the national average HAI of

⁶⁰ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors

167.1. This difference indicates that homes in this MSA are more affordable for the typical family. According the NAR, the HAI measures whether or not a family earning the median family income could qualify for a mortgage loan on median priced home. As such, the higher the index, the more affordable the homes are in the area.

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Affordable housing for the low- and moderate-income population
- Financial Literacy Education for youth and adults
- Hunger Relief and Food Insecurity services
- Workforce Development programs
- Neighborhood Revitalization/Stabilization

Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing and neighborhood revitalization and stabilization projects
- Supporting community development by providing educational programs such as financial literacy and workforce development
- Provide opportunities for food security to assist with hunger relief, especially for elderly and childhood hunger

State of California

Fresno, CA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Fresno, CA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	199	11.1	28.1	25.6	34.2	1.0
Population by Geography	930,450	10.9	29.4	27.6	31.3	0.7
Housing Units by Geography	310,219	9.7	27.1	28.1	35.1	0.0
Owner-Occupied Units by Geography	156,132	5.0	20.8	27.7	46.5	0.0
Occupied Rental Units by Geography	127,704	15.2	34.9	29.2	20.7	0.0
Vacant Units by Geography	26,383	11.1	26.5	24.9	37.6	0.0
Businesses by Geography	43,531	9.6	23.5	26.0	40.7	0.2
Farms by Geography	3,040	4.9	29.8	34.1	31.3	0.0
Family Distribution by Income Level	205,821	24.7	16.0	17.1	42.1	0.0
Household Distribution by Income Level	283,836	25.3	15.7	16.6	42.4	0.0
Median Family Income MSA - 23420 Fresno, CA MSA		\$52,306	Median Housing Value			\$249,443
			Median Gross Rent			\$843
			Families Below Poverty Level			17.7%
<p>Source: 2010 U.S. Census and 2016 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.</p>						

The Fresno, CA MSA comprises Fresno County. According to the Census Bureau Fact Finder website, the total population in 2010 was 930,450 in the MSA. According to the U.S. Census Bureau, the 2016 population was 979,534.

Employment and Economic Factors

During the rating period, unemployment rates have fluctuated, but are declining. According to the Bureau of Labor Statistics (BLS), the unemployment rate in the MSA declined from 17.2 in January 2012 to 9.4 in December 2016. As of December 2016, the unemployment rates remain higher than the state and national rates, which are 5.2 percent and 4.5 percent, respectively. Per the BLS, major occupations in the MSA included Office and Administrative Support; Sales; Food Preparation and Serving; Farming, Fishing, and Forestry; and Education, Training, and Library. Some of the largest employers in the assessment area are Community Medical Center, Saint Agnes Medical Center, Ruiz Food Products, Inc., California State University – Fresno, and Kaiser Permanente.

Housing

According to the 2010 U.S. Census, 50 percent of the total housing units in the assessment area were owner occupied, and 41 percent were rental occupied units. The composition of

housing units in low-income census tracts is 5 percent owner-occupied, 15.2 percent renter-occupied, and 11.1 percent are vacant units. For units in moderate-income census tracts, 20.8 percent are owner-occupied, 34.9 percent are renter-occupied, and 26.5 percent are vacant units. Low- and moderate-income census tracts have the lowest levels of owner-occupied units and the highest level of rental and vacant units in the MSA. The median home price in the assessment area is \$249,443, according to data from the 2010 Census.

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Affordable housing financing and affordable mortgage lending
- Financial Literacy Education for youth and adults
- Homebuyer Education and Counseling programs for low- and moderate-income homebuyers
- Workforce Development programs
- Downtown and Neighborhood Revitalization/Stabilization

Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing given the need for high density, transit oriented, and affordable mixed use housing
- Supporting community development by providing educational programs such as financial literacy, homebuyer education, and workforce development
- Provide opportunities for the revitalization of the downtown areas as well as other neighborhoods in the MSA, specifically in the older and low- to moderate-income areas.

Los Angeles-Long Beach-Anaheim, CA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Los Angeles-Long Beach-Anaheim, CA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,929	8.4	28.2	28.0	34.1	1.4
Population by Geography	12,828,837	7.6	29.5	29.0	33.5	0.3
Housing Units by Geography	4,467,990	7.0	26.3	28.5	38.1	0.1
Owner-Occupied Units by Geography	2,151,123	2.4	17.4	29.9	50.3	0.0
Occupied Rental Units by Geography	2,051,269	11.5	35.5	27.4	25.5	0.1
Vacant Units by Geography	265,598	9.3	27.5	26.2	36.9	0.1
Businesses by Geography	935,564	6.0	20.0	27.3	45.5	1.2
Farms by Geography	9,779	3.6	19.4	29.0	47.4	0.6
Family Distribution by Income Level	2,869,560	23.6	16.6	18.1	41.7	0.0
Household Distribution by Income Level	4,202,392	24.8	15.8	17.0	42.4	0.0
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA MD		\$83,735	Median Housing Value			\$543,246
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA MD		\$61,622	Median Gross Rent			\$1,214
			Families Below Poverty Level			11.3%
<i>Source: 2010 U.S. Census and 2016 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>						

The Los Angeles-Long Beach-Anaheim, CA MSA comprises two metropolitan divisions (MDs): Los Angeles-Long Beach-Glendale, CA and Anaheim-Santa Ana-Irvine, CA. These MDs are comprised of two counties in CA, which are Orange and Los Angeles. According to U.S. Census Bureau, the 2016 total population of this MSA was 13.3 million. The MSA is projected to have a population of 14.2 million by 2020.

Employment and Economic Factors

Unemployment rates in the MSA have seen a significant drop during the rating period. According to the Bureau of Labor Statistics (BLS), the unemployment rate in the MSA declined from 11.1 in January 2012 to 4.4 in December 2016. As of December 2016, the MSA reported unemployment rates below that of the state and nation; reported as 5.2 percent and 4.5 percent, respectively. The BLS further shows that as of May 2016, major occupations in the MSA included Office and Administrative Support; Sales; Food Preparation and Serving; Transportation and Material Moving; Business and Financial Operations; and Education, Training, and Library. Some of the largest employers in the MSA include University of California (Los Angeles, Irvine, and Santa Barbara), Kaiser Permanente, Disneyland Resort, The Walt Disney Co., University of Southern California, and Northrop Grumman Corp.

Housing

According to the National Association of Realtors (NAR), the average Housing Affordability Index (HAI)⁶¹ for the Los Angeles-Long Beach-Glendale MD in 2016 was 73.2. The HAI for the Anaheim-Santa Ana-Irvine MD was 67.1. The HAI for both MDs are significantly lower than the national average of 167.1. This difference indicates that homes in the area are much less affordable for the typical family. According the NAR, the HAI measures whether or not a family earning the median family income could qualify for a mortgage loan on a typical home at the national and regional levels based on the most recent monthly price and income data. As such, the higher the index, the more affordable the homes are in the area.

Community Contacts

Needs assessments for both MDs indicated the following identified needs within the community:

- Affordable housing and affordable rental housing
- Financial Literacy Education for adults
- Disability Support Services, including transportation services
- Homebuyer Education and Counseling programs for first time homebuyers
- Workforce Development programs
- Hunger Relief programs
- Neighborhood and environmental revitalization programs

Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing, to include rental housing
- Supporting community development by providing educational programs such as financial literacy, homebuyer education, and workforce development
- Supporting the community by providing services to the elderly and disabled, to include transportation
- Provide opportunities for the revitalization of the neighborhood and environment

⁶¹ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Riverside-San Bernardino-Ontario, CA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Riverside-San Bernardino-Ontario, CA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	822	5.7	28.2	35.9	29.6	0.6
Population by Geography	4,224,851	5.7	26.4	35.4	32.1	0.3
Housing Units by Geography	1,474,437	5.3	26.6	36.9	31.2	0.0
Owner-Occupied Units by Geography	855,253	2.9	21.6	36.3	39.2	0.0
Occupied Rental Units by Geography	407,778	10.3	36.3	35.7	17.8	0.0
Vacant Units by Geography	211,406	5.2	27.9	42.0	24.9	0.0
Businesses by Geography	210,799	4.5	24.1	34.2	37.2	0.1
Farms by Geography	4,563	3.9	22.7	35.7	37.6	0.0
Family Distribution by Income Level	949,542	21.8	17.5	19.8	40.8	0.0
Household Distribution by Income Level	1,263,031	23.5	16.5	18.2	41.8	0.0
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA		\$63,176	Median Housing Value			\$317,566
			Families Below Poverty Level			10.9%
			Median Gross Rent			\$1,116

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Riverside-San Bernardino-Ontario, CA MSA comprises Riverside and San Bernardino counties. According to the U.S. Census Bureau, the 2016 population had grown to 4.5 million. The projected population for the area by 2020 is a total population of 4.7 million.

Employment and Economic Factors

According to Moody's, this MSA is one of the fastest growing areas in the economy, which is consistent with the decline in the unemployment rate. Per the Bureau of Labor Statistics (BLS), the unemployment rate in the MSA declined from 12.2 percent in January 2012 to 5.1 percent in December 2016. While the MSA's unemployment rate for December 2016 is in line with the 5.2 percent unemployment rate for the state, the MSA's rate remains slightly higher than the national average of 4.5 percent. The BLS further shows that as of May 2016, major occupations in the MSA included Office and Administrative Support; Transportation and Material Moving; Sales; Food Preparation and Serving; Education, Training, and Library; Production; and Healthcare. Some of the largest employers in the assessment area are Starter Brothers Markets, Arrowhead Regional Medical Center, U.S. Marine Corps Air Ground Combat Center, Fort Irwin, Wal-Mart Stores, Inc., and Loma Linda University.

Housing

According to the National Association of Realtors (NAR), the average Housing Affordability Index (HAI)⁶² for the MSA in 2016 was 112.3, which is lower than the national average of 167.1. This difference indicates that homes in this MSA are less affordable for the typical family. According the NAR, the HAI measures whether or not a family earning the median family income could qualify for a mortgage loan on a typical home at the national and regional levels based on the most recent monthly price and income data. As such, the higher the index, the more affordable the homes are in the area.

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Affordable housing and affordable rental housing
- Financial Literacy Education for adults
- Homebuyer Education and Counseling programs for first time homebuyers
- Workforce Development programs
- Hunger Relief programs
- Neighborhood stabilization programs

Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing, to include rental housing
- Supporting community development by providing educational programs such as financial literacy, homebuyer education, and workforce development
- Provide opportunities for the stabilization of the neighborhoods to achieve preservation

⁶² Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

San Francisco-Oakland-Hayward, CA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: San Francisco-Oakland-Hayward CA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	922	12.8	19.5	34.8	32.2	0.7
Population by Geography	4,082,982	11.9	19.8	36.5	31.8	0.0
Housing Units by Geography	1,616,919	12.4	19.0	36.0	32.6	0.0
Owner-Occupied Units by Geography	831,261	4.9	14.5	38.5	42.0	0.0
Occupied Rental Units by Geography	660,566	20.2	24.5	33.4	21.9	0.0
Vacant Units by Geography	125,092	21.5	19.6	32.9	25.9	0.0
Businesses by Geography	317,653	13.9	14.6	31.8	39.6	0.1
Farms by Geography	4,299	7.1	15.2	35.6	42.1	0.0
Family Distribution by Income Level	922,538	23.5	16.4	18.8	41.4	0.0
Household Distribution by Income Level	1,491,827	25.5	15.2	16.8	42.5	0.0
Median Family Income MSA - 36084 Oakland-Hayward-Berkeley, CA MD		\$88,024	Median Housing Value			\$638,015
Median Family Income MSA - 41884 San Francisco-Redwood City-South San Francisco, CA		\$93,987	Median Gross Rent			\$1,301
			Families Below Poverty Level			6.8%
<i>Source: 2010 U.S. Census and 2016 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>						

The San Francisco-Oakland-Hayward, CA MSA comprises two metropolitan divisions (MDs): San Francisco-Redwood City-South San Francisco, CA and Oakland-Hayward-Berkeley, CA. These MDs are comprised of four counties in CA, which are San Mateo, San Francisco, Alameda, and Contra Costa. According to the U.S. Census Bureau, the 2016 population in the MSA was 4.7 million.

Employment and Economic Factors

Unemployment rates in the MSA have dropped during the rating period. According to the Bureau of Labor Statistics (BLS), the unemployment rate in the MSA declined from 8.5 in January 2012 to 3.5 in December 2016. As of December 2016, the MSA reported unemployment rates below that of the state and nation, reported at 5.2 percent and 4.5 percent, respectively. The BLS further shows that as of May 2016, major occupations in the MSA included Office and Administrative Support; Sales; Food Preparation and Serving; Business and Financial Operations; Management Operations; and Computer and Mathematical. Some of the largest employers in the MSA include University of California (Santa Cruz and Berkeley), Safeway Inc., Kaiser Permanente, Stanford University, University of San Francisco, and Genentech Inc.

Housing

According to the National Association of Realtors (NAR), the average Housing Affordability Index (HAI)⁶³ for the MSA in 2016 was 69.5, which is significantly lower than the national average of 167.1. This difference indicates that homes in the area are significantly less affordable for the typical family. According to the NAR, the HAI measures whether or not a family earning the median family income could qualify for a mortgage loan on a typical home at the national and regional levels based on the most recent monthly price and income data. As such, the higher the index, the more affordable the homes are in the area.

Community Contacts

Needs assessments for both MDs indicated the following identified needs within the community:

- Affordable housing, affordable rental housing, and end gentrification
- Financial Literacy Education programs that support stability
- Workforce Development programs
- Neighborhood and environmental revitalization programs
- Crime Prevention Programs

Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing, to include rental housing
- Supporting community development by providing educational programs such as financial literacy and workforce development
- Supporting the community by providing services to support crime prevention
- Provide opportunities for the revitalization of the neighborhood

⁶³ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

State of Colorado

Denver-Aurora-Lakewood, CO MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Denver-Aurora-Lakewood, CO MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	621	11.1	22.5	33.5	31.7	1.1
Population by Geography	2,543,482	11.1	23.1	33.4	32.4	0.0
Housing Units by Geography	1,062,704	11.3	24.2	34.7	29.8	0.0
Owner-Occupied Units by Geography	650,428	6.3	19.1	36.1	38.5	0.0
Occupied Rental Units by Geography	328,371	20.0	33.0	32.1	14.9	0.0
Vacant Units by Geography	83,905	15.6	29.6	33.7	21.1	0.0
Businesses by Geography	268,070	8.4	20.1	30.9	40.3	0.3
Farms by Geography	5,263	7.0	17.6	35.5	39.8	0.1
Family Distribution by Income Level	620,203	21.9	17.1	20.3	40.7	0.0
Household Distribution by Income Level	978,799	23.6	16.5	18.2	41.6	0.0
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$75,101	Median Housing Value			\$266,191
			Families Below Poverty Level			8.6%
			Median Gross Rent			\$895

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Denver-Aurora-Lakewood, CO MSA comprises the following 10 counties: Adams, Arapahoe, Broomfield, Clear Creek, Elbert, Denver, Douglas, Gilpin, Jefferson, and Park. BANA has defined its assessment area to include all of the MSA, except the cities of Denver and Broomfield. Unless otherwise indicated, the demographics and statistics discussed reflect the MSA as a whole. According to the U.S. Census Bureau, the population of the MSA increased from 2.5 million in 2010 to 2.9 million in 2016.

Employment and Economic Factors

Employment rates in this MSA improved during the rating period. According to the Bureau of Labor Statistics, the unemployment rate in the MSA declined from 8.5 percent in January 2012 to 2.6 percent in December 2016. As of December 2016, the unemployment rate in the MSA is in line with the state average of 2.7 percent, but is significantly below the national average of 4.5 percent. Per the Bureau of Labor Statistics, as of May 2016, Office and Administrative Support, Sales, Food Preparation and Serving, Business and Financial Operations, and Transportation, Material Moving, and Healthcare occupations are the major occupations in the MSA. Some of the largest employers HealthONE, University of Colorado Hospital, Lockheed Martin Corp., Centura Health, and United Airlines.

Housing

According to the National Association of Realtors (NAR), the average Housing Affordability Index (HAI)⁶⁴ for the MSA in 2016 was 125.3, a decline of 5 percent from the previous year. The MSA's 2016 HAI is below the national average of 167.1, which indicates homes are less affordable for families earning the median income. According to the NAR, the HAI measures whether or not a family earning the median family income could qualify for a mortgage loan on a typical home at the national and regional levels based on the most recent monthly price and income data. As such, the higher the index, the more affordable the homes are in the area.

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Affordable housing for all population
- Financial Literacy Education for youth, adults, and veterans
- Hunger Relief and Food Insecurity services
- Workforce Development programs
- Neighborhood Revitalization/Stabilization and Transportation

Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing, including the construction of affordable housing, and neighborhood revitalization and stabilization projects
- Supporting community development by providing educational programs such as financial literacy and workforce development
- Provide opportunities for food security to assist with hunger relief, especially for elderly, children, and veterans.

⁶⁴ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

State of Connecticut

Bridgeport-Stamford-Norwalk, CT MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Bridgeport-Stamford-Norwalk, CT MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	210	15.7	17.6	31.9	34.8	0.0
Population by Geography	916,829	13.5	19.5	33.6	33.4	0.0
Housing Units by Geography	358,132	13.8	21.2	34.6	30.4	0.0
Owner-Occupied Units by Geography	234,419	5.2	15.9	40.3	38.6	0.0
Occupied Rental Units by Geography	97,363	31.3	33.6	23.2	12.0	0.0
Vacant Units by Geography	26,350	25.9	22.7	25.5	25.9	0.0
Businesses by Geography	93,239	10.4	16.5	32.5	40.6	0.0
Farms by Geography	2,513	9.0	18.7	35.7	36.5	0.0
Family Distribution by Income Level	230,561	22.7	16.7	20.0	40.7	0.0
Household Distribution by Income Level	331,782	25.6	15.2	17.0	42.2	0.0
Median Family Income MSA - 14860 Bridgeport-Stamford-Norwalk, CT MSA		\$100,593	Median Housing Value			\$503,921
			Median Gross Rent			\$1,235
			Families Below Poverty Level			5.6%
<p>Source: 2010 U.S. Census and 2016 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.</p>						

The bank has designated its assessment area as the Bridgeport-Stamford-Norwalk, CT MSA. The MSA comprises Fairfield County. The assessment area meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income geographies.

Employment and Economic Factors

Economic conditions, as reflected by the rate of unemployment, were strong during the evaluation period. According to the Bureau of Labor Statistics, the unemployment rate is declining in the MSA. As of December 2016, the unemployment rate for the Bridgeport-Stamford-Norwalk, CT MSA was 3.9 percent, reflecting a decrease from the 8.2 percent unemployment rate at the beginning of the 2012 evaluation period.

According to Moody's Analytics in the Bridgeport-Stamford-Norwalk, CT MSA, the persistent job losses and rising unemployment threaten to derail Bridgeport-Stamford-Norwalk's recovery. The Bridgeport area is the only metro area in Connecticut that has lost jobs over the past year. The MSA is a global financial center and has core professional services headquarters; above average exposures to high tech and has a highly educated workforce. Statistics also show a high cost of living, skewed income distribution in the Stamford area, and weak migration trends.

The top employment sectors in the Bridgeport-Stamford-Norwalk, CT MSA are manufacturing and trade, service producing industries, personal, business, and health services. Wholesale and retail trade continue to thrive in the area, due to its deep-sea port, interstate highways, and railroad hubs. Bridgeport is one of the largest financial centers in the New England area. Fairfield County is home to a dozen Fortune 500 Companies, which include General Electric, Pitney Bowes Inc., and Xerox Corporation. Top employers in the area are Peoples Bank, N.A., Deloitte, Charter Communications, Stamford Health, St. Vincent Medical Center, and Bridgeport Hospital.

Housing

According to the 2010 U.S. Census, 41.4 percent of the total housing units in the assessment area were owner occupied, and 32.6 percent were rental occupied units. The composition of housing units in low-income census tracts is 5.2 percent owner-occupied, 31.3 percent renter-occupied, and 25.9 percent are vacant units. For units in moderate-income census tracts, 15.9 percent are owner-occupied, 33.6 percent are renter-occupied, and 22.7 percent are vacant units. Low- and moderate-income census tracts have the lowest levels of owner-occupied units and the highest level of rental and vacant units in the MSA. The median home price in the assessment area is \$503,921, according to data from the 2010 Census Data.

The 2016 Housing Affordability Index (HAI)⁶⁵ composite score for the MSA was 159.4. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Affordable housing for homeowners and renters
- Down payment assistance for first-time homebuyers
- Assistance with lead remediation and energy efficiency upgrades for aging housing
- Rehabilitation loans for homeowners
- Direct loans and grants for small businesses to support general operating needs

Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing, including the construction of affordable housing, and neighborhood revitalization and stabilization projects
- Supporting community development by providing educational programs such as financial literacy and workforce development

⁶⁵ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Hartford-West Hartford-East Hartford, CT MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Hartford-West Hartford-East Hartford CT MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	290	15.9	14.5	39.3	28.3	2.1
Population by Geography	1,212,381	11.8	14.0	41.6	31.3	1.3
Housing Units by Geography	503,113	12.9	14.7	42.8	29.6	0.0
Owner-Occupied Units by Geography	323,477	3.6	11.1	46.7	38.6	0.0
Occupied Rental Units by Geography	145,575	29.6	22.4	35.9	12.1	0.0
Vacant Units by Geography	34,061	30.2	15.7	34.6	19.3	0.2
Businesses by Geography	88,017	9.3	11.0	41.8	37.5	0.4
Farms by Geography	2,678	2.8	6.8	43.6	46.7	0.0
Family Distribution by Income Level	310,244	21.4	17.0	22.1	39.6	0.0
Household Distribution by Income Level	469,052	24.7	15.6	17.9	41.7	0.0
Median Family Income MSA - 25540 Hartford-West Hartford-East Hartford, CT MSA		\$82,299	Median Housing Value			\$257,503
			Families Below Poverty Level			6.7%
			Median Gross Rent			\$921

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The bank has designated its assessment area as the Hartford-West Hartford-East Hartford, CT MSA. The MSA comprises Hartford, Middlesex, and Tolland counties. The assessment area meets the requirements of the CRA and does not arbitrarily exclude any low- and moderate-income geographies.

According to the U.S. Census data for 2016, the MSA population has remained relatively unchanged from 1.2 million in 2010. Low-income families represent 21.4 percent of families in the assessment area and moderate-income families represent 17 percent of the assessment area population. The percentage of households in the assessment area living below the federal poverty income level of \$24,250 was 6.7 percent for 2016, according to the Census Bureau's American Community Survey, the most recent data available. The household poverty rate for the assessment area was lower than the 9.8 percent for the state of Connecticut. The 2016 adjusted median family income of \$82,299 for the assessment area was greater than the median family income of \$71,346 for the state of Connecticut.

Employment and Economic Factors

Economic conditions, as reflected by the rate of unemployment, were strong during the evaluation period. According to the Bureau of Labor Statistics, the unemployment rate for the Hartford-West Hartford-East Hartford, CT MSA was 3.9 percent, reflecting a decrease from the 8.7 percent unemployment rate at the beginning of the 2012 evaluation period. The state of Connecticut's unemployment rate is higher than the Hartford MSA, at 4.4 percent.

According to Moody's Analytics, the Hartford-West Hartford-East Hartford, CT MSA economy is gaining steam, but the ongoing state budget impasse adds fragility to the area's recovery. Hartford has a well-educated workforce with above average wages. The workforce has high exposure to the state government.

Hartford is the capital city for the state of Connecticut. The top employment sectors in the Hartford-West Hartford-East Hartford, CT MSA are manufacturing, insurance services, education, supermarkets, gaming and resorts. The top employers are United Technologies, Lockheed Martin, Stop and Shop, Inc., Hartford Financial Services Group Inc., Yale University, and Foxwoods Resort Casino.

Housing

According to the 2010 U.S. Census, 23.7 percent of the total housing units in the assessment area were owner occupied, and 33.5 percent were rental occupied units. The composition of housing units in low-income CTs is 3.60 percent owner-occupied, 29.6 percent renter-occupied, and 30.2 percent vacant units. For units in moderate-income census tracts, 11.1 percent are owner-occupied, 22.4 percent renter-occupied, and 15.7 percent vacant units. The median home price in the assessment area is \$257,503, according to data from 2010 Census Data.

The 2016 Housing Affordability Index (HAI)⁶⁶ composite score for the MSA was 224. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Affordable and better quality housing
- Funding to help eliminate blight and crime
- Funding to renovate parks
- Financial literacy
- Job training and job placement

Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing, including the construction of affordable housing, and neighborhood revitalization and stabilization projects
- Supporting community development by providing educational programs such as financial literacy and workforce development
- Expand access to retail banking services by establishing more branches in low-income neighborhoods

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State of Delaware

Dover, DE MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Dover DE MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	15.6	68.8	15.6	0.0
Population by Geography	162,310	0.0	12.2	73.7	14.1	0.0
Housing Units by Geography	63,563	0.0	12.5	73.7	13.8	0.0
Owner-Occupied Units by Geography	41,836	0.0	9.2	75.3	15.5	0.0
Occupied Rental Units by Geography	15,560	0.0	20.0	70.9	9.2	0.0
Vacant Units by Geography	6,167	0.0	16.1	70.4	13.5	0.0
Businesses by Geography	9,325	0.0	21.2	64.5	14.3	0.0
Farms by Geography	575	0.0	8.3	77.2	14.4	0.0
Family Distribution by Income Level	40,711	18.7	18.4	23.3	39.6	0.0
Household Distribution by Income Level	57,396	22.6	17.1	20.3	40.0	0.0
Median Family Income MSA - 20100 Dover, DE MSA		\$60,949	Median Housing Value			\$204,861
			Median Gross Rent			\$917
			Families Below Poverty Level			9.3%
<i>Source: 2010 U.S. Census and 2016 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>						

The bank has designated its assessment area as the Dover, DE MSA. The MSA comprises Kent County. The assessment area meets the requirements of the CRA and does not arbitrarily exclude any low- and moderate-income geographies.

As detailed in the table above, the population in the assessment area was 162,310 according to the 2010 U.S. Census. Low-income families represent 18.7 percent of families in the assessment area. Moderate-income families represent 18.4 percent of the assessment area population. The percentage of households in the assessment area living below the federal poverty income level of \$24,250 was 9.3 percent for 2016, according to the Census Bureau's American Community Survey, the most recent data available. The household poverty rate for the assessment area was lower than the 11.7 percent for the state of Delaware. The 2016 adjusted median family income of \$60,949 for the assessment area was less than the median family income of \$73,831 for the state of Delaware.

Employment and Economic Factors

Dover is the capital city and the second largest city in the state of Delaware. Economic conditions, as reflected by the rate of unemployment, were strong during the evaluation period. According to the Bureau of Labor Statistics, the unemployment rate is declining in the MSA. As of December 2016, the unemployment rate for the Dover, DE MSA was 4 percent, reflecting a

decrease from the 8.3 percent unemployment rate at the beginning of the 2012 evaluation period.

According to Moody's Analytics, the economy has lost some of its luster. Payroll employment has fallen just over 3 percent in the last three months, compared with a more than 1 percent increase nationally. There are large swings in employment in the retail and leisure/hospitality segments. The area boasts an available and trainable labor force and a pool of skilled labor. The presence of Dover Airforce base offers stability for the area. Population growth is above average. There are low business and labor costs in an area with no general sales tax, no unitary tax, no fixtures tax, and no personal property or inventory tax.

The top employment sectors in the Dover, DE MSA are state and federal government, service producing industries, education, and health services. Dover is home to the Dover Air Force base, which offers the largest and busiest airfreight terminal in the Department of Defense. Top employers in the area are the State of Delaware, Dover Air Force Base, Christiana Care Health System, DuPont Company, Bank of America, N.A., Delaware State University, and University of Delaware.

Housing

According to the 2010 U.S. Census, 49.8 percent of the total housing units in the assessment area were owner-occupied and 32.3 percent were renter-occupied units. For units in moderate-income census tracts, 9.2 percent are owner-occupied, 20 percent are renter-occupied, and 16.1 percent are vacant units. The median home price in the assessment area is \$204,861, according to data from the 2010 Census Data.

The 2016 Housing Affordability Index (HAI)⁶⁷ composite score for the MSA was 190. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Affordable housing
- Supportive services for low- and moderate-income families
- Healthcare for the rising senior population
- Revitalization of older homes
- Support for homeless veterans

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Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing, including the construction of affordable housing, and neighborhood revitalization and stabilization projects
- Supporting community development by providing educational programs such as financial literacy and workforce development
- Investing in Downtown Development District Projects and the Strong Neighborhoods Housing Fund

State of Florida
Jacksonville, FL MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Jacksonville, FL MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	260	6.5	23.1	43.1	26.5	0.8
Population by Geography	1,345,596	4.6	19.2	46.4	29.8	0.0
Housing Units by Geography	587,486	5.0	20.6	45.4	29.0	0.0
Owner-Occupied Units by Geography	343,411	2.9	15.6	47.9	33.6	0.0
Occupied Rental Units by Geography	160,246	8.6	29.4	41.3	20.6	0.0
Vacant Units by Geography	83,829	7.0	23.7	42.9	26.4	0.0
Businesses by Geography	129,630	3.4	19.3	42.6	34.7	0.0
Farms by Geography	3,435	2.5	15.3	50.5	31.7	0.0
Family Distribution by Income Level	334,850	20.6	17.7	21.9	39.9	0.0
Household Distribution by Income Level	503,657	22.9	16.9	18.8	41.5	0.0
Median Family Income MSA - 27260 Jacksonville, FL MSA		\$63,927	Median Housing Value			\$211,536
			Families Below Poverty Level			9.0%
			Median Gross Rent			\$908

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Jacksonville, FL MSA comprises the following five counties: Baker, Clay, Duval, Nassau, and St. John. All five counties in this MSA are contiguous and located in northeastern Florida, bordering the state of Georgia and the Atlantic Ocean. According to the 2010 census, the population in the MSA totaled 1.3 million. The largest geographic subdivision within the MSA at the time of the 2010 census was the city of Jacksonville with a population of 822,000. Other large cities include St. Augustine, Fernandina Beach, Jacksonville Beach, Orange Park, Middleburg, Green Cove Springs, Macclenny, and St. Marys, GA. As of July 1, 2016, the population of the Jacksonville, FL MSA increased to an estimated 1.5 million.

Employment and Economic Factors

According to Moody's Analytics, the Jacksonville, FL MSA economy is stable, driven by defense, logistics, and financial centers. Employment in the MSA has steadily improved. Unemployment dipped to 3.7 percent, the lowest rate in more than a decade, and hourly wages topped the U.S. average for the first time since 2007, leading all other metropolitan areas in Florida. Defense payrolls remain an economic driver. Growth has been strong in high-income jobs in professional services, as well as retail and construction; however, leisure and hospitality performance declined due to reductions in hospitality-related jobs, compounded by historic flooding caused by Hurricane Irma in 2017.

Housing

The housing market in the assessment area is improving. House price appreciation is steadily increasing. House price appreciation exceeded the national averages since late 2014, and the gap continued to grow as of late 2017. House price appreciation, however, continues to lag state averages. In the Jacksonville, FL MSA, housing is more affordable than state averages, and it is comparable to national averages.

The 2016 Housing Affordability Index (HAI)⁶⁸ composite score for the MSA was 177.4. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts and local community development plans identified the following needs and/or challenges within the market:

- Rental assistance for the homeless, previously incarcerated individuals and low- and moderate-income individuals with low credit scores and/or a history of eviction
- “Second Chance” banking and credit opportunities
- Availability of affordable housing units
- Investor effect on housing availability

Opportunities for participation by financial institutions include the following:

- Funding for reserves to maintain affordable housing quality
- Grants for housing development and to fund supportive (wrap-around) services to low- and moderate-income families
- Grants for ongoing operational expenses of the nonprofit
- Construction financing for development projects
- Grants to fund emergency assistance programs for low- and moderate-income families
- Access to low cost checking accounts

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Miami-Fort Lauderdale-West Palm Beach, FL MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Miami-Fort Lauderdale-West Palm Beach, FL MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,216	5.8	25.9	33.3	32.8	2.1
Population by Geography	5,564,635	4.7	27.3	34.6	33.1	0.3
Housing Units by Geography	2,444,544	5.0	27.5	35.1	32.4	0.0
Owner-Occupied Units by Geography	1,329,038	2.1	23.1	36.3	38.6	0.0
Occupied Rental Units by Geography	690,566	10.1	36.7	33.5	19.7	0.0
Vacant Units by Geography	424,940	5.6	26.1	34.2	34.0	0.1
Businesses by Geography	764,572	3.4	21.8	30.3	43.7	0.9
Farms by Geography	11,984	3.0	22.7	31.6	42.5	0.3
Family Distribution by Income Level	1,317,377	22.4	17.3	18.9	41.3	0.0
Household Distribution by Income Level	2,019,604	24.5	16.1	17.0	42.4	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach, FL		\$62,619	Median Housing Value			\$284,593
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL MD		\$50,065	Median Gross Rent			\$1,099
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Delray Beach, FL MD		\$64,445	Families Below Poverty Level			11.0%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Miami-Fort Lauderdale-West Palm Beach, FL MSA comprises three metropolitan divisions (MDs), including the Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD, which consists of Broward County; the Miami-Miami Beach-Kendall, FL MD, which consists of Miami-Dade County; and the West Palm Beach-Boca Raton-Delray Beach, FL MD, which consists of Palm Beach County. All three counties in this MSA are contiguous and located in the south of Florida.

Principal cities in this MSA include Miami, Fort Lauderdale, West Palm Beach, Pompano Beach, Miami Beach, Boca Raton, Kendall, Deerfield Beach, Delray Beach, and Jupiter.

Overall, the MSA has a total population of approximately 5.5 million people. The Miami-Miami Beach-Kendall, FL MD is the largest of the MDs within the MSA, with an estimated 2016 population of 2.5 million, compared to an estimated population of 1.7 million for the Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD and an estimated population of 1.4 million for the West Palm Beach-Boca Raton-Delray Beach, FL MD.

The Miami, FL MD is a diverse and densely populated urban center. The greatest concentration of low-and moderate-income geographies in the MSA are located in the city of Miami. The cost of living in the Miami-Dade, FL MD remains high, even though there are indications of improvements in unemployment, real estate foreclosures, and other economic conditions during the evaluation period. Nearly 60 percent of the population growth in the

Miami-Dade County since 2010 has been from net in-migration, which has averaged 19,350 people annually.

Employment and Economic Factors

Following three years of decline, employment in the Miami area began to rebound in 2011 and continued to increase during the next several years. During the 12 months ending March 2016, nonfarm payrolls increased by 29,600 jobs, or 2.7 percent, from the previous 12 months to 1.13 million jobs. The unemployment rate decreased to 6 percent during this period, down from 6.7 percent during the previous 12 months. However, the unemployment rate in Miami-Dade remained higher than both the state of Florida and the national unemployment rate of 4.9 percent and 4.7 percent, respectively.

Major industries include real estate development, trade business with Latin America, and tourism. The largest employers include Miami-Dade County, Florida State Government, the University of Miami, Baptist Health System South Florida, and American Airlines.

According to Dun and Bradstreet, there were 354,431 non-farm businesses in the Miami-Dade, FL MD for 2015, of which 79.5 percent are small businesses, defined as having revenues of \$1 million or less. The majority (73.2 percent) of all non-farm businesses are concentrated in the county's middle-and upper-income geographies.

Housing

The housing crisis severely affected Miami-Dade County when home prices fell 50 percent or more from the highs of 2006 and condominium values declined 60 percent. Foreclosure rates have declined, but remain high. According to a report compiled by real estate research company ATTOM Data Solutions, one of every 786 housing units in South Florida was in some stage of foreclosure in November 2016. While that rate is still relatively high, it has fallen nearly 18 percent compared to November 2015. Miami-Dade County had the largest share of distressed properties with 1,479 homes in the foreclosure pipeline. Broward County came in second with 1,012 housing units and Palm Beach County had 657. While home values continue to recover, Zillow.com reports that, as of the second quarter of 2016, 11.8 percent of homes with mortgages were in a negative equity position, which limits the owners' opportunity for mortgage refinancing.

The high sales prices make it difficult for low- and moderate-income individuals to own a home in the assessment area without the help of loan subsidies. According to the National Association of Realtors, the median sales price for a single-family home in the Miami-Fort Lauderdale-West Palm Beach, FL MSA was \$260,000 in 2012 compared to \$305,000 thousand in 2016. Affordable housing inventory of units under \$250,000 have significantly declined during recent years due in part to a massive influx of foreign buyers. In addition, the high property taxes and the high cost of hazard and flood insurance in Florida add significant cost to owning a home. The decline in housing affordability is not limited to home buyers. A 2016 study from the Federal Reserve Bank of Atlanta found that Miami was one of several large Southern metropolitan areas that experienced a significant decline in the availability of low-cost rental housing from 2010 to 2014. These factors contribute to Miami-Dade County having some of the highest levels of housing cost burdens for families in the nation, spending

greater than 30 percent of income on housing. The National Low Income Housing Coalition found that 26 percent of moderate-income families and 71 percent of low-income families in the Miami MSA are severely housing cost burdened.

The 2016 Housing Affordability Index (HAI)⁶⁹ composite score for the MSA was 108.3. The index measures affordability of housing for a single family earning the median family income to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1.

Low-and moderate-income families have other challenges accessing homeownership, as private investors contribute to the overall decline in housing inventory, including affordable housing. These investors often buy homes with cash, making it difficult for low- and moderate-income individuals to take advantage of lower cost homes on the market. In 2014, as high as 58 percent of home sales in the Miami-Dade, FL MD were cash transactions. By mid-2016, this level declined, though still high at 48 percent of home sales.

Community Contacts

A review of community contacts and local community development plans indicated that the following are identified needs within the market:

- Affordable housing for renters and owners
- Homebuyer counseling
- Availability of affordable mortgage financing for low- and moderate-income individuals
- Job creation and career development
- Access to capital and credit for development activities that promote long-term economic and social viability of the community
- Establishment, stabilization and expansion of small businesses, including micro-enterprises
- Neighborhood revitalization
 - improving safety and livability of neighborhoods
 - increasing access to quality public and private facilities and services
 - reducing isolation of income groups through the spatial de-concentration of housing opportunities for persons of lower income
 - revitalizing deteriorating or deteriorated neighborhoods
 - restoring and preserving properties of significant historical, architectural, or aesthetic value
 - conserving energy resources

Opportunities for participation by financial institutions include the following:

- Grants to NFPs to support down payment assistance
- Partnering with NFPs to provide homebuyer education and financial counseling
- Affordable mortgage products

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North Port-Sarasota-Bradenton, FL MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: North Port-Sarasota-Bradenton, FL MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	172	2.3	24.4	45.3	27.9	0.0
Population by Geography	702,281	2.7	23.5	46.8	27.1	0.0
Housing Units by Geography	396,632	1.9	22.7	45.7	29.7	0.0
Owner-Occupied Units by Geography	228,050	1.3	20.1	49.0	29.7	0.0
Occupied Rental Units by Geography	72,159	5.1	31.1	44.1	19.7	0.0
Vacant Units by Geography	96,423	1.2	22.7	39.1	37.1	0.0
Businesses by Geography	82,910	1.5	20.5	42.5	35.5	0.0
Farms by Geography	2,402	1.7	17.9	46.7	33.8	0.0
Family Distribution by Income Level	188,229	19.6	19.0	20.9	40.5	0.0
Household Distribution by Income Level	300,209	22.3	17.3	19.0	41.4	0.0
Median Family Income MSA - 35840 North Port-Sarasota-Bradenton, FL MSA		\$60,626	Median Housing Value			\$266,801
			Median Gross Rent			\$1,013
			Families Below Poverty Level			7.7%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The North Port-Sarasota-Bradenton, FL MSA comprises Manatee County and Sarasota County. Both counties in this MSA are contiguous and located in southwestern Florida, bordering the Gulf of Mexico. According to the 2010 census, the population in the MSA totaled 702,281. The largest geographic subdivision within the MSA at the time of the 2010 census was the city of North Port with a population of 57,000. The largest cities include North Port, Sarasota, and Bradenton. As of July 1, 2016, the population of the North Port, FL MSA increased to an estimated 788,000. North Port remains the largest geographic subdivision with an estimated population of 64,000.

Employment and Economic Factors

According to Moody's Analytics, the North Port-Sarasota-Bradenton, FL MSA economy is improving, driven by tourism and retirees relocating to the area. U.S. wage growth will lead to increased discretionary spending and more households will travel on their vacations to coastal locales. Hotel construction will help satisfy increasing demand for leisure/hospitality and facilitate well above-average job growth in tourism-related industries in 2018. Baby boomers will feel the southward pull as more of them retire. Retiree spending will support consumer industries and housing, as well as healthcare. Senior citizens account for about half of all spending on medical services, and over the next decade, their share of the population will swell to 40 percent in the area, compared with 20 percent, nationwide. As a result, healthcare demand will soar, driving rising payrolls within the healthcare industry.

The North Port-Sarasota-Bradenton, FL MSA was one of the Florida metro areas hardest hit by hurricane Irma and the region is currently in a rebuilding stage. More than 62,000 individual applicants received approximately \$20 million in federal aid grants within Sarasota and Manatee counties, with more funding expected from federal, state, and local governments to help with recovery costs. As such, construction payroll growth could accelerate over the coming year. Economists expect industry payroll growth to continue post-recovery, with the continuation of large-scale development projects within the area.

At 4.6 percent, unemployment continues its five-year declining trend. Payroll employment is increasing with year-over-year growth that is twice the rest of Florida. The retail and hospitality industries, comprising nearly one-third of workers in the metro area, are expanding again following Hurricane Irma. While the education and healthcare industries lost momentum, job growth over the past year continues to exceed the statewide and U.S. averages.

Housing

The housing market in the assessment area is improving. House price appreciation is steadily increasing. House prices appreciated above national averages beginning in 2013 and the gap continues to grow to date. House prices are comparable to average in the state of Florida. In North Port-Sarasota-Bradenton, FL MSA, housing affordability is comparable to state average and it is lower than national average.

The 2016 Housing Affordability Index (HAI)⁷⁰ composite score for the MSA was 146. The index measures affordability of housing for a single family earning the median family income to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1

Community Contacts

A review of community contacts and local community development plans identified the following needs and/or challenges within the market:

- Low wages that are incommensurate with the high housing/rental costs
- Community development
- Financing programs

Opportunities for participation by financial institutions include the following:

- Purchasing packages of loans for Habitat for Humanity houses
- Financial literacy and education opportunities, such as budgeting, home ownership, wills, tips on being a good neighbor
- Volunteers for finance committees and event committees for local community service boards.

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State of Georgia
Athens-Clarke County, GA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Athens-Clarke County, GA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	17.4	17.4	39.1	26.1	0.0
Population by Geography	192,541	14.6	16.1	41.0	28.4	0.0
Housing Units by Geography	80,857	13.7	16.5	41.9	27.9	0.0
Owner-Occupied Units by Geography	39,494	4.9	11.1	47.9	36.1	0.0
Occupied Rental Units by Geography	27,772	24.4	21.5	33.5	20.6	0.0
Vacant Units by Geography	13,591	17.5	21.9	41.6	19.0	0.0
Businesses by Geography	12,394	16.2	11.1	36.0	36.6	0.0
Farms by Geography	618	3.6	9.2	52.3	35.0	0.0
Family Distribution by Income Level	40,689	24.5	16.1	18.1	41.2	0.0
Household Distribution by Income Level	67,266	27.4	14.2	15.2	43.2	0.0
Median Family Income MSA - 12020 Athens-Clarke County, GA MSA		\$57,573	Median Housing Value			\$170,828
			Families Below Poverty Level			13.6%
			Median Gross Rent			\$738

Source: 2010 U.S. Census and 2016 D&B Data
Due to rounding, totals may not equal 100.0

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

The Athens-Clarke County, GA MSA comprises the following four counties: Clarke, Madison, Oconee, and Oglethorpe. The principal city is Athens. The MSA is home to the University of Georgia, the nation’s oldest state-chartered university and the MSA’s largest employer. The MSA is located in the northeastern area of Georgia, approximately 71 miles east of metropolitan Atlanta.

Employment and Economic Factors

According to Moody’s Analytics, the area’s expansion is robust, with nearly all signals flashing green. At nearly 5 percent, annual job growth is second in the region. According to the Moody’s Analytics Business Cycle Tracker, the MSA has advanced at the fifth fastest rate among southern metropolitan areas over the past year. Job gains are relatively broad-based, but the core drivers are doing the heavy lifting. The public sector, led by faculty additions at the University of Georgia (UGA) and healthcare have contributed nearly two-thirds of net new jobs over the past year. A strong labor market is quickly absorbing labor force entrants, and the jobless rate has fallen below 4 percent for the first time in over a decade. Income growth is just ahead of the state average. As a result, the housing market is healthy, with house price appreciation more than a full percentage point above the strong Georgia average.

The area's cornerstone UGA remains the primary growth driver, creating jobs directly as rising enrollment necessitates faculty additions and indirectly as rising endowment funds more research and development opportunities. Though UGA's endowment is small compared with that of many similar universities, it is growing. Enrollment has grown by 9 percent in the past four years, setting another record in 2017. Rapidly rising enrollment has necessitated more staffing and state government payrolls are surging to record levels. The public sector, which accounts for nearly one-third of jobs, will remain a significant source of strength.

Buoyed by sound finances and solid demographics, hospitals will extend their recent run. Healthcare reasserted itself in 2017 after a few years marred by weak net hiring and uncertainty. Since early 2017, healthcare has contributed more than half of the net new jobs. The merger between Athens Regional Medical Center (ARMC) and Atlanta-based Piedmont Hospital inspired renewed confidence in ARMC and greatly improved ARMC's finances. As a result, ARMC is expanding (two new locations) and hiring staff. Robust population dynamics ensure that healthcare will expand more quickly in the metro area than the national average.

Notwithstanding the strength of the labor market, the MSA faces onerous structural problems. The huge presence of UGA leaves the economy vulnerable should funding or enrollment decline, and industrial diversity ranks near the bottom third of southern metro areas. Furthermore, while local business costs are low and educational attainment is high, few well-paying jobs await recent UGA graduates and most opt to relocate to Atlanta. Out-migration will hinder Athens's ability to attract new firms in high-value-added industries; therefore, the Athens MSA will only go as far as UGA will take it. The MSA will not be able to maintain its rapid growth for long but will maintain its momentum through 2018. Longer-term, an expanding UGA will provide stability, but the Athens MSA will be relegated to a below-average performer because of a dearth of dynamic economic drivers.

In addition to UGA, the metropolitan area's employers include ARMC-Piedmont Athens (Healthcare), St. Mary's (Healthcare), Clarke County School District, Pilgrim's Pride (Food Processing), Athens-Clarke County Government, Caterpillar, Dial America (Telemarketing), Power Partners, Baldor (Industrial Motors), Carrier Transicold, and Merial Animal Health Products.

Housing

According to the American Community Survey 2012-2016, the median housing value has declined to \$152,600 from \$170,828 reported at the 2010 Census. Approximately 38 percent of the area's housing units are owner-occupied and the median rent for renter-occupied units is \$799.

Community Contacts

A review of a community contact and local community development plans indicated that there is a high demand for access to credit by small businesses and permanent workforce residents. Opportunities for participation by financial institutions include the following:

- SBA and small business lending within the market
- Affordable mortgage programs for workforce housing for community residents

Atlanta-Sandy Springs-Roswell, GA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Atlanta-Sandy Springs-Roswell, GA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	951	9.8	24.6	34.7	30.4	0.5
Population by Geography	5,286,728	6.2	23.7	38.9	31.2	0.1
Housing Units by Geography	2,136,162	7.3	24.9	37.2	30.6	0.0
Owner-Occupied Units by Geography	1,276,774	2.8	18.7	41.1	37.4	0.0
Occupied Rental Units by Geography	603,757	14.1	35.0	30.8	20.1	0.0
Vacant Units by Geography	255,631	14.0	32.1	32.5	21.4	0.0
Businesses by Geography	460,413	4.7	21.4	34.9	38.9	0.1
Farms by Geography	8,861	2.7	20.0	43.7	33.5	0.1
Family Distribution by Income Level	1,282,154	21.8	17.1	19.6	41.5	0.0
Household Distribution by Income Level	1,880,531	23.0	17.0	18.3	41.7	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Roswell, GA MSA		\$67,374	Median Housing Value			\$210,023
			Median Gross Rent			\$919
			Families Below Poverty Level			9.6%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Atlanta-Sandy Springs-Roswell, GA MSA includes all twenty-nine counties within the entire MSA. The assessment area is located in the northwestern area of Georgia. Principal cities within the MSA include Alpharetta, Atlanta, Marietta, and Roswell.

Employment and Economic Factors

According to Moody's Analytics, the Atlanta-Sandy Springs-Roswell, GA MSA has experienced strong economic growth in the past 5 years, fueled by gains in health, professional and financial services, as well as construction. Nonfarm payrolls averaged 2.6 million jobs, an increase of 80,100 jobs, or 3.1 percent, compared with the number of jobs during the same 3-month period in 2015, resulting from growth in 10 of 11 sectors. That rate of job growth in the metropolitan area was much greater than the rate of 1.9 percent for the nation, and exceeded the increases in in other fast growing regions, including Houston, Miami, and Charlotte. Construction job growth has been particularly strong due to elevated demands for residential and office space. The MSA has also favorable business tax incentives, which have helped to attract multiple companies to the area over the years, including the entertainment industry.

In addition to being an important international transportation hub, the metropolitan area is home to the headquarters of corporations such as The Coca-Cola Company, Delta Air Lines, Inc., The Home Depot, and UPS (United Parcel Service, Inc.) and several notable colleges, including Emory University, the Georgia Institute of Technology, and Georgia State University.

Housing

During the 12 months ending March 2016, new home sales increased 20 percent to 16,400, continuing a trend that began in mid-2012. The number of existing homes sold has increased each year since 2012 to 101,000, despite a rapid decline in real estate owned (REO) sales. The percentage of home loans in the Atlanta metropolitan area that were seriously delinquent (90 or more days delinquent or in foreclosure) or had transitioned into REO status declined from 3.6 percent in March 2015 to 2.9 percent in March 2016. The current rate is slightly below the 3 percent rate for both Georgia and the nation.

Improving economic conditions and a declining number of REO properties have contributed to increased home prices in the Atlanta area since 2013. According to the National Association of Realtors, as of December 2016, the median sales price of a single family home in the MSA was \$184,000 compared to \$159,500 in 2014.

The 2016 Housing Affordability Index (HAI)⁷¹ composite score for the MSA was 215.9. The index measures affordability of housing for a single family earning the median family income to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Rental housing market conditions in the Atlanta metropolitan area currently are balanced, with relatively slow multifamily construction allowing for significant absorption of excess units in the early 2010s.

Community Contacts

A review of community contacts and local community development plans indicated that there is a high demand for access to credit for small businesses and homeowners.

Opportunities for participation by financial institutions include the following:

- SBA and small business lending within the market
- Affordable mortgage programs

⁷¹ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

State of Idaho

Coeur d'Alene, ID MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Coeur d Alene, ID MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	4.0	20.0	56.0	20.0	0.0
Population by Geography	138,494	3.5	13.2	67.5	15.9	0.0
Housing Units by Geography	61,173	4.2	14.4	65.3	16.1	0.0
Owner-Occupied Units by Geography	38,598	2.1	10.5	68.7	18.6	0.0
Occupied Rental Units by Geography	15,962	9.8	25.1	55.7	9.5	0.0
Vacant Units by Geography	6,613	3.2	10.9	68.7	17.3	0.0
Businesses by Geography	9,569	10.8	17.3	55.6	16.3	0.0
Farms by Geography	362	3.3	13.0	68.5	15.2	0.0
Family Distribution by Income Level	37,898	18.9	19.6	21.3	40.1	0.0
Household Distribution by Income Level	54,560	21.6	17.7	19.6	41.1	0.0
Median Family Income MSA - 17660 Coeur d'Alene, ID MSA		\$55,840	Median Housing Value			\$231,752
			Families Below Poverty Level			8.8%
			Median Gross Rent			\$771
<p>Source: 2010 U.S. Census and 2016 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.</p>						

The Coeur d'Alene, ID MSA comprises the city of Coeur d'Alene, ID and the county of Kootenai. The MSA is located in the northwestern area of Idaho, approximately 30 miles due east from Spokane, Washington. The city of Coeur D'Alene is a satellite city of Spokane. The two cities are the key components of the Spokane-CDA Combined Statistical Area of which Coeur D'Alene is the third-largest city followed by Spokane and Spokane Valley. The city of Coeur D'Alene is situated on the north shore of Lake Coeur d'Alene, 25 miles in length.

Employment and Economic Factors

According to Moody's Analytics, economic progress has slowed, but job growth over the last year (2016) outpaces the national average and the expansion is firmly entrenched. Robust retiree in-migration is the metro area's principal economic catalyst, creating demand for consumer-oriented services such as hospitality and healthcare, which have contributed strongly to net job creation since the start of 2017. The labor market has tightened and average hourly earnings are growing more than twice as fast as they are statewide. The housing market is thriving. House price appreciation is outpacing both the state and the national averages.

Healthcare will lead the next leg of the MSA's expansion. The low cost of living and scenic environment are driving retiree in-migration, ensuring a large patient base for medical

providers. Job growth in healthcare is forecast to more than double the U.S. average through the end of the decade. Kootenai Health is developing into a regional health-care hub. Nearly one-third of its patients come from outside the county, and increasing patient counts are fueling expansion plans. The hospital is building a lodging center for adult and pediatric patients receiving medical treatment from outside the county.

The outlook for leisure/hospitality is promising. First, there is good reason to believe that the industry is in even better shape than currently reported. Second, wage growth in the U.S. is set to accelerate as the economy approaches full employment, and with more cash in their pockets, consumers will spend more on recreation.

Top employers include Kootenai Health (3,000 employees), Hagadone Hospitality Company (1,850 employees), Qualfon, Inc. (1,253 employees), Willamette Dental Group (1,100 employees), CDA Tribal Casino (1,060 employees), and Northern Quest Resort & Casino (1,012 employees).

The area will kick into higher gear in 2018 and stay a step ahead of Idaho and the U.S. An influx of seniors will fuel healthcare job growth, while strong demographics support consumer industries and construction. Longer term, job gains will outpace the U.S. average thanks to big population additions, but low educational attainment will limit higher-value-added investment and per capita income.

Housing

The housing market will benefit as more people relocate to the area. Household formation is outpacing the rapid state average, consistent with several years of robust in-migration. Household formation will advance at a rate more than twice the national average through the medium term, driving the demand for residential construction. Home sales are steadily increasing and home prices are near their post-recession highs. Residential building rose faster than in the West and the U.S. in 2018. Housing has a larger effect on the local economy than it does nationally, accounting for more than 13 percent of employment versus just 9 percent in the U.S.

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Affordable housing
- Access to credit

Opportunities for participation by financial institutions include the following:

- Lending and investing in affordable housing, including the construction of affordable housing, and neighborhood revitalization and stabilization projects

State of Illinois

Chicago-Naperville-Elgin, IL MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Chicago-Naperville-Elgin, IL MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,014	12.7	23.1	32.5	31.4	0.3
Population by Geography	8,586,609	8.7	23.0	34.6	33.5	0.1
Housing Units by Geography	3,412,186	9.3	22.1	35.1	33.4	0.0
Owner-Occupied Units by Geography	2,090,172	3.8	17.4	38.4	40.4	0.0
Occupied Rental Units by Geography	1,009,702	17.4	30.2	30.7	21.7	0.0
Vacant Units by Geography	312,312	20.6	27.5	27.3	24.7	0.0
Businesses by Geography	464,610	4.3	15.2	33.3	47.1	0.1
Farms by Geography	8,249	2.4	12.5	43.8	41.3	0.0
Family Distribution by Income Level	2,063,906	22.1	16.8	19.7	41.4	0.0
Household Distribution by Income Level	3,099,874	24.3	15.8	17.9	41.9	0.0
Median Family Income MSA - 16974 Chicago-Naperville-Arlington Heights, IL MD		\$72,196	Median Housing Value			\$290,513
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI MD		\$86,241	Families Below Poverty Level			9.0%
Median Family Income MSA - 20994 Elgin, IL MD		\$76,576	Median Gross Rent			\$949

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Chicago-Naperville-Elgin, IL MSA comprises Cook, DeKalb, DuPage, Grundy, Kane, Kendall, Lake, McHenry, and Will counties in Illinois. The bank's delineation of the Chicago-Naperville-Elgin, IL MSA excludes Jasper, Lake, Newton, and Porter counties in Indiana (Gary, IN Metropolitan Division) and Kenosha County, Wisconsin. The principal city is Chicago. With an estimated population of 9.5 million, the MSA has the third largest population in the United States.

Employment and Economic Factors

The assessment area has one of the largest and most diverse economies in the United States. There are more than four million employees and an annual gross regional product of over \$561 billion. The region is home to more than 400 major corporate headquarters, including 31 of the Fortune 500. Key economic sectors include auto manufacturing, biotech, business services, energy, fintech, food manufacturing, freight, fabricated metals, health services, information technology, manufacturing, medical technology, plastics, and chemicals. The area's largest employers include the U.S. Government, Chicago Public Schools, The City of Chicago, Jewel-Osco, and Cook County. The unemployment rate has improved from 10.3 percent in January 2011 to 6.0 percent in June 2016. The rate of employment growth was below the national average over this same period.

Housing

The National Association of Realtors reports an increase in housing prices in the assessment area. In 2014, the median sales price of existing single-family homes in the MSA was \$205,900 and increased to \$246,400 in June 2016. The 2016 Housing Affordability Index (HAI)⁷² composite score for the MSA was 188.2. The index measures affordability of housing for a single family to qualify for a mortgage loan using average price and income data. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Additional banking branches in LMIs, particularly the south and east sides of Chicago, and Gary and Hammond, Indiana
- Small loans to businesses of less than \$100K
- Flexible and low dollar mortgage options
- Second change and credit building retail products
- Cash, in-kind, and volunteer support for housing and lending counselors, and community planning/organizing operations
- Home rehabilitation lending

Opportunities for participation by financial institutions include the following:

- Partner with community development organizations
- Provide credit counseling
- Invest in loan pools developed by non-profit CDFIs
- Establish an advisory board for regular communication between the financial institutions and community organizations servicing low- and moderate-income communities

⁷² Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

State of Iowa

Des Moines-West Des Moines, IA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Des Moines-West Des Moines, IA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	131	6.1	25.2	45.0	22.9	0.8
Population by Geography	569,633	4.6	22.3	44.1	28.9	0.0
Housing Units by Geography	236,083	5.2	23.6	44.1	27.0	0.0
Owner-Occupied Units by Geography	159,570	2.3	19.9	46.6	31.2	0.0
Occupied Rental Units by Geography	60,185	11.9	32.2	38.1	17.8	0.0
Vacant Units by Geography	16,328	8.7	28.6	42.1	20.7	0.0
Businesses by Geography	43,311	10.2	16.9	41.4	31.3	0.1
Farms by Geography	2,184	1.6	13.8	61.6	23.0	0.0
Family Distribution by Income Level	145,304	19.6	18.0	22.9	39.5	0.0
Household Distribution by Income Level	219,755	22.5	17.0	19.3	41.2	0.0
Median Family Income MSA - 19780 Des Moines-West Des Moines, IA MSA		\$71,705	Median Housing Value			\$155,367
			Median Gross Rent			\$723
			Families Below Poverty Level			6.8%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Des Moines-West Des Moines, IA MSA is located in central Iowa. The MSA comprises Dallas, Guthrie, Madison, Polk, and Warren counties. As of the 2010 census, the estimated population is 569,633. The principal cities are Des Moines and West Des Moines. Des Moines is Iowa's capital, county seat, and the most populous city in Iowa.

Employment and Economic Factors

Des Moines is a major center of the insurance industry and has a sizable financial services and publishing business base. Other major corporations headquartered outside of Iowa have established a presence in the Des Moines metro area including Wells Fargo, Voya Financial, and Electronic Data Systems. As a center of financial and insurance services, other significant corporations have established a presence such as health care, delivery services, tire manufacturers and nutrition food technology.

Some of the major companies in the area are Mercy Medical Center, UnityPoint Health, Principal Financial Group, Nationwide/Allied Insurance, and United Parcel Service. The largest employer in the local area is Wells Fargo with 13,500 employees. Kemin Industries has opened a state-of-the-art headquarters for a global nutritional ingredient company. According to the Bureau of Labor Statistics, year over year trending of unemployment decreased within

the MSA. The highest unemployment rate over the evaluation period occurred in December 2012 at 4.9 percent and dropped to 3.2 percent as of December 2016.

Housing

According to the 2017 American Community Survey, the median housing value increased to \$187,500 from \$155,367 reported during the 2010 Census. The 2016 Housing Affordability Index (HAI)⁷³ composite score for the metropolitan area is 230.1. The index measures affordability of housing for a single family to qualify for a mortgage loan using average price and income data. The higher the score the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1. The median gross rent for the assessment area is \$723.

Community Contacts

According to community contacts, the economic conditions of Des Moines are improving for some, but not for everyone. Certain neighborhoods suffer from years of disinvestment. Community contacts indicated that local credit unions are doing a better job working with low- and moderate-income individuals than banks in Iowa. In addition, rural markets need affordable housing and access to alternative energies. Community contacts have identified the following needs for the MSA:

- Affordable housing
- Small dollar loans to consumers
- Affordable banking services
- More larger banks located in low- and moderate-income neighborhoods and throughout the state

Opportunities for participation by financial institutions include the following:

- Affordable housing – access to affordable housing both for low- and moderate-income homebuyers and renters
- Homebuyer Education and Counseling
- Nonprofit Capacity building – training for nonprofit leaders; webinars
- Financial Literacy Education – for youth and adults (budgeting, goal-setting)
- Board Service volunteers – board and committee members needed
- Education – K-12; mentoring - improvement of high school graduation rates
- Hunger Relief & food insecurity – basic needs, healthy food, comprehensive services/counseling
- Workforce development – providing job skills training, employment placement with a particular focus on immigrants

⁷³ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

State of Kansas

Topeka, KS MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Topeka, KS MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	10.5	19.3	49.1	21.1	0.0
Population by Geography	233,870	8.1	17.3	48.6	25.9	0.0
Housing Units by Geography	103,177	8.5	18.3	49.5	23.6	0.0
Owner-Occupied Units by Geography	66,920	3.9	14.4	51.7	30.0	0.0
Occupied Rental Units by Geography	28,352	16.8	26.2	44.6	12.4	0.0
Vacant Units by Geography	7,905	18.0	23.4	48.3	10.3	0.0
Businesses by Geography	12,398	15.4	13.1	49.5	21.9	0.0
Farms by Geography	873	0.9	3.3	70.9	24.9	0.0
Family Distribution by Income Level	63,403	20.8	17.3	23.2	38.6	0.0
Household Distribution by Income Level	95,272	23.3	16.7	18.9	41.0	0.0
Median Family Income MSA - 45820 Topeka, KS MSA		\$61,110	Median Housing Value			\$111,812
			Families Below Poverty Level			10.0%
			Median Gross Rent			\$647

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The bank has designated its assessment area as the Topeka, KS MSA. The MSA comprises the following counties: Jackson, Jefferson, Osage, Shawnee, and Wabaunsee. The assessment area meets the requirements of the CRA and does not arbitrarily exclude any low- and moderate-income geographies. According to the 2010 Census, the population in the MSA was 233,870.

Topeka is the capital city in the state of Kansas. As detailed in the table above, the population in the assessment area was 233,870 according to the 2010 U.S. Census. The population had declined slightly to 233,149 based on the 2017 American Community Survey. Low-income families represent 20.8 percent of families in the assessment area. Moderate-income families represent 17.3 percent of the assessment area population. The percentage of households in the assessment area living below the federal poverty income level of \$24,250 was 10 percent for 2016, according to the Census Bureau's American Community Survey, the most recent data available. The household poverty rate for the assessment area was lower than the 12.1 percent for the state of Kansas. The 2016 adjusted median family income of \$61,110 for the assessment area was greater than the median family income of \$53,909 for the state of Kansas.

Employment and Economic Factors

Economic conditions, as reflected by the rate of unemployment, were strong during the evaluation period. According to the Bureau of Labor Statistics, the unemployment rate is declining in the MSA. As of December 2016, the unemployment rate for the Topeka, KS MSA was 3.8 percent, reflecting a decrease from the 6.9 percent unemployment rate at the beginning of the 2012 evaluation period.

According to Moody's Analytics, the economy expansion is strengthening, as a revamp of tax policies has finally halted the slide in state government payrolls and a variety of services. Healthcare and professional/businesses services power the private economy.

The top employment sectors in the Topeka, KS MSA are state, federal, county and city government, health care, education, service producing industries, and wholesale and retail trade. The construction and manufacturing industries made modest gains statewide amidst increasing demand for housing and aircraft production. Fortune 500 companies that have established manufacturing or distribution facilities in Topeka include: Burlington Northern Santa Fe Railway, Frito-Lay, Inc., Goodyear Tire & Rubber, Hill's Pet Nutrition, Payless Shoe Source, and Hallmark Cards, Inc. Top employers in the area are the State of Kansas, Stormont-Vail Health Care, Topeka Unified School District 501, federal government, and Goodyear Tire.

Housing

According to the 2010 U.S. Census, 56.4 percent of the total housing units in the assessment area were owner-occupied and 33.1 percent were renter-occupied units. The composition of housing units in low-income census tracts is 3.9 percent owner-occupied, 16.8 percent renter-occupied, and 18 percent vacant units. For units in moderate-income census tracts, 14.4 percent are owner-occupied, 26.2 percent are renter-occupied, and 23.4 percent are vacant units.

According to the 2017 American Community Survey, the median housing value increased to \$132,600 from \$111,812 reported during the 2010 Census. The 2016 Housing Affordability Index (HAI)⁷⁴ composite score for the metropolitan area is 296. The index measures affordability of housing for a single family to qualify for a mortgage loan using average price and income data. The higher the score the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1. The median gross rent for the assessment area is \$724.

Community Contacts

Examiners obtained information on the credit needs of the assessment area from a community contact conducted during the evaluation period. The contact represented an organization focused on providing small business consulting services and training seminars to northeast Kansas entrepreneurs. The contact identified working capital funding for businesses as a need.

⁷⁴ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Wichita, KS MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Wichita, KS MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	152	7.9	30.3	34.2	27.6	0.0
Population by Geography	630,919	5.9	26.5	36.8	30.9	0.0
Housing Units by Geography	263,684	6.6	28.9	36.9	27.6	0.0
Owner-Occupied Units by Geography	166,098	2.9	22.2	39.0	35.8	0.0
Occupied Rental Units by Geography	74,717	12.2	40.7	33.6	13.5	0.0
Vacant Units by Geography	22,869	15.6	38.5	32.0	13.9	0.0
Businesses by Geography	32,470	9.9	21.0	36.6	32.5	0.0
Farms by Geography	1,669	1.5	7.5	61.2	29.8	0.0
Family Distribution by Income Level	160,560	20.2	18.5	21.2	40.1	0.0
Household Distribution by Income Level	240,815	22.9	16.7	18.6	41.8	0.0
Median Family Income MSA - 48620 Wichita, KS MSA		\$61,402	Median Housing Value			\$114,039
			Median Gross Rent			\$645
			Families Below Poverty Level			9.5%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The bank has designated its assessment area as the Wichita, KS MSA. The MSA comprises the following counties: Butler, Harvey, Kingman, Sedgwick, and Sumner. The assessment area meets the requirements of the CRA and does not arbitrarily exclude any low- and moderate-income geographies.

According to the 2017 American Community Survey, the population increased to 646,542 from 630,919 during the 2010 Census. Low-income families represent 20.2 percent of families in the assessment area. Moderate-income families represent 18.5 percent of the assessment area population. The percentage of households in the assessment area living below the federal poverty income level of \$24,250 was 9.5 percent for 2016, according to the Census Bureau's American Community Survey, the most recent data available. The household poverty rate for the assessment area was lower than the 12.1 percent for the state of Kansas. The 2016 adjusted median family income of \$61,110 for the assessment area was greater than the median family income of \$53,906 for the state of Kansas.

Employment and Economic Factors

Economic conditions, as reflected by the rate of unemployment, were strong during the evaluation period. According to the Bureau of Labor Statistics, the unemployment rate is declining in the MSA. As of December 2016, the unemployment rate for the Wichita, KS MSA was 4.4 percent, reflecting a decrease from the 7.5 percent unemployment rate at the beginning of the 2012 evaluation period.

According to Moody's Analytics, the economy is slowly improving despite a stall in the labor market. Payroll employment has changed little since early 2016 and remains below its prerecession peak. Impressive job growth in healthcare and leisure/hospitality is being offset by losses in the public sector. Wichita is largest city and the economic hub of the region. The area offers the low cost of doing business and relatively affordable housing.

The top employment sectors in the Wichita, KS MSA are manufacturing, related to the aircraft industry, healthcare, education, and agriculture. Top employers in the area are the Cessna Aircraft Company, Spirit Aero Systems, Hawker Beechcraft, Unified School District 529, Via Christi Health System, Cargill Meat Solutions, and the State of Kansas.

Housing

According to the 2010 U.S. Census, 59.9 percent of the total housing units in the assessment area were owner-occupied, and 34.7 percent were renter-occupied units. The composition of housing units in low-income census tracts were 2.9 percent owner-occupied, 12.2 percent renter-occupied, and 15.6 percent vacant units. For units in moderate-income census tracts, 22.2 percent were owner-occupied, 40.7 percent renter-occupied, and 38.5 percent vacant units.

According to the 2017 American Community Survey, the median housing value increased to \$138,500 from \$114,039 reported during the 2010 Census. The 2016 Housing Affordability Index (HAI)⁷⁵ composite score for the metropolitan area is 287.4. The index measures affordability of housing for a single family to qualify for a mortgage loan using average price and income data. The higher the score the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1. The median gross rent for the assessment area is \$724.

Community Contacts

We obtained information on the credit needs of the assessment area from a community contact conducted during the evaluation period. The contact represented an organization focused on revitalizing, stabilizing, and reinvesting in assessment area neighborhoods through property development, property management, homebuyer education, and home repair. Banks in the MSA can assist low- and moderate-income families by providing down payment assistance, mortgage and home improvement lending, investments and LIHTCs.

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State of Maine

Portland-South Portland, ME MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Portland-South Portland, ME MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	115	2.6	15.7	60.0	20.9	0.9
Population by Geography	514,098	1.6	12.9	61.9	23.6	0.0
Housing Units by Geography	259,790	1.7	14.3	62.4	21.6	0.0
Owner-Occupied Units by Geography	151,579	0.3	10.4	63.2	26.1	0.0
Occupied Rental Units by Geography	60,057	5.8	24.2	54.3	15.7	0.0
Vacant Units by Geography	48,154	1.1	14.1	70.4	14.4	0.0
Businesses by Geography	33,436	8.3	10.4	56.9	24.4	0.0
Farms by Geography	1,112	2.7	7.5	64.0	25.8	0.0
Family Distribution by Income Level	135,937	19.0	18.3	23.6	39.2	0.0
Household Distribution by Income Level	211,636	23.3	16.1	19.5	41.1	0.0
Median Family Income MSA - 38860 Portland-South Portland, ME MSA		\$67,971	Median Housing Value			\$254,924
			Families Below Poverty Level			6.3%
			Median Gross Rent			\$858
<p>Source: 2010 U.S. Census and 2016 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.</p>						

The Portland-South Portland, ME MSA is located in southern Maine. The MSA comprises Cumberland, Sagadahoc, and York counties. As of the 2017 American Community Survey, the population had increased to 532,083 from 514,098 at the 2010 Census. The principal cities are Portland, South Portland, and Biddeford. Portland is Maine's largest port, set on a peninsula extending into Casco Bay.

Employment and Economic Factors

Over the years, the local economy has shifted from fishing, manufacturing, and agriculture towards a more service-based economy. The top five industries in the state are healthcare, retail, tourism, education services, and construction. Approximately one third of Portland companies are in service industries and about 20 percent of the businesses are in retail. The city also includes a manufacturing sector and it is a leading distribution center for Northern New England. Accessible manufacture jobs produce items such as leather goods, stainless steel, plastic components, food products, metals, paper products, machinery, lumber and wood.

Some of the major companies in the area are UnumProvident Life Insurance, Anthem/ Blue Cross & Blue Shield, Fairchild Semiconductor, WEX, and Southern Maine Community College. According to the city of South Portland, the largest employer in the local area is

UnumProvident Life Insurance, with 3,500 employees. In addition, L.L. Bean Inc. is located nearby and it is a major employer in the region. According to the Bureau of Labor Statistics, the year-over-year trending of unemployment decreased within the MSA. The highest unemployment rate over the evaluation period occurred in December 2012 at 6.1 percent and dropped to 3 percent as of December 2016.

Housing

The median sales price of a home in the metropolitan area is \$254,924. The 2016 Housing Affordability Index (HAI)⁷⁶ composite score for the metropolitan area is 175.8. The index measures affordability of housing for a single family to qualify for a mortgage loan using average price and income data. The higher the score the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1. The median gross rent for the assessment area is \$858.

Community Contacts

Portland's aging population is expanding at a faster pace than nationally. Labor force contraction may translate to higher concentration of low-paying jobs (i.e., leisure and hospitality) and above-average costs of living. Community contacts have identified the following credit and community development needs within the MSA:

- Affordable housing

Opportunities for participation by financial institutions include the following:

- Funding for small business projects
- Funding for financial literacy, homeownership counseling, budget counseling and on-going case management
- Funds to expand workforce development funds for hunger relief

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State of Maryland

Baltimore-Columbia-Towson, MD MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Baltimore-Columbia-Towson, MD MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	681	14.7	21.6	33.3	28.9	1.5
Population by Geography	2,710,489	10.6	20.6	35.5	32.7	0.5
Housing Units by Geography	1,122,992	12.4	21.7	35.3	30.6	0.0
Owner-Occupied Units by Geography	692,428	5.6	16.6	39.0	38.8	0.0
Occupied Rental Units by Geography	325,797	20.6	31.3	30.4	17.7	0.0
Vacant Units by Geography	104,767	32.0	26.0	25.6	16.3	0.0
Businesses by Geography	177,304	6.9	13.9	37.7	41.2	0.2
Farms by Geography	4,014	1.8	7.1	41.4	49.7	0.0
Family Distribution by Income Level	665,999	21.4	17.3	21.0	40.3	0.0
Household Distribution by Income Level	1,018,225	24.0	15.9	18.3	41.8	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$81,788	Median Housing Value			\$296,066
			Median Gross Rent			\$1,034
			Families Below Poverty Level			6.5%

Source: 2010 U.S. Census and 2016 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.

The Baltimore-Columbia-Towson, MD MSA is centrally located in Maryland. The MSA comprises the following seven counties: Anne Arundel, Baltimore, Carroll, Harford, Howard, Queen Anne's, and Baltimore City. As of the 2010 census, the estimated population was 2.7 million and was ranked the 21st most populous metropolitan statistical area of the United States. According to the 2017 American Community Survey, the population has increased to 2.8 million. The principal cities are Baltimore, Columbia, and Towson. The capital of Maryland and the agencies of the Maryland state government are located mainly in Annapolis and Baltimore City.

Employment and Economic Factors

Baltimore and surrounding suburbs are home to four Fortune 1000 companies: Grace Chemicals, Legg Mason, T. Rowe Price, and McCormick & Company. Other companies in the area include AAI Corporation, Adams Express Company, Brown Advisory, Alex Brown, First Home Mortgage Corporation, FTI Consulting, Petroleum & Resources Corporation, Vertis, Prometric, Sylvan Learning, Laureate Education, Under Armour, Polk Audio, DAP, 180s, DeBaufre Bakeries, Wm T. Burnett & Co., Old Mutual Financial Network, Firaxis Games, Sinclair Broadcast Group, Fila, and JoS A. Bank Clothiers. The area is also home to the National Security Agency, Social Security Administration, and the Centers for Medicare & Medicaid Services. According to the Bureau of Labor Statistics, year over year trending of

unemployment decreased within the MSA. The unemployment rate was 4 percent as of December 2016.

Housing

The median housing value is \$296,066. The 2016 Housing Affordability Index (HAI)⁷⁷ composite score for the metropolitan area is 200.7. The index measures affordability of housing for a single family to qualify for a mortgage loan using average price and income data. The higher the score the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1. The median gross rent for the assessment area is \$1,034.

Community Contacts

According to a community contact, almost 40 percent of Baltimore households are identified as unbanked or underbanked. The high number of vacant and abandoned properties in Baltimore continues to be a significant issue. There is an ongoing need for support of programs that will help increase housing diversity in every neighborhood throughout the region. Workforce and job training programs that will allow people to obtain better paying jobs is another ongoing need. The contact also stated programs that will allow capacity building among local non-profit organizations are also needed.

Community contacts have identified the needs for the MSA as:

- Community development
- Other credit related projects or financing programs
- Opportunity for more bank involvement.

-

Opportunities for participation by financial institutions include the following:

- Affordable housing:
 - Affordable housing; quantity is low, more affordable units are needed
 - Affordable housing financing; there is a need for more LIHTCs and collaborative funding; small developers are not able to get bank financing to rehabilitate vacant housing stock into affordable housing
 - Affordable housing CDFI financing; process can be almost as complex and stringent as banks in the application, underwriting and collateral evaluation
- Community service:
 - Cost of living is high for lower income families; includes the cost of ancillary needs; utilities, groceries, laundry, toiletries, transportation, etc.
 - Financial literacy; education for youth and adults. New employees need to learn about what to do with their first paycheck. Lack of budgeting contributes to workforce turnover.
 - Foreclosure prevention education and counseling
 - Hunger relief and food insecurity; there has been a significant increase in need

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- Nonprofit capacity building; webinars continue to be helpful
- Workforce development; jobs for ex-offenders continues to be a challenge. There continues to be a gap between job skills and employer needs.
- Economic development:
 - Small business; access to capital, financial acumen around banking
- Revitalization/stabilization:
 - Crime prevention and safety; there is concern around security
 - Neighborhood revitalization; ongoing investment in the city
 - Neighborhood stabilization; vacant housing continues to impede efforts

State of Massachusetts
Springfield, MA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Springfield, MA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	139	15.8	18.7	34.5	29.5	1.4
Population by Geography	621,570	13.0	20.0	34.7	31.9	0.5
Housing Units by Geography	253,927	11.9	20.3	37.5	30.3	0.0
Owner-Occupied Units by Geography	151,878	3.3	15.4	41.3	40.0	0.0
Occupied Rental Units by Geography	84,459	25.4	27.5	31.6	15.5	0.1
Vacant Units by Geography	17,590	22.5	27.8	32.1	17.7	0.0
Businesses by Geography	35,316	14.0	17.5	34.0	34.3	0.3
Farms by Geography	1,063	2.0	7.5	39.2	51.2	0.1
Family Distribution by Income Level	149,160	23.6	16.1	19.1	41.2	0.0
Household Distribution by Income Level	236,337	27.3	14.1	16.3	42.3	0.0
Median Family Income MSA - 44140 Springfield, MA MSA		\$65,262	Median Housing Value			\$216,460
			Families Below Poverty Level			11.6%
			Median Gross Rent			\$756
<i>Source: 2010 U.S. Census and 2016 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>						

The Springfield, MA MSA is located in western Massachusetts and it comprises Hampden County and Hampshire County. Springfield is the seat of Hampden County. As of the 2017 American Community Survey, the MSA population had increased to 631,652 from 621,570 reported during the 2010 Census.

Springfield is best known as the birthplace for the sport of basketball and it is home to the Basketball Hall of Fame since 2003. The Springfield area has played an important role throughout American history. There are numerous sites of historic and general interest. Springfield is also several years into an economic and cultural resurgence that began during the new millennium forming the Knowledge Corridor metropolitan region. The Knowledge Corridor hosts over 160,000 university students and over 32 universities and liberal arts colleges in the area.

Employment and Economic Factors

Area industries include trade and transportation, education and health services, manufacturing, tourism and hospitality, and government. Springfield is home to a Fortune 100 company, Mass Mutual Financial Group. It is also home to Smith & Wesson handguns, Merriam Webster, American Hockey League, and Baystate Health.

Housing

The median housing value is \$216,460. The 2016 Housing Affordability Index (HAI)⁷⁸ composite score for the metropolitan area is 200.5. The index measures affordability of housing for a single family to qualify for a mortgage loan using average price and income data. The higher the score the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1. The median gross rent for the assessment area is \$756.

Community Contacts

According to community contacts, the Springfield, MO MSA continues to struggle economically with high poverty and unemployment rates. The contacts stated that Springfield is predominately a low-income city with all neighborhoods in the city qualifying for community development block grants. Local financial institutions were perceived positively for their involvement in meeting the needs of the community.

Community contacts have identified the needs for the MSA as:

- Banks assist with providing flexible lending terms and interest rates for local small businesses
- Providing grants to small business to help support local revitalization projects
- Financial education seminars and workshops for small business financing
- Serving on the board of directors for the local non-profits bringing financial expertise
- Purchasing tax credits promoting affordable housing and revitalization of the region

Opportunities for participation by financial institutions include the following:

- Affordable Housing
 - Support for development, preservation and management
- Community Service
 - Board Service volunteers – nonprofit boards and committees
 - Education – K-12, youth development
 - Financial literacy education and stability – for youth, adults and seniors; prevent foreclosures through asset building
 - Financial products and services – for Latinos; Spanish language
 - Healthcare – affordable healthcare options for those whose employers don't provide healthcare, or earn too much to qualify for some sort of support, or those with little cash to pay the high deductible premiums
 - Homeless/supportive and transitional housing
 - Hunger relief and food insecurity and basic needs
 - Nonprofit capacity building – leadership development and BAC webinars
 - Workforce development – including manufacturing, job creation and retention

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- Economic Development
 - Small business – lending, investing and program support including programs focusing on the Latino population
 - Neighborhood stabilization – repairs for low income senior citizens, those with disabilities and veterans

State of Michigan

Detroit-Warren-Dearborn, MI MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Detroit-Warren-Dearborn, MI MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,300	11.0	24.4	35.4	27.9	1.3
Population by Geography	4,296,250	7.8	23.1	37.8	31.3	0.0
Housing Units by Geography	1,889,380	9.4	24.8	37.7	28.1	0.0
Owner-Occupied Units by Geography	1,221,910	4.4	19.8	40.9	34.9	0.0
Occupied Rental Units by Geography	445,203	17.4	33.4	33.3	15.8	0.0
Vacant Units by Geography	222,267	20.9	34.8	29.0	15.1	0.2
Businesses by Geography	242,720	6.6	19.2	36.7	37.0	0.5
Farms by Geography	6,146	3.4	17.9	46.5	31.9	0.2
Family Distribution by Income Level	1,102,281	22.0	17.3	19.9	40.8	0.0
Household Distribution by Income Level	1,667,113	24.5	16.0	17.6	41.9	0.0
Median Family Income MSA - 19804 Detroit-Dearborn-Livonia, MI MD		\$52,946	Median Housing Value			\$161,068
Median Family Income MSA - 47664 Warren-Troy-Farmington Hills, MI MD		\$75,314	Median Gross Rent			\$805
			Families Below Poverty Level			10.7%
<p>Source: 2010 U.S. Census and 2016 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.</p>						

The Detroit-Warren-Dearborn, MI MSA is located in southeast Michigan. It is the largest metropolitan area in the state of Michigan and it is often referred to as the “Metro Detroit”. The MSA comprises the following seven counties: Lapeer, Livingston, Macomb, Oakland, St. Clair, and Wayne. According to the 2017 American Community Survey, the population is 4.3 million. The urban area ranks as the 11th most populous metropolitan area in the United States. The principal cities are Detroit, Warren, and Dearborn.

Employment and Economic Factors

Detroit is a prominent business center, known for its automotive heritage, arts, entertainment, popular music, and sports. The area includes a variety of natural landscapes, parks, and beaches, with a recreational coastline linking the Great Lakes. It is one of the nation's largest metropolitan economies, with 17 Fortune 500 companies. Detroit and the surrounding region constitute a major center of commerce and global trade, most notably as home to America's 'Big Three' automobile companies: General Motors, Ford, and Chrysler. There are a number of firms in the region pursuing emerging technologies including biotechnology, nanotechnology, information technology, and hydrogen fuel cell development.

Among the major companies based in the area, aside from the auto industry, are the University of Michigan, Beaumont Health, U.S. Government, Henry Ford Health System, and Ilitch

Companies. According to the Detroit Chamber of Commerce, the largest employer in the local area is Ford Motor Company, with 44,598 employees. According to the Bureau of Labor Statistics, the year-over-year trending of unemployment decreased within the MSA. The highest unemployment rate over the evaluation period occurred in December 2012 at 10.1 percent and dropped to 5.4 percent as of December 2016.

Housing

The median sales price of a home in the metropolitan area is \$161,068. The 2016 Housing Affordability Index (HAI)⁷⁹ composite score for the metropolitan area is 171.7. The index measures affordability of housing for a single family to qualify for a mortgage loan using average price and income data. The higher the score the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1. The median gross rent for the assessment area is \$805.

Community Contacts

Community contacts have identified the following credit and community development needs within the MSA:

- Food assistance
- Quality employment
- Affordable rental units
- Rental assistance (homelessness prevention)
- Lack of credit/ Credit repair

Opportunities for participation by financial institutions include the following:

- Funding for financial literacy, homeownership counseling, budget counseling and on-going case management
- Funds to expand workforce development
- Funds for IDA matching
- Funds for Head Start
- Construction financing

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State of Minnesota

Minneapolis-St. Paul-Bloomington, MN-WI MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Minneapolis-St Paul-Bloomington, MN-WI MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	767	8.2	19.8	44.5	27.0	0.5
Population by Geography	3,223,495	6.3	17.1	47.3	29.1	0.1
Housing Units by Geography	1,325,604	6.4	18.4	47.9	27.3	0.0
Owner-Occupied Units by Geography	904,114	2.5	14.1	50.8	32.5	0.0
Occupied Rental Units by Geography	340,969	15.5	28.3	41.2	15.1	0.0
Vacant Units by Geography	80,521	11.0	24.2	44.3	20.5	0.0
Businesses by Geography	231,725	4.6	15.6	46.3	33.4	0.0
Farms by Geography	7,170	1.3	14.3	56.9	27.5	0.0
Family Distribution by Income Level	804,029	19.2	17.7	23.3	39.8	0.0
Household Distribution by Income Level	1,245,083	22.7	16.5	19.6	41.2	0.0
Median Family Income MSA - 33460 Minneapolis-St. Paul-Bloomington, MN-WI MSA		\$79,301	Median Housing Value			\$253,682
			Families Below Poverty Level			6.3%
			Median Gross Rent			\$858
<i>Source: 2010 U.S. Census and 2016 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>						

The Minneapolis-St. Paul-Bloomington, MN-WI MSA spans across Minnesota and Wisconsin. The MSA comprises Anoka, Carver, Chisago, Dakota, Hennepin, Isanti, Le Sueur, Millie Lacs, Pierce, Ramsey, Scott, Sherburne, Sibley, St. Croix, Washington, and Wright counties. The bank has defined its assessment area to include the whole MSA, except Pierce and St. Croix counties in Wisconsin. As of the 2017 American Community Survey, the estimated population is 3.6 million. The MSA is ranked 14th in the nation by population. The principal cities are Minneapolis and St. Paul. The area is commonly known as the “Twin Cities”. St. Paul is the state capital. The metropolitan area is built around the Mississippi, Minnesota, and St. Croix rivers. Minneapolis has modern skyscrapers and St. Paul has been likened to an East coast city with quaint neighborhoods and Victorian architecture. There are numerous lakes in the region, and the cities offer extensive park systems for recreation.

Employment and Economic Factors

The composition of industry within the Minneapolis-St. Paul-Bloomington area includes government, education, healthcare, manufacturing, and retail trade. The metropolitan area is home to 16 Fortune 500 headquarters - UnitedHealth Group, Target, Best Buy, CHS, 3M, US Bancorp, Supervalu, General Mills, Land O'Lakes, Ecolab, CH Robinson Worldwide, Ameriprise Financial, Xcel Energy, Thrivent Financial, Mosaic, and Patterson. According to the Department of Employment and Economic Development, the top five employers are the State

of Minnesota (41,200), Alina Health System (27,635), University of Minnesota (26,436), Target (26,271), and Fairview Health Services (24,000). The Minneapolis-St. Paul area also ranks as the second largest medical device manufacture center in North America and the fourth-biggest U.S. banking center, based on total assets, ranking behind New York, San Francisco, and Charlotte. According to the Bureau of Labor Statistics, the year-over-year trending of unemployment decreased. The highest unemployment rate over the evaluation period occurred in December 2012 at 5.5 percent and dropped to 3.6 percent as of December 2016.

Housing

The median sales price of a home in the metropolitan area is \$253,682. The 2016 Housing Affordability Index (HAI)⁸⁰ composite score for the metropolitan area is 211.4. The index measures affordability of housing for a single family to qualify for a mortgage loan using average price and income data. The higher the score the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1. The median gross rent for the assessment area is \$858.

Community Contacts

Community contacts have identified the following credit and community development needs within the MSA:

- Affordable housing and placement

Opportunities for participation by financial institutions include the following:

- Funding for small business projects
- Funding for financial literacy, homeownership counseling, budget counseling and on-going case management
- Funds to expand workforce development
- Funding for commercial loans and other banking products

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State of Missouri
Springfield, MO MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Springfield, MO MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	91	3.3	24.2	54.9	17.6	0.0
Population by Geography	436,712	2.3	18.2	59.6	19.8	0.0
Housing Units by Geography	188,099	2.3	20.2	58.5	19.0	0.0
Owner-Occupied Units by Geography	114,920	0.5	16.0	61.2	22.4	0.0
Occupied Rental Units by Geography	57,548	5.2	27.5	53.9	13.4	0.0
Vacant Units by Geography	15,631	4.7	25.1	55.4	14.7	0.0
Businesses by Geography	25,751	0.8	25.2	54.9	19.1	0.0
Farms by Geography	1,200	0.3	10.8	74.8	14.2	0.0
Family Distribution by Income Level	113,220	19.5	18.4	22.1	40.0	0.0
Household Distribution by Income Level	172,468	23.2	16.8	19.4	40.6	0.0
Median Family Income MSA - 44180 Springfield, MO MSA		\$52,463	Median Housing Value			\$126,386
			Median Gross Rent			\$635
			Families Below Poverty Level			11.0%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Springfield, MO MSA comprises Christian, Dallas, Greene, Polk, Stone, Taney, and Webster counties. The bank has defined its assessment area to include all of the counties except Stone and Taney counties. Unless otherwise indicated, the statistics discussed reflect the MSA as a whole. According to the 2017 American Community Survey, the 2016-estimated population of the MSA is 458,930, a 5.1 percent population growth since the 2010 census population of 436,711. As of June 30, 2016, BANA deposits in the assessment area comprised less than 1 percent of the bank's total deposits.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate in the MSA declined from 6.6 percent in January 2012 to 3.5 percent in December 2016. The unemployment rate in the MSA is below the average national and state of Missouri unemployment rates, which declined to 4.7 and 3.9 percent in December 2016, respectively. The education and health industry, government, and retail trade industry are most prominent in the area. Some of the largest employers include Mercy Health Springfield Community, Cox Health Systems, Wal-Mart Stores, Inc., Bass Pro Shops, and Missouri State University.

Housing

The 2016 Housing Affordability Index (HAI)⁸¹ composite score for the MSA was 244.5. The index measures affordability of housing for a single family earning the median family income to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing and neighborhood revitalization/stabilization efforts due to poor quality of existing affordable housing
- Financial literacy/education
- Access to small dollar loans for low- and moderate-income families with reasonable terms

Opportunities for participation by financial institutions include the following:

- Lending and investment in affordable housing and neighborhood revitalization/stabilization projects
- Supporting community development services, such as financial literacy/education
- Working with area's non-profit organizations, foundations, state and local government, and workforce development organizations and providing grant money

⁸¹ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

State of Nevada

Las Vegas-Henderson-Paradise, NV MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Las Vegas-Henderson-Paradise, NV MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	487	5.7	23.2	41.3	29.8	0.0
Population by Geography	1,951,269	5.3	22.8	42.2	29.7	0.0
Housing Units by Geography	812,840	5.8	23.7	42.3	28.2	0.0
Owner-Occupied Units by Geography	405,047	1.7	15.5	45.7	37.1	0.0
Occupied Rental Units by Geography	290,654	10.8	33.2	39.2	16.8	0.0
Vacant Units by Geography	117,139	7.5	28.4	38.2	25.9	0.0
Businesses by Geography	94,127	5.1	21.0	42.4	31.5	0.0
Farms by Geography	1,497	1.9	18.0	46.3	33.8	0.0
Family Distribution by Income Level	457,592	20.1	18.0	22.0	39.9	0.0
Household Distribution by Income Level	695,701	21.7	17.6	19.8	40.9	0.0
Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA		\$63,888	Median Housing Value			\$253,307
			Families Below Poverty Level			8.7%
			Median Gross Rent			\$1,061
<i>Source: 2010 U.S. Census and 2016 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>						

The Las Vegas-Henderson-Paradise, NV MSA comprises Clark County. As of the 2010 census, the population of the MSA was just under 2 million with a 2016-estimated population of 2.2 million. With an estimated population growth of 10.5 percent since the most recent census, population growth in this MSA is among the most rapid in the United States and more than double the national average. As of June 30, 2016, BANA deposits in the MSA represented approximately 1.1 percent of the bank's total deposits.

Employment and Economic Factors

Employment is relatively volatile in the area. This MSA is one of the world's largest tourist destinations and the leisure and hospitality services industry, food service, and retail trade industry are prominent in the area. Some of the largest employers include Station Casinos Inc., Boyd Gaming Corp., Las Vegas Sands Corp., and various other large casinos on the Las Vegas Strip, such as the MGM Grand, Bellagio, and the Wynn. According to the Bureau of Labor Statistics, the unemployment rate in the MSA declined from 13.1 percent in January 2012 to 5.1 percent in December 2016. From 2012 through 2016, the MSA was among the MSAs with highest unemployment rates in the county, but also experienced some of largest unemployment rate declines in the nation and the state of Nevada during the period. As of December 2016, the unemployment rate in the MSA remains slightly above the national average unemployment rate of 4.7 percent and the state of Nevada average unemployment rate of 4.9 percent.

Housing

The MSA was one of the hardest hit areas during the housing collapse. Housing supply is tight as population growth increases housing demands. According to the National Association of Realtors, the average Housing Affordability Index (HAI)⁸² for the MSA in 2016 was 145.8, which is lower than the national average HAI of 167.1. The HAI has declined by 10 points since 2014, which indicates that homes became less affordable for the typical family during that time. The HAI measures whether or not a family earning the median family income could qualify for a mortgage loan on an existing single-family median priced home. The higher the index, the more affordable the homes are in the area for a typical family. According to Housing and Urban Development (HUD), the fair market rent as of December 2016 for a two-bedroom unit was \$968 in the MSA, which remained relatively stable since 2015.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Financial literacy/education
- Affordable housing, including homeownership and rental housing
- Neighborhood revitalization/stabilization efforts due to poor quality of existing properties
- Access to capital for small businesses and short-term emergency loans to military personnel until they receive reimbursement for relocation costs

Opportunities for participation by financial institutions include the following:

- Supporting community development services, such as financial literacy/education
- Lending and investment in affordable housing and neighborhood revitalization/stabilization projects
- Working with area's non-profit organizations, foundations, state and local government, and workforce development organizations

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Reno, NV MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Reno, NV MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	112	8.9	21.4	32.1	33.0	4.5
Population by Geography	425,417	10.1	22.3	34.9	32.7	0.1
Housing Units by Geography	183,735	10.4	24.0	33.1	32.5	0.0
Owner-Occupied Units by Geography	98,500	3.5	15.4	37.8	43.3	0.0
Occupied Rental Units by Geography	64,123	20.9	37.1	26.6	15.3	0.0
Vacant Units by Geography	21,112	11.2	24.2	30.8	33.8	0.0
Businesses by Geography	23,962	10.5	29.3	22.2	32.9	5.1
Farms by Geography	498	5.4	19.3	31.1	42.0	2.2
Family Distribution by Income Level	103,011	20.9	17.8	20.6	40.7	0.0
Household Distribution by Income Level	162,623	22.8	17.0	18.6	41.6	0.0
Median Family Income MSA - 39900 Reno, NV MSA		\$67,350	Median Housing Value			\$298,314
			Median Gross Rent			\$957
			Families Below Poverty Level			8.4%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Reno, NV MSA comprises Storey and Washoe counties. Reno and Sparks are the principal cities in the MSA. According to the 2017 American Community Survey, the 2016-estimated population of the MSA is 457,667, which indicates 7.6 percent population growth since the 2010 census reported a population of 425,437. As of June 30, 2016, BANA deposits in the MSA represented approximately 0.1 percent of the bank's total deposits.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate in the MSA declined from 13 percent in January 2012 to 4.2 percent in December 2016. As of December 2016, the unemployment rate has fallen below the national average unemployment rate of 4.7 percent and the state of Nevada average unemployment rate of 4.9 percent. The leisure and hospitality services industry, retail trade industry, and health and education services industry are prominent in the area. Some of the largest employers include the University of Nevada-Reno, Renown Health, and various casino/gaming companies, such as Peppermill Hotel casino, Grand Sierra Hotel and Casino, International Game Technology, Silver Legacy Resort Casino, and Atlantis Casino Resort. Recently, the construction industry, professional and business services industry, and transportation and utilities industry have been growing at a rapid rate as major high-tech firms continue to arrive in the area.

Housing

The 2016 Housing Affordability Index (HAI)⁸³ composite score for the MSA was 128.6. The index measures affordability of housing for a single family earning the median family income to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Access to capital for small businesses
- Affordable housing
- Homelessness

Opportunities for participation by financial institutions include the following:

- Support small businesses through loans and investments
- Lending and investment in affordable housing
- Working with area's non-profit organizations, foundations, and state and local government

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State of New Hampshire
Manchester-Nashua, NH MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Manchester-Nashua, NH MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	9.3	22.1	48.8	18.6	1.2
Population by Geography	400,721	6.6	18.8	51.1	23.5	0.0
Housing Units by Geography	164,603	7.7	20.7	50.8	20.8	0.0
Owner-Occupied Units by Geography	105,611	1.8	14.2	55.7	28.3	0.0
Occupied Rental Units by Geography	47,509	19.6	33.4	40.0	7.0	0.0
Vacant Units by Geography	11,483	12.0	27.7	51.4	9.0	0.0
Businesses by Geography	27,495	12.1	14.5	48.5	24.4	0.4
Farms by Geography	754	2.8	9.9	57.4	29.8	0.0
Family Distribution by Income Level	104,907	18.9	18.8	23.6	38.7	0.0
Household Distribution by Income Level	153,120	22.7	16.8	19.8	40.7	0.0
Median Family Income MSA - 31700 Manchester-Nashua, NH MSA		\$81,794	Median Housing Value			\$265,701
			Families Below Poverty Level			5.2%
			Median Gross Rent			\$1,001

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Manchester-Nashua, NH MSA comprises Hillsborough County, which is the most populous county in the state. Population growth is slow relative to the national average. According to the 2017 American Community Survey, the 2016-estimated population of the MSA is 407,761, which indicates 1.8 percent population growth since the 2010 census reported a population of 400,720. As of June 30, 2016, BANA deposits in the MSA represented less than 1 percent of the bank's total deposits.

Employment and Economic Factors

According to the Bureau of Labor Statistics, the unemployment rate declined from 6.2 percent in January 2012 to 2.6 percent in December 2016. The unemployment rate is below the average national unemployment rate and kept pace with the decline in the state of New Hampshire average unemployment rate, which declined from 6.0 percent in January 2012 to 2.5 percent in December 2016. The healthcare services industry and the financial and banking industries are most prominent in the area. Some of the largest employers include Elliott Hospital, Southern NH Medical Center, Catholic Medical Center, St. Joseph Hospital and Trauma Center, Fidelity Investments, TD Bank, and Citizens Bank. The utility and education sectors are also leading employers for the county.

Housing

According to the New Hampshire Realtors organization, the increase in the median housing price for the county kept pace with the state median housing price. The county median housing price remained below the national average at \$213,000 and \$260,000 in 2012 and 2016, respectively. According to the National Association of Realtors, the average Housing Affordability Index (HAI)⁸⁴ for the MSA decreased by 9.1 points to 192.3 between 2013 and 2016, but remains higher than the national average HAI of 167.1. This indicates that homes became less affordable for the typical family during that time. The HAI measures whether or not a family earning the median family income could qualify for a mortgage loan on an existing single-family median priced home. The higher the index, the more affordable the homes are in the area for a typical family.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Access to capital for small businesses
- Affordable housing and neighborhood revitalization/stabilization

Opportunities for participation by financial institutions include the following:

- Support small businesses and CDFIs through loans and investments
- Lending and investment in affordable housing and neighborhood revitalization/stabilization projects
- Working with area's non-profit organizations, foundations, and state and local government

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State of New Jersey

Atlantic City-Hammonton, NJ MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Atlantic City-Hammonton, NJ MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	69	10.1	18.8	46.4	23.2	1.4
Population by Geography	274,549	6.9	19.8	49.5	22.9	0.9
Housing Units by Geography	125,826	8.6	18.5	49.8	23.1	0.0
Owner-Occupied Units by Geography	71,885	2.9	14.1	55.4	27.6	0.0
Occupied Rental Units by Geography	29,760	19.8	33.7	38.1	8.4	0.0
Vacant Units by Geography	24,181	11.7	12.8	47.5	28.0	0.0
Businesses by Geography	15,489	9.1	14.0	50.2	26.7	0.1
Farms by Geography	504	0.8	7.7	59.7	31.7	0.0
Family Distribution by Income Level	67,256	21.3	17.8	20.5	40.4	0.0
Household Distribution by Income Level	101,645	23.9	16.5	17.6	42.0	0.0
Median Family Income MSA - 12100 Atlantic City-Hammonton, NJ MSA		\$66,920	Median Housing Value			\$287,026
			Median Gross Rent			\$959
			Families Below Poverty Level			8.8%
<p>Source: 2010 U.S. Census and 2016 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.</p>						

The Atlantic City-Hammonton, NJ MSA comprises Atlantic County. According to the 2010 census, the population totaled 274,549 in the MSA. The largest geographic subdivision within the MSA at the time of the 2010 census was Egg Harbor Township with a population of 43,323 followed by Atlantic City and Galloway Township with 39,558 and 37,349, respectively. The population is estimated to have declined to 270,991 as July 1, 2016.

Employment and Economic Factors

According to Moody's Analytics, the Atlantic City-Hammonton, NJ MSA economy is stabilizing as gaming improves and Atlantic City shores up its finances. After dipping to a more than 25-year low in 2016, payroll employment in the assessment area has increased by 3 percent and in 2017, growth has outpaced the New Jersey and U.S. averages. Despite these improvements, the metro area continues to struggle as outsized gains in low-wage leisure/hospitality have contributed to a weaker employment mix and lower average hourly earnings. The assessment area's 4 percent year-over-year decline in average pay is the worst in the state. Additionally, at 7.3 percent, the jobless rate is the second highest in New Jersey and among the lowest in the Northeast, despite the improving trend in payroll employment.

The casino industry is the primary employer in the assessment area and the closure of five casinos in the area since 2014 led to the loss of almost 8,000 jobs in leisure/hospitality, or about 20 percent of the industry total. While gaming revenue increased by 9 percent during the

first nine months of 2017, increased regional competition from new casinos and the potential for legalized gambling in northern New Jersey threaten industry jobs in the medium and long term.

The state takeover of financially struggling Atlantic City in November 2016 has staved off a bankruptcy filing and begun to shore up the municipality's finances, but at a cost of fewer jobs in government. A declining population, weakness in housing, and the state's plans to remedy a dire fiscal position will weigh heavily on Atlantic City-Hammonton in the short run, but improvement in gaming and support from leisure/hospitality will keep the metro area among recession. In the long run, weak demographics and low industrial diversity will ensure that the assessment area significantly underperforms the state and nation.

Housing

The housing market in the assessment area remains weak. The inventory of foreclosures in the assessment area are down from their late-2016 peak, but at 43 per 1,000 households they are the highest in the U.S. and eight times more prevalent than they are nationally. The glut of distressed properties is due in part to the soft labor market and the state's lengthy judicial foreclosure process. The excess stock of foreclosures is dragging down house prices. House price appreciation has lagged the state and national averages since late 2014, but the gap is narrowing as demand among land speculators and developers strengthens and the supply of distressed properties declines. Despite the positive indicators, the large backlog of foreclosure will take time to clear, suppressing prices and residential building for the time being.

According to the National Association of Realtors, the average Housing Affordability Index (HAI)⁸⁵ for the MSA increased by 45.9 points to 204.6 between 2013 and 2016, and it remains higher than the national average HAI of 167.1. This indicates that homes became more affordable for the typical family during that time. The HAI measures whether or not a family earning the median family income could qualify for a mortgage loan on an existing single-family median priced home. The higher the index, the more affordable the homes are in the area for a typical family.

Community Contacts

A review of community contacts and local community development plans indicated that the following are identified needs within the market:

- Disaster recovery assistance remains a need as the area continues to be affected by storms
- Rental assistance is needed for the low- and moderate-income and homeless
- Assistance in the form of grants, small loans, and training is needed for small businesses
- First-time buyer programs
- Economic development

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Opportunities for participation by financial institutions include the following:

- Banks can get involved by supporting the growth of business ownership and development, creating programs to increase employment and job creation, and funding home ownership initiatives
- Training instructors to teach financial literacy classes is an available opportunity for the banks to support non-profits and the low- and moderate-income who need to be educated
- Fund a mix of housing types to support the demands of the changing population
- Transportation oriented development lending

Trenton, NJ MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Trenton, NJ MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	77	19.5	18.2	29.9	31.2	1.3
Population by Geography	366,513	13.6	16.0	31.9	38.0	0.5
Housing Units by Geography	142,377	15.6	15.7	32.5	36.2	0.0
Owner-Occupied Units by Geography	87,700	6.9	14.1	36.7	42.4	0.0
Occupied Rental Units by Geography	41,513	27.0	17.5	27.6	27.9	0.0
Vacant Units by Geography	13,164	37.9	20.1	20.0	21.9	0.0
Businesses by Geography	22,797	11.1	10.5	29.6	48.8	0.0
Farms by Geography	526	5.5	12.0	30.0	52.5	0.0
Family Distribution by Income Level	87,385	22.8	16.8	19.2	41.2	0.0
Household Distribution by Income Level	129,213	25.6	15.1	16.8	42.5	0.0
Median Family Income MSA - 45940 Trenton, NJ MSA		\$88,694	Median Housing Value			\$325,552
			Families Below Poverty Level			7.4%
			Median Gross Rent			\$1,052

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Trenton, NJ MSA is centrally located in New Jersey and comprises Mercer County. According to the 2017 American Community Survey, the population is estimated to have increased to 371,023 as of July 1, 2016, from 366,513 at the time of the 2010 census. The largest geographic subdivision within the MSA is Hamilton Township with a population of 88,464, followed by Trenton City, and Ewing Township with populations of 84,913 and 35,790, respectively.

Employment and Economic Factors

According to Moody's Analytics, the Trenton, New Jersey assessment area is in the late expansion phase of the business cycle. Employment rates in this MSA have improved significantly during the rating period. According to the Bureau of Labor Statistics, the unemployment rate in the MSA declined from 8.4 percent in January 2012 to 3.6 percent in December 2016. The unemployment rate in the MSA was below the state average of 4.2 percent. Banking, education, pharmaceutical, and healthcare are the most prominent industries in the MSA. Some of the largest employers include Bank of America, Princeton University, Bristol-Myers Squibb, and Capital Health System.

Housing

According to the National Association of Realtors, the average Housing Affordability Index (HAI)⁸⁶ for the MSA increased by 15.5 points to 209.3 between 2013 and 2016, which is higher than the national average HAI of 167.1. This indicates that homes became more affordable for the typical family during that time. The HAI measures whether or not a family earning the median family income could qualify for a mortgage loan on an existing single-family median priced home. The higher the index, the more affordable the homes are in the area for a typical family.

Community Contacts

A review of community contacts and local community development plans indicated that the following are identified needs within the market:

- Starter and rental homes

Opportunities for participation by financial institutions include the following:

- Funding multifamily housing development
- Providing assistance to homeowners in foreclosure
- Home improvement loans for the aging housing stock
- Development of partnerships with community development organizations to address needs in the assessment area

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State of New Mexico
Albuquerque, NM MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Albuquerque, NM MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	203	4.9	28.6	35.5	30.5	0.5
Population by Geography	887,077	4.5	31.7	33.6	30.2	0.0
Housing Units by Geography	367,757	5.1	30.7	35.1	29.1	0.0
Owner-Occupied Units by Geography	229,939	2.2	27.7	35.3	34.7	0.0
Occupied Rental Units by Geography	106,770	10.3	36.5	34.5	18.8	0.0
Vacant Units by Geography	31,048	8.6	33.6	35.2	22.6	0.0
Businesses by Geography	53,811	6.4	26.6	34.3	32.7	0.0
Farms by Geography	1,129	3.2	25.9	37.5	33.5	0.0
Family Distribution by Income Level	215,464	22.2	17.9	19.2	40.8	0.0
Household Distribution by Income Level	336,709	23.8	16.4	17.8	42.0	0.0
Median Family Income MSA - 10740 Albuquerque, NM MSA		\$59,381	Median Housing Value			\$193,241
			Median Gross Rent			\$748
			Families Below Poverty Level			11.6%
<i>Source: 2010 U.S. Census and 2016 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>						

The Albuquerque, NM MSA comprises Bernalillo, Sandoval, Torrance, and Valencia counties. According to the 2010 census, the population totaled 887,077 in the MSA. The largest counties within the MSA at the time of the 2010 census were Bernalillo and Sandoval with populations of 662,564 and 131,561, respectively. The 2017 American Community Survey estimates the population increased to 910,726 as July 1, 2017.

Employment and Economic Factors

According to Moody's Analytics, the assessment area is in the recovery phase of the business cycle. Employment levels are expected to reach its prerecession peak as job gains have outpaced labor force growth. The unemployment rate was 5.5 percent as of December 2016, a decline from 7.7 percent as of January 2012 and the 9 percent peak as of June 2010. The main weak point for the MSA continues to be construction. The retail industry shows signs of recovery, while residential, office, and industrial construction remains at cyclical lows. The housing market has not fully recovered since the recession. Slow demand is reflected in the house price indexes, which have been stuck at 3 to 4 percent growth since 2015. The ratio of inventory to pending home sales is lower than at any point since 2006. The commercial real estate vacancy rate is slightly higher than 10 percent. The market for industrial space has lower vacancy, but very slow absorption and has had no new construction in years. Despite recent growth in office-using employment, the office vacancy rate is still at more than 20

percent, a hangover from the 2007-2008 construction boom that left the MSA with high levels of excess office space.

Housing

According to the National Association of Realtors, the average Housing Affordability Index (HAI)⁸⁷ for the MSA increased by 8 points to 183.2 between 2013 and 2016 and remained higher than the national average HAI of 167.1. This indicates that homes became more affordable for the typical family during that time. The HAI measures whether or not a family earning the median family income could qualify for a mortgage loan on an existing single-family median priced home. The higher the index, the more affordable the homes are in the area for a typical family.

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Loans for small businesses who are unable to access traditional lending channels

Opportunities for participation by financial institutions include the following:

- Offering and/or investing in financial literacy training for teens and adults
- Providing first time homebuyer counseling
- Offering Individual Development Accounts (IDA)
- Offering/promoting micro-lending programs

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New Mexico Non-MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: New Mexico Non-MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	5.9	64.7	17.6	11.8	0.0
Population by Geography	71,492	4.5	69.5	16.3	9.7	0.0
Housing Units by Geography	25,940	4.5	68.8	15.4	11.2	0.0
Owner-Occupied Units by Geography	12,945	3.5	65.3	18.5	12.7	0.0
Occupied Rental Units by Geography	4,686	8.3	60.5	14.4	16.8	0.0
Vacant Units by Geography	8,309	3.8	79.1	11.3	5.8	0.0
Businesses by Geography	2,046	7.7	55.5	10.5	26.3	0.0
Farms by Geography	23	0.0	26.1	0.0	73.9	0.0
Family Distribution by Income Level	12,389	30.3	19.0	18.2	32.5	0.0
Household Distribution by Income Level	17,631	31.3	17.7	15.3	35.7	0.0
Median Family Income Non-MSAs - NM		\$46,354	Median Housing Value			\$73,090
			Families Below Poverty Level			26.6%
			Median Gross Rent			\$486

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The New Mexico Non-MSA comprises McKinley County. The county is located in the northwestern section of New Mexico. According to the 2010 census, the population totaled 71,492 in the assessment area. The largest geographic subdivision within the MSA at the time of the 2010 census was Gallup city with a population of 21,678. The 2017 American Community Survey estimates the population to have increased to 72,564 as July 1, 2017. McKinley County is one of only three counties in the U.S. where the most spoken language is neither English nor Spanish. Approximately 46 percent of the population speaks Navajo.

Employment and Economic Factors

Major employers in McKinley County include Gallup McKinley County Schools, Gallup Indian Medical Center, Walmart, and Rehoboth McKinley Christian Hospital. The local labor force is in excess of 25,000 workers. In 2013, the per capita personal income in McKinley County was \$24,383, which was the lowest per capita in the state of New Mexico. During that period, approximately 64 percent of the workers were employed in the private sector, with government employment accounting for 27 percent and farm employment accounting for the remaining 9 percent.

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Offering specialized loan products for low and moderate income people

Opportunities for participation by financial institutions include the following:

- Assisting a local organization with its down-payment escrow program that was established for low and moderate income resident

State of New York

Buffalo-Cheektowaga-Niagara Falls, NY MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Buffalo-Cheektowaga-Niagara Falls NY MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	297	12.5	20.2	41.4	23.9	2.0
Population by Geography	1,135,509	9.6	17.0	39.0	33.2	1.2
Housing Units by Geography	519,118	12.0	19.4	38.9	29.7	0.0
Owner-Occupied Units by Geography	312,759	5.0	14.2	43.1	37.7	0.0
Occupied Rental Units by Geography	153,473	20.1	26.7	35.0	18.3	0.0
Vacant Units by Geography	52,886	29.8	28.7	25.7	15.8	0.0
Businesses by Geography	62,374	8.0	14.5	41.0	36.0	0.4
Farms by Geography	1,704	2.6	5.5	50.2	41.6	0.0
Family Distribution by Income Level	287,669	21.6	17.4	20.9	40.1	0.0
Household Distribution by Income Level	466,232	25.2	15.6	17.0	42.2	0.0
Median Family Income MSA - 15380 Buffalo-Cheektowaga-Niagara Falls, NY MSA		\$62,530	Median Housing Value			\$113,014
			Families Below Poverty Level			10.0%
			Median Gross Rent			\$670
<p>Source: 2010 U.S. Census and 2016 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.</p>						

The Buffalo-Cheektowaga-Niagara Falls, NY MSA comprises Erie and Niagara counties. According to the 2017 American Community Survey, the estimated population is 1.1 million. The MSA is the second largest metropolitan area in the state of New York, centered on its largest city – Buffalo.

Employment and Economic Factors

The Buffalo-Cheektowaga-Niagara Falls, NY MSA has a well-diversified economy. Key economic sectors include health care, financial services, retail, and entertainment. The area's largest employer is Kaleida Health with approximately 10,000 thousand employees. Other large employers include Catholic health System, Manufacturers and Trade Trust Company, and Seneca Gaming Corporation. The assessment area has shown a decreasing unemployment level during the evaluation period. In January 2012, the unemployment rate in the MSA was 9.3 percent. By December 2016, the rate decreased to 5.1 percent compared to the statewide rate of 4.8 percent.

Housing

The National Association of Realtors reports a moderate increase in housing prices in the Buffalo-Cheektowaga-Niagara Falls, NY MSA, increasing from a median sales price of existing

single-family homes of \$129,000 in 2014 to \$133,000 in 2016. The 2016 Housing Affordability Index (HAI)⁸⁸ composite score for the MSA was 301.8. The index measures affordability of housing for a single family to qualify for a mortgage loan on a median priced home. The higher the score above 100, the more affordable the homes. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated the following identified needs within the community:

- Commercial office space
- Affordable decent housing for low- and moderate-income
- Development in city neighborhoods outside of downtown due to zombie foreclosures properties

Opportunities for participation by financial institutions include the following:

- 1-4 family home construction on vacant lots
- Rehabilitation/home improvement loans for individuals
- Loans to smaller and new developers to develop mixed used properties

⁸⁸ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Kingston, NY MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Kingston, NY MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	0.0	14.9	70.2	14.9	0.0
Population by Geography	182,493	0.0	12.3	72.3	15.4	0.0
Housing Units by Geography	83,007	0.0	15.1	70.8	14.1	0.0
Owner-Occupied Units by Geography	49,203	0.0	10.4	74.4	15.2	0.0
Occupied Rental Units by Geography	21,488	0.0	19.9	68.0	12.1	0.0
Vacant Units by Geography	12,316	0.0	25.3	61.5	13.2	0.0
Businesses by Geography	11,393	0.0	13.4	69.6	17.0	0.0
Farms by Geography	523	0.0	6.5	67.3	26.2	0.0
Family Distribution by Income Level	45,201	19.6	17.8	23.0	39.6	0.0
Household Distribution by Income Level	70,691	23.6	16.1	19.0	41.3	0.0
Median Family Income MSA - 28740 Kingston, NY MSA		\$70,513	Median Housing Value			\$247,069
			Median Gross Rent			\$944
			Families Below Poverty Level			6.9%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Kingston, NY MSA comprises the Ulster County. According to the 2012-2016 American Community Survey, the total population is estimated at 180,505, a decline from 182,493 reported at the 2010 Census.

Employment and Economic Factors

The Kingston, NY MSA has a well-diversified economy. Key economic sectors include health care, government, and retail trade. The area's major employers include Home Depot, IBM, Marist College, Orange Regional Medical Center, ShopRite, Stop & Shop Supermarkets, Target, Vassar Brothers Medical Center, Walmart, and White Plains Hospital Association. Thirteen companies with corporate headquarters in the region include Archie Comics (Pelham), IBM (Armonk), ITT Corporation (White Plains), MasterCard (Purchase), and PepsiCo (Purchase).

The MSA unemployment rate decreased during the evaluation period. In January 2012, the unemployment rate in the Kingston, NY MSA was 9 percent. By December 2016, the rate decreased to 4.3 percent. The statewide unemployment rate was 4.8 percent.

Housing

The National Association of Realtors reports a moderate increase in housing prices in the Kingston, NY MSA, increasing from a median sales price of existing single-family homes of

\$200,000 in 2014 to \$203,000 in 2016. The 2016 Housing Affordability Index (HAI)⁸⁹ composite score for the MSA was 209.3. The index measures affordability of housing for a single family earning the median income to qualify for a mortgage loan on a median priced home. The higher the score correlates to a higher affordability level to purchase a home. The HAI score for the MSA also reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated the following identified needs within the community:

- Higher income jobs
- Affordable housing

Opportunities for participation by financial institutions include the following:

- Non-profit donations
- Micro-lending/credit building
- Restoration project for the Ulster County Performance Arts Center

⁸⁹ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Syracuse, NY MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Syracuse, NY MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	185	14.1	18.9	39.5	27.0	0.5
Population by Geography	662,577	10.3	16.2	44.1	29.4	0.1
Housing Units by Geography	286,766	10.5	17.9	44.3	27.2	0.0
Owner-Occupied Units by Geography	175,175	3.2	13.6	49.2	34.0	0.0
Occupied Rental Units by Geography	80,967	22.8	26.4	34.2	16.6	0.0
Vacant Units by Geography	30,624	19.9	19.9	43.6	16.3	0.3
Businesses by Geography	35,510	13.5	14.0	43.5	29.0	0.0
Farms by Geography	1,312	1.8	10.2	58.3	29.7	0.0
Family Distribution by Income Level	162,453	21.3	17.1	21.5	40.0	0.0
Household Distribution by Income Level	256,142	24.5	16.4	17.5	41.6	0.0
Median Family Income MSA - 45060 Syracuse, NY MSA		\$63,453	Median Housing Value			\$115,676
			Families Below Poverty Level			9.5%
			Median Gross Rent			\$697

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Syracuse, NY MSA comprises Madison, Onondaga, and Oswego counties. The American Community Survey for 2017 estimates the MSA population at 654,841, a decline from 662,577 during the 2010 Census.

Employment and Economic Factors

The Syracuse, NY MSA has a well-diversified economy. Key economic sectors include healthcare, education, and retail trade. The area's largest employer is Upstate University Health System with approximately 10,000 employees. Other large employers include Syracuse University, St. Joseph's Hospital Health Center, Wegmans Food Markets, and Crouse Hospital. The assessment area unemployment rate decreased during the evaluation period. In January 2012, the unemployment rate in the Syracuse, NY MSA was 9.5 percent. By December 2016, the rate decreased to 5 percent. The statewide unemployment rate was 4.8 percent.

Housing

The National Association of Realtors reports a moderate increase in housing prices in the Syracuse, NY MSA, increasing from a median sales price of existing single-family homes of \$126,000 in 2014 to \$129,000 in 2016. The 2016 Housing Affordability Index (HAI)⁹⁰ composite score for the MSA was 307.4. The index measures affordability of housing for a

⁹⁰ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

single family earning the median family income to qualify for a mortgage loan to purchase a median priced home. The higher the score correlates to a higher affordability level to purchase the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated the following identified needs within the community:

- Affordable home mortgage loan products that comply with qualified mortgage requirements
- Rehabilitation of vacant properties, especially those with structural issues
- Neighborhood revitalization and stabilization in low- and moderate-income communities

Opportunities for participation by financial institutions include the following:

- Community developments liquidity investments for non-profit to offer low- and moderate-income mortgages
- Purchase low- and moderate-income mortgages from the CDFI that originated the mortgages

State of North Carolina
Greensboro-High Point, NC MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Greensboro-High Point, NC MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	168	7.7	23.8	39.3	28.6	0.6
Population by Geography	723,801	6.2	23.1	42.8	28.0	0.0
Housing Units by Geography	317,312	5.9	23.9	43.7	26.4	0.0
Owner-Occupied Units by Geography	186,847	2.4	18.7	46.4	32.6	0.0
Occupied Rental Units by Geography	95,470	11.3	32.4	39.5	16.8	0.0
Vacant Units by Geography	34,995	10.1	28.9	41.4	19.5	0.0
Businesses by Geography	50,356	6.4	19.9	42.9	30.6	0.2
Farms by Geography	1,642	1.6	14.4	54.5	29.4	0.1
Family Distribution by Income Level	184,695	21.8	18.1	19.2	40.8	0.0
Household Distribution by Income Level	282,317	23.3	16.9	17.7	42.1	0.0
Median Family Income MSA - 24660 Greensboro-High Point, NC MSA		\$55,362	Median Housing Value			\$142,459
			Median Gross Rent			\$678
			Families Below Poverty Level			11.9%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Greensboro-High Point, NC MSA comprises Guilford, Randolph, and Rockingham counties. The 2017 American Community Survey estimates the population at 761,184, an increase from 723,801 during the 2010 Census.

Employment and Economic Factors

The Greensboro-High Point, NC MSA has a well-diversified economy. Key economic sectors include healthcare, education, and manufacturing. The area's largest employer is Guilford County Schools with approximately 9,000 employees. Other major employers include Cone Health, Davidson County Board of Education, and Atrium Windows and Doors, Inc. The assessment area unemployment rate decreased during the evaluation period. In January 2012, the unemployment rate in the Greensboro-High Point, NC MSA was 10.4 percent. By December 2016, the rate decreased to 5.0 percent. The statewide unemployment rate was 5.2 percent.

Housing

The National Association of Realtors reports a significant increase in housing prices in the Greensboro- High Point, NC MSA, increasing from a median sales price of existing single-family homes of \$137,000 in 2014 to \$152,000 in 2016. The 2016 Housing Affordability Index

(HAI)⁹¹ composite score for the MSA was 211.2. The index measures affordability of housing for a single family earning the median family income to qualify for a mortgage to purchase a median priced home. The higher the score, the higher affordability level to purchase the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated the following identified needs within the community:

- Low cost checking and other banking products with appropriate marketing or outreach to low- and moderate-income individuals
- Small business lending

Opportunities for participation by financial institutions include the following:

- Community development participation
- Financing
- Credit related products such as micro-lending

⁹¹ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Jacksonville, NC MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Jacksonville, NC MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	0.0	12.5	56.3	21.9	9.4
Population by Geography	177,772	0.0	8.4	63.1	21.7	6.9
Housing Units by Geography	65,939	0.0	8.4	64.6	26.9	0.1
Owner-Occupied Units by Geography	32,073	0.0	3.8	65.1	31.2	0.0
Occupied Rental Units by Geography	24,560	0.0	15.7	67.8	16.4	0.2
Vacant Units by Geography	9,306	0.0	5.0	54.9	40.1	0.0
Businesses by Geography	7,099	0.0	9.8	65.3	23.8	1.1
Farms by Geography	288	0.0	3.5	71.9	24.3	0.3
Family Distribution by Income Level	41,731	17.2	19.8	22.8	40.2	0.0
Household Distribution by Income Level	56,633	20.0	18.2	21.1	40.6	0.0
Median Family Income MSA - 27340 Jacksonville, NC MSA		\$48,380	Median Housing Value			\$137,474
			Families Below Poverty Level			11.0%
			Median Gross Rent			\$797

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Jacksonville, NC MSA comprises Onslow County. The city of Jacksonville is the county seat. The southern border of Onslow County is the Atlantic Ocean. The 2017 American Community Survey estimates the population at 193,893, an increase from 177,772 at the 2010 Census.

Employment and Economic Factors

The Jacksonville, NC MSA has a well-diversified economy. Key economic sectors include military, healthcare, education, and government. The area's largest employer is the U.S. Marines with approximately 43,000 service members assigned to Camp Lejeune. Other major employers include Onslow County Board of Education, County of Onslow, City of Jacksonville, and Onslow Memorial Hospital. The assessment area unemployment rate decreased during the evaluation period. In January 2012, the unemployment rate in the Jacksonville, FL MSA was 8.4 percent. By December 2016, the rate decreased to 5.5 percent. The statewide unemployment rate was 5.2 percent.

Housing

The National Association of Realtors reports a significant increase in housing prices in the Jacksonville, NC MSA, increasing from a median sales price of existing single-family homes of \$137,000 in 2014 to \$152,000 in 2016. Approximately 55 percent of the housing units are owner-occupied.

Community Contacts

A review of community contacts indicated the following identified needs within the community:

- Social services, jobs, job training and education

Opportunities for participation by financial institutions include the following:

- In-kind donations and/or grants
- Donating properties
- Homeowner, credit, and budget counseling

Raleigh, NC MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Raleigh, NC MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	224	7.1	24.6	33.0	33.9	1.3
Population by Geography	1,130,490	6.1	27.0	36.5	30.0	0.4
Housing Units by Geography	446,498	6.0	28.6	35.8	29.6	0.0
Owner-Occupied Units by Geography	276,445	2.5	25.8	38.3	33.4	0.0
Occupied Rental Units by Geography	130,899	12.6	33.0	31.4	22.9	0.0
Vacant Units by Geography	39,154	9.0	33.4	33.2	24.4	0.0
Businesses by Geography	88,205	4.5	23.0	33.6	38.6	0.2
Farms by Geography	2,371	3.5	28.7	41.6	26.1	0.0
Family Distribution by Income Level	273,490	22.2	17.1	20.0	40.7	0.0
Household Distribution by Income Level	407,344	22.8	17.4	18.1	41.7	0.0
Median Family Income MSA - 39580 Raleigh, NC MSA		\$74,783	Median Housing Value			\$219,374
			Median Gross Rent			\$825
			Families Below Poverty Level			7.7%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Raleigh, NC MSA comprises Franklin, Johnston, and Wake counties. The 2017 American Community Survey estimates the population at 1.3 million, an increase from 1.1 million during the 2010 Census.

Employment and Economic Factors

The Raleigh, NC MSA has a well-diversified economy. Key economic sectors include education, government, technology, and healthcare. Raleigh, NC is home to North Carolina State University and it is part of the Research Triangle Park area, which includes Durham (home of Duke University) and Chapel Hill (home of the University of North Carolina at Chapel Hill). The largest employers in the MSA include State of North Carolina (24,739 employees), Wake County Public School System (17,572 employees), and Red Hat (9,800 employees). Other major employers include North Carolina State University and WakeMed. The assessment area unemployment rate decreased during the evaluation period. In January 2012, the unemployment rate was 7.9 percent. By December 2016, the unemployment rate decreased to 4.2 percent. The statewide unemployment rate was 5.2 percent.

Housing

The National Association of Realtors reports a significant increase in housing prices in the Raleigh, NC MSA, increasing from a median sales price of existing single-family homes of

\$209,000 in 2014 to \$248,000 in 2016. The 2016 Housing Affordability Index (HAI)⁹² composite score for the MSA was 182.1. The index measures affordability of housing for a single family earning the median family income to qualify for a mortgage loan to purchase a median priced home. A higher score correlates to a higher affordability level to purchase the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated the following identified needs within the community:

- Affordable housing, gentrification is occurring in affordable housing markets and expiring use HUD properties

Opportunities for participation by financial institutions include the following:

- Unsecured lines of credit for pre-development work of construction projects
- CDFI investments
- Revolving line of credits for non-profits to obtain land or rental properties
- Refinancing product for LIHTC with longer terms

⁹² Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

State of Ohio

Cleveland-Elyria, OH MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Cleveland-Elyria, OH MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	636	16.4	21.2	36.2	25.5	0.8
Population by Geography	2,077,240	10.4	17.4	38.7	33.5	0.0
Housing Units by Geography	952,600	12.7	19.5	38.3	29.5	0.0
Owner-Occupied Units by Geography	575,920	5.7	13.8	42.0	38.5	0.0
Occupied Rental Units by Geography	270,201	21.2	28.5	34.9	15.4	0.0
Vacant Units by Geography	106,479	29.4	27.3	27.2	16.1	0.0
Businesses by Geography	129,455	7.6	13.0	38.5	40.5	0.4
Farms by Geography	3,267	2.5	8.2	44.2	45.1	0.0
Family Distribution by Income Level	535,574	21.7	17.3	20.7	40.3	0.0
Household Distribution by Income Level	846,121	24.9	15.5	17.6	41.9	0.0
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$62,627	Median Housing Value			\$151,321
			Families Below Poverty Level			10.3%
			Median Gross Rent			\$712

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Cleveland-Elyria, OH MSA comprises Cuyahoga, Geauga, Lake, Lorain, and Medina counties. The Cleveland-Elyria, OH MSA is the 33rd most populous metropolitan area in the United States and the largest in the state of Ohio. The 2017 American Community Survey estimates the population at 2,058,844, a slight decrease from the 2010 Census.

Employment and Economic Factors

The Cleveland-Elyria, OH MSA has a well-diversified economy. Key economic sectors include healthcare, government, and education. The area's largest employer is the Cleveland Clinic with approximately 32,000 employees. Other large employers include University Hospital, U.S. Office of Personnel Management, and Lorain County Community College. The assessment area unemployment rate decreased during the evaluation period. In January 2012, the unemployment rate in the Cleveland-Elyria, OH MSA was 7.3 percent. By December 2016, the rate decreased to 5.3 percent. The statewide unemployment rate was 5.0 percent.

Housing

The National Association of Realtors reports a modest increase in housing prices in the Cleveland-Elyria, OH MSA, increasing from a median sales price of existing single-family

homes of \$123,000 in 2014 to \$132,000 in 2016. The 2016 Housing Affordability Index (HAI)⁹³ composite score for the MSA was 286.5. The index measures affordability of housing for a single family earning the median family income to qualify for a mortgage loan to purchase a median priced home. A higher score correlates to a higher affordability level to purchase the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated the following identified needs within the community:

- Workforce development
- Education
- Affordable housing
- Health and human services (safe environment, medical care, transportation)
- Lines of credit
- Capacity building for small business, women, or minority owned businesses
- Second mortgages due to appraisal gaps

Opportunities for participation by financial institutions include the following:

- General operating support
- Volunteers (board/ committee, leadership roles)

⁹³ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

State of Oklahoma
Oklahoma City, OK MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Oklahoma City, OK MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	363	8.8	26.7	38.3	25.1	1.1
Population by Geography	1,252,987	5.5	24.0	41.6	28.7	0.1
Housing Units by Geography	530,813	5.5	26.3	41.7	26.4	0.1
Owner-Occupied Units by Geography	313,278	3.2	18.7	45.0	33.1	0.0
Occupied Rental Units by Geography	157,931	8.7	37.9	36.4	16.9	0.1
Vacant Units by Geography	59,604	9.3	35.8	38.4	16.3	0.1
Businesses by Geography	86,831	5.5	20.1	37.9	35.2	1.3
Farms by Geography	2,746	2.2	15.4	47.3	34.9	0.2
Family Distribution by Income Level	309,578	21.3	17.8	20.6	40.4	0.0
Household Distribution by Income Level	471,209	23.6	16.6	18.1	41.7	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$58,775	Median Housing Value			\$122,327
			Median Gross Rent			\$694
			Families Below Poverty Level			10.5%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Oklahoma City, OK MSA comprises the counties of Canadian, Cleveland, Grady, Lincoln, Logan, McClain, and Oklahoma. The Oklahoma City, OK MSA is located in Central Oklahoma. It is the largest metropolitan area in the state of Oklahoma. The 2017 American Community Survey estimates the population at 1.4 million, an increase from 1.3 million at the 2010 Census.

Employment and Economic Factors

The Oklahoma City, OK MSA has a well-diversified economy. Key economic sectors include government, military, education, and healthcare. The area's largest employer is the State of Oklahoma with approximately 46,000 employees. Other large employers include Tinker Air Force Base, University of Oklahoma-Norman, FAA Mike Maroney Aeronautical Center, and INTEGRIS Health. The assessment area unemployment rate decreased during the evaluation period. In January 2012, the unemployment rate in the Oklahoma City, OK MSA was 5.0 percent. In December 2016, the rate decreased to 3.9 percent. The statewide unemployment rate was 4.8 percent.

Housing

The National Association of Realtors reports a slight increase in housing prices in the Oklahoma City, OK MSA, increasing from a median sales price of existing single-family homes of \$150,000 in 2014 to \$151,000 in 2016. The 2016 Housing Affordability Index (HAI)⁹⁴ composite score for the MSA was 245.9. The index measures affordability of housing for a single family earning the median family income to qualify for a mortgage loan to purchase a median priced home. A higher score correlates to a higher affordability level to purchase the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated the following identified needs within the community:

- Affordable housing and affordable credit products
- Skilled labor in carpentry and maintenance professions

Opportunities for participation by financial institutions include the following:

- Affordable housing down payment assistance and loans
- Financial literacy seminars

⁹⁴ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Tulsa, OK MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Tulsa, OK MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	272	7.4	28.3	36.4	27.9	0.0
Population by Geography	937,478	6.1	25.3	38.2	30.4	0.0
Housing Units by Geography	403,175	6.6	26.9	38.4	28.1	0.0
Owner-Occupied Units by Geography	244,236	3.4	20.9	40.8	34.9	0.0
Occupied Rental Units by Geography	117,522	11.6	36.4	34.0	18.0	0.0
Vacant Units by Geography	41,417	11.4	35.1	36.9	16.6	0.0
Businesses by Geography	71,694	5.5	23.9	34.0	36.7	0.0
Farms by Geography	1,963	2.4	18.3	48.5	30.7	0.0
Family Distribution by Income Level	241,646	21.1	17.9	20.4	40.6	0.0
Household Distribution by Income Level	361,758	23.6	16.7	17.8	41.9	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$58,038	Median Housing Value			\$124,172
			Families Below Poverty Level			10.8%
			Median Gross Rent			\$687

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Tulsa, OK MSA comprises the counties of Creek, Okmulgee, Osage, Pawnee, Rogers, Tulsa, and Wagoner. The metropolitan area is located in northeastern Oklahoma. The city of Tulsa is the principal city. The 2017 American Community Survey estimates the population at 990,773, an increase from 937,478 reported during the 2010 Census.

Employment and Economic Factors

The Tulsa, OK MSA has a well-diversified economy. Key economic sectors include energy, aerospace, telecommunications, and manufacturing. Tulsa is the base for American Airlines' global maintenance hub, which is the city's top employer. Other large employers include ONEOK, Williams Companies, and Dollar Thrifty Automotive Group. The Tulsa, OK MSA gross domestic product (GDP) represents about 30 percent of the state of Oklahoma's economy. The assessment area unemployment rate decreased during the evaluation period. In January 2012, the unemployment rate in the Tulsa, OK MSA was 6.1 percent. By December 2016, the rate decreased to 4.8 percent. The state unemployment rate was 4.8 percent.

Housing

The National Association of Realtors reports moderate increases in housing prices in the Tulsa, OK MSA. The median sales price of existing single-family homes increased from \$146,000 in 2014 to \$151,000 in 2016. The 2016 Housing Affordability Index (HAI)⁹⁵ composite

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score for the MSA was 233.2. The index measures affordability of housing for a single family earning the median family income to qualify for a mortgage loan to purchase a median priced house. A higher score correlates to a higher affordability level to purchase the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated the following identified needs within the community:

- Community development services

Opportunities for participation by financial institutions include the following:

- Community development investments to sponsor events
- Financial literacy training

State of Oregon
Bend-Redmond, OR MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Bend-Redmond, OR MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	0.0	16.7	62.5	20.8	0.0
Population by Geography	157,733	0.0	15.7	64.3	20.0	0.0
Housing Units by Geography	78,004	0.0	16.4	64.3	19.4	0.0
Owner-Occupied Units by Geography	42,982	0.0	11.8	65.0	23.2	0.0
Occupied Rental Units by Geography	20,208	0.0	30.2	57.6	12.2	0.0
Vacant Units by Geography	14,814	0.0	10.8	71.1	18.1	0.0
Businesses by Geography	16,990	0.0	19.4	57.3	23.3	0.0
Farms by Geography	707	0.0	12.2	55.3	32.5	0.0
Family Distribution by Income Level	43,434	19.7	17.3	23.5	39.5	0.0
Household Distribution by Income Level	63,190	22.1	17.4	20.3	40.2	0.0
Median Family Income MSA - 13460 Bend-Redmond, OR MSA		\$61,605	Median Housing Value			\$327,842
			Median Gross Rent			\$887
			Families Below Poverty Level			7.6%
<i>Source: 2010 U.S. Census and 2016 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>						

The Bend-Redmond, OR MSA comprises Deschutes County. According to the 2010 census, the population totaled 157,733 in the MSA. The largest cities within the MSA at the time of the 2010 census were Bend and Redmond with populations of 76,565 and 26,215, respectively. The Census estimates the population to have increased to 181,307 as of July 1, 2016.

Employment and Economic Factors

According to Moody's Analytics, the assessment area is in the expansion phase of the business cycle. The unemployment rate was 4.5 percent as of December 2016, which reflects a significant decline from 13.1 percent as of January 2012. The unemployment rate continues to decrease given the tight labor market, which is slowing job growth. The upside of the tight labor market is higher wages. Average hourly earnings still lag those in the rest of Oregon and the U.S., but in both cases, the gap is closing. Additionally, job creation is superior, and wage and salary income is rising far faster in the assessment area than in the state and the nation. People are flocking to the metro area at the fastest pace in a decade thanks to the vigorous expansion of technology firms.

Housing

Strong population and income trends along with the presence of Oregon State University-Cascades expect to cause large gains in new residential construction and housing-related employment. Permitting has risen only modestly despite prices rising faster than prices in the state and in rest of the nation. Developers are building single-family homes at about half of their prerecession rate in the assessment area. Multifamily building has increased, but it is not enough to satiate demand. The housing supply crunch is in part due to regulations. Additionally, state conservation land borders the city of Bend, which limits new development.

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Affordable housing both for rent and purchase
- Training programs to equip the existing workforce with the knowledge and skills necessary to meet the demands of the growing and evolving job market

Opportunities for participation by financial institutions include the following:

- Supporting community development organizations serving in the assessment area by volunteering to teach financial literacy classes as well as to serve on loan and other committees
- Providing grants to nonprofit organizations and community development organizations
- Investing in Low-Income Housing Tax Credit certified projects or funding on other affordable housing projects
- Developing affordable deposit accounts, individual development accounts, and responsible alternatives to payday loans
- Participating in the state tax credit program that promotes activities that benefit low- and moderate-income individuals such as the funding of Individual Development Accounts
- Providing support to “ID clinics” which help individuals obtain the necessary legal identification so that they can open bank accounts and obtain other important services
- Implementing programs and products to reach the minority community such as credit building classes and second chance checking accounts

Eugene, OR MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Eugene, OR MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	86	2.3	22.1	53.5	22.1	0.0
Population by Geography	351,715	2.9	21.4	53.7	22.0	0.0
Housing Units by Geography	154,121	3.0	23.0	52.7	21.2	0.0
Owner-Occupied Units by Geography	87,469	1.4	16.5	57.9	24.2	0.0
Occupied Rental Units by Geography	56,425	5.5	31.4	45.3	17.8	0.0
Vacant Units by Geography	10,227	4.0	32.6	49.3	14.1	0.0
Businesses by Geography	25,845	3.5	27.0	45.3	24.1	0.0
Farms by Geography	1,122	2.0	13.7	64.2	20.1	0.0
Family Distribution by Income Level	86,947	21.3	18.1	21.0	39.6	0.0
Household Distribution by Income Level	143,894	24.2	16.5	17.0	42.3	0.0
Median Family Income MSA - 21660 Eugene, OR MSA		\$55,817	Median Housing Value			\$235,160
			Families Below Poverty Level			10.0%
			Median Gross Rent			\$766

Source: 2010 U.S. Census and 2016 D&B Data
Due to rounding, totals may not equal 100.0

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

The Eugene, OR MSA comprises Lane County. According to the 2010 census, the population totaled 351,715 in the MSA. The largest cities within the MSA at the time of the 2010 census were Eugene and Springfield with populations of 156,185 and 59,403, respectively. The Census estimated that the population increased to 369,519 as of July 1, 2016.

Employment and Economic Factors

According to Moody's Analytics, the assessment area is in the expansion phase of the business cycle. Job growth in the assessment area is exceeding the U.S. average. Job gains are primarily in healthcare and construction and these additions have helped push the unemployment rate to a historically low level of about 4.4 percent in December 2016. The tight labor market is giving workers more bargaining power, which, along with job creation that is faster than average, is helping push up average hourly earnings.

Housing

House prices and construction employment are growing well over the national pace as the assessment area has experienced an influx of residents thanks to the statewide tech boom. Although job seekers have primarily flooded areas around Portland, Oregon, the assessment area is an attractive, cheaper alternative. Population growth has exploded over the past three years, accelerating from about 0.2 percent in 2013 to 1.9 percent in 2016, the largest annual gain since 1990. Rapid household formation will bolster housing demand, encouraging more homebuilding and hiring in construction. Housing supply has been slow to accommodate the

surge in demand. Single-family housing permits remain well below their prerecession peak. As demand outpaces supply, house price growth will remain elevated. According to the Federal Housing Finance Agency, house prices are climbing at their fastest rate since 2006. The 10 percent year-over-year increase is almost twice the increase nationally.

The National Association of Realtors' 2016 Housing Affordability Index (HAI)⁹⁶ composite score for the MSA was 143.1. The index measures affordability of housing for a single family earning the median family income to qualify for a mortgage loan to purchase a median priced house. A higher score correlates to a higher affordability level to purchase the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of the community needs assessment indicated that the following are identified needs within the community:

- Funding for start-up wineries and breweries
- Funding for the expansion of existing businesses for example, loans to purchase equipment

Opportunities for participation by financial institutions include the following:

- Financial literacy training programs

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State of Pennsylvania

Pittsburgh, PA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Pittsburgh, PA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	711	6.5	25.7	45.4	20.4	2.0
Population by Geography	2,356,285	4.1	21.4	47.7	26.4	0.4
Housing Units by Geography	1,101,793	4.7	23.9	48.0	23.3	0.0
Owner-Occupied Units by Geography	702,132	2.1	19.2	50.8	27.8	0.0
Occupied Rental Units by Geography	283,253	8.7	30.8	44.0	16.5	0.0
Vacant Units by Geography	116,408	10.8	35.1	40.9	13.0	0.1
Businesses by Geography	160,909	4.2	16.5	47.0	31.7	0.6
Farms by Geography	3,848	1.3	14.1	58.5	26.0	0.1
Family Distribution by Income Level	619,201	20.4	18.1	21.9	39.6	0.0
Household Distribution by Income Level	985,385	24.9	15.9	17.2	42.0	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$62,376	Median Housing Value			\$123,872
			Median Gross Rent			\$655
			Families Below Poverty Level			8.2%
<i>Source: 2010 U.S. Census and 2016 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>						

The Pittsburgh, PA MSA comprises Allegheny, Armstrong, Beaver, Butler, Fayette, Washington, and Westmoreland counties in Pennsylvania.

Employment and Economic Factors

The assessment area has a well-diversified economy. Key economic sectors include healthcare, education, technology, bioscience, and financial services. Pittsburgh is known as “The Steel City” for its history in the steel industry and several steel companies such as US Steel, Ampco Pittsburgh, and Allegheny Technologies who operate steel mills in the MSA. The area is home to The University of Pittsburgh, Duquesne University, and Carnegie Mellon University. The area’s largest employers include UPMC Health System, Highmark Inc. (health insurance), The PNC Financial Services Group, Inc., University of Pittsburgh, and Giant Eagle, Inc. (grocery store). According to the Bureau of Labor Statistics, the unemployment rate in Pittsburgh has improved from a high of 9.5 percent in early 2010 to 5.1 percent in December 2016.

Housing

The U.S. Department of Housing and Urban Development (HUD) divides the assessment area into three submarkets when assessing the housing sales market: Allegheny County, North,

and South. As of April 2016, according to HUD, the average sales price of new and existing homes in the Allegheny submarket was \$179,900, up 6 percent over the previous 12 months. In the North submarket, the average sales price of new and existing homes was \$173,000, up 1 percent over the previous 12 months. In the South submarket, the average price of new and existing home sales was \$149,400, up 5 percent over the previous 12 months. According to a July 2016 Bloomberg article, in an assessment of 100 metro markets, Pittsburgh is the second most affordable market to purchase your first home.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing
- Improved infrastructure
- Housing rehabilitation
- Improved public transportation

Opportunities for participation by financial institutions include the following:

- Participation in housing projects
- Flexible mortgage products

State of South Carolina

Charleston-North Charleston, SC MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Charleston-North Charleston, SC MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	156	5.8	25.6	42.3	25.0	1.3
Population by Geography	664,607	4.0	22.8	46.9	26.3	0.0
Housing Units by Geography	289,861	4.4	22.4	45.6	27.7	0.0
Owner-Occupied Units by Geography	162,865	1.7	18.3	48.7	31.3	0.0
Occupied Rental Units by Geography	83,073	9.2	29.1	44.6	17.0	0.0
Vacant Units by Geography	43,923	5.1	24.8	35.7	34.5	0.0
Businesses by Geography	42,032	4.7	23.0	40.5	31.8	0.0
Farms by Geography	1,044	3.1	18.2	51.0	27.8	0.0
Family Distribution by Income Level	160,847	21.7	17.1	20.4	40.8	0.0
Household Distribution by Income Level	245,938	23.9	15.8	19.1	41.3	0.0
Median Family Income MSA - 16700 Charleston-North Charleston, SC MSA		\$60,579	Median Housing Value			\$245,856
			Families Below Poverty Level			10.5%
			Median Gross Rent			\$894

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Charleston-North Charleston, SC MSA comprises Berkeley, Charleston, and Dorchester counties in South Carolina. Principal cities include Charleston, North Charleston, and Summerville commonly known as the Tri-County Area. According to a community contact, Charleston County is generally more affluent and urban, while Berkeley County is more rural with more low- and moderate-income individuals. Dorchester County represents more middle-income with both rural and urban areas.

Employment and Economic Factors

The assessment area has a diversified economy. Key economic sectors include tourism, higher education, shipping, the military, and a growing technology industry. According to a recent article in the Huffington Post, Charleston's technology industry is growing 26 percent faster than the national average. The MSA is home to several schools of higher education including the Medical University of South Carolina, the College of Charleston, Charleston School of Law, The Citadel, and The Military College of South Carolina. It is also home to Joint Base Charleston, which is a joint military base for the US Navy and Air Force. The area's largest employers include the Joint Base Charleston, Medical University of South Carolina, Boeing South Carolina, Charleston County Public Schools, and Roper St. Francis Healthcare. The unemployment rate has improved from a high of 10.1 percent in 2010 to 4.6 percent in

June 2016. This is slightly better, but trending similarly to the rest of South Carolina, which improved from a high of 11.7 percent in 2010 to 4.9 percent in June 2016.

Housing

The National Association of Realtors reports an increase in housing prices in the assessment area. In 2014, the median sales price of existing single-family homes in the MSA was \$228,200 and increased to \$260,100 in June 2016. The 2016 Housing Affordability Index (HAI)⁹⁷ composite score for the MSA was 158.2. The index measures affordability of housing for a single family earning a median family income necessary to qualify for a mortgage loan to purchase a median priced house. The higher the score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Mortgage lending

Opportunities for participation by financial institutions include the following:

- Partner with non-profit organization to help small businesses with business advice and funding
- Provide funding to non-profit organization that help small businesses, especially in the more rural areas of the assessment area
- Provide more variety of mortgage products

⁹⁷ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Columbia, SC MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Columbia, SC MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	191	5.2	30.4	34.0	27.7	2.6
Population by Geography	767,598	3.6	27.8	36.1	30.2	2.3
Housing Units by Geography	322,491	3.9	30.2	36.7	29.1	0.1
Owner-Occupied Units by Geography	197,959	1.0	26.1	38.7	34.2	0.0
Occupied Rental Units by Geography	89,825	9.5	36.1	34.0	20.2	0.2
Vacant Units by Geography	34,707	5.5	38.7	32.2	23.2	0.4
Businesses by Geography	41,043	2.6	23.9	39.3	33.4	0.8
Farms by Geography	1,221	0.9	33.3	36.6	29.2	0.0
Family Distribution by Income Level	187,576	21.8	17.5	20.4	40.4	0.0
Household Distribution by Income Level	287,784	23.7	16.7	18.0	41.7	0.0
Median Family Income MSA - 17900 Columbia, SC MSA		\$60,605	Median Housing Value			\$144,427
			Median Gross Rent			\$758
			Families Below Poverty Level			9.9%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Columbia, SC MSA comprises Calhoun, Fairfield, Kershaw, Lexington, Richland, and Saluda counties in South Carolina. The Columbia, SC MSA is located centrally within the state of South Carolina. The city of Columbia is the principal city and it is the state’s capital. The Columbia, SC MSA became the state’s second largest metropolitan area when OMB combined the Anderson and Greenville metropolitan areas during the 2010 census.

Employment and Economic Factors

The assessment area has a diversified economy. Key economic sectors include manufacturing, professional and business services, finance, insurance, and real estate. The assessment area is also home to the University of South Carolina. Additionally, Fort Jackson in Columbia is the largest and most active Initial Entry Training Center, training 54 percent of the US Army’s Basic Combat Training load. The largest employers in the MSA include the State of South Carolina, Palmetto Health Alliance, University of South Carolina, Fort Jackson, and Blue Cross Blue Shield of SC. The unemployment rate has improved from a high of 10 percent in 2010 to 5 percent in June 2016. This is similar to the rest of South Carolina, which improved from a high of 11.7 percent in 2010 to 4.9 percent in June 2016.

Housing

The National Association of Realtors reports an increase in housing prices in the assessment area. In 2014, the median sales price of existing single-family homes in the MSA was

\$150,400 and increased to \$165,500 in June 2016. The 2016 Housing Affordability Index (HAI)⁹⁸ composite score for the MSA was 227.6. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced house. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing
- Education attainment
- Food attainment
- Higher wage jobs

Opportunities for participation by financial institutions include the following:

- Simplify processes for programs such as the FHLB money available to local flood victims through local banks
- Additional financial support to local groups supporting the community

⁹⁸ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

State of Tennessee
Memphis, TN-MS-AR MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Memphis, TN-MS-AR MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	245	22.0	22.4	24.1	29.4	2.0
Population by Geography	1,027,138	15.3	22.1	24.9	37.2	0.5
Housing Units by Geography	434,142	17.6	22.8	24.8	34.7	0.0
Owner-Occupied Units by Geography	237,031	9.4	18.2	26.0	46.4	0.0
Occupied Rental Units by Geography	138,145	26.3	28.0	24.8	20.9	0.0
Vacant Units by Geography	58,966	30.3	29.2	20.5	20.0	0.0
Businesses by Geography	54,668	10.8	18.9	23.5	45.9	0.9
Farms by Geography	1,357	6.3	13.6	32.4	47.3	0.4
Family Distribution by Income Level	249,976	24.7	16.0	17.0	42.3	0.0
Household Distribution by Income Level	375,176	25.2	15.8	16.8	42.2	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MSA		\$56,100	Median Housing Value			\$140,559
			Families Below Poverty Level			15.0%
			Median Gross Rent			\$777

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Memphis, TN-MS-AR MSA comprises Fayette, Shelby, and Tipton counties in Tennessee. The bank defined its assessment area to exclude DeSoto and Marshall Counties in Mississippi and Crittenden County in Arkansas. The city of Memphis is located within Shelby County in Tennessee.

Employment and Economic Factors

The assessment area's primary economic sector is shipping and transportation. The assessment area is located along the Mississippi River and it is home to the second largest cargo airport in the world and the third largest rail center. Headquartered in the MSA, FedEx is the area's largest employer. In addition to FedEx, two other Fortune 500 companies have headquarters in the assessment area: AutoZone and International Paper. Other key economic sectors include manufacturing, banking and finance, and real estate. Tourism is also strong with Elvis Presley's Graceland located in the assessment area. The assessment area is also home to several colleges and universities, including the University of Memphis. According to the Memphis Business Journal as of July 2017, the area's largest employers were FedEx Corp., Tennessee State Government, United States Government, Methodist Le Bonheur Healthcare, and Shelby County Schools. Unemployment is improving in the assessment area from a high of 10.1 percent in June 2011 to 5.9 percent in June 2016. This varies from the rest of

Tennessee, which saw peak unemployment of 11 percent in 2009 fall to 4.7 percent in June 2016.

Housing

The National Association of Realtors reports an increase in housing prices in the assessment area. In 2014, the median sales price of existing single-family homes in the MSA was \$138,600 and increased to \$160,800 in June 2016. The 2016 Housing Affordability Index (HAI)⁹⁹ composite score for the MSA was 218.7. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced house. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts and other sources indicated that the following are needs within the community:

- Small business lending
- Reaching the unbanked
- Affordable housing

Opportunities for participation by financial institutions include the following:

- Partner with non-profits
- Financial literacy education and outreach for the unbanked

⁹⁹ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Nashville-Davidson-Murfreesboro-Franklin, TN MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Nashville-Davidson-Murfreesboro-Franklin, TN MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	380	8.4	21.6	42.1	26.8	1.1
Population by Geography	1,670,890	6.8	20.9	42.8	29.2	0.3
Housing Units by Geography	687,243	7.2	22.4	43.1	27.3	0.0
Owner-Occupied Units by Geography	431,054	3.3	17.3	46.4	33.1	0.0
Occupied Rental Units by Geography	197,819	14.5	31.2	37.2	17.0	0.0
Vacant Units by Geography	58,370	11.2	30.3	38.8	19.8	0.0
Businesses by Geography	111,154	7.2	20.6	34.9	36.5	0.9
Farms by Geography	3,223	2.4	19.7	50.3	27.3	0.3
Family Distribution by Income Level	418,377	20.5	18.0	21.4	40.1	0.0
Household Distribution by Income Level	628,873	22.9	16.6	19.0	41.4	0.0
Median Family Income MSA - 34980 Nashville-Davidson--Murfreesboro--Franklin, TN MSA		\$62,315	Median Housing Value			\$185,774
			Median Gross Rent			\$772
			Families Below Poverty Level			9.6%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Nashville-Davidson-Murfreesboro-Franklin, TN MSA comprises Cannon, Cheatham, Davidson, Dickson, Hickman, Macon, Maury, Robertson, Rutherford, Smith, Sumner, Trousdale, Williamson, and Wilson counties in Tennessee. The MSA is largest in the state of Tennessee and the 36th largest MSA in the U.S.

Employment and Economic Factors

The assessment area has a diversified economy. Key economic sectors include health care, music and entertainment, manufacturing, and tourism. The assessment area is home to the Vanderbilt University and Middle Tennessee University. It also has the highest concentration of musicians and music businesses in the nation with more than 190 recording studios and over 5,000 working musicians from all genres. The largest employers in the MSA include Vanderbilt University Medical Center, HCA Holdings, Nissan North America, Saint Thomas Health, and Vanderbilt University. The unemployment rate has improved from a high of 10.4 percent in 2009 to 4.2 percent in June 2016. This is similar to the rest of Tennessee, which improved from a high of 11 percent in 2009 to 4.7 percent in June 2016.

Housing

The National Association of Realtors reports an increase in housing prices in the assessment area. In 2014, the median sales price of existing single-family homes in the MSA was \$183,000 and increased to \$227,000 in June 2016. The 2016 Housing Affordability Index

(HAI)¹⁰⁰ composite score for the MSA was 174.6. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable housing
- Small business lending
- Small dollar consumer lending

Opportunities for participation by financial institutions include the following:

- Involvement in community development projects
- Support to nonprofits organizations

¹⁰⁰ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

State of Texas

Austin-Round Rock, TX MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Austin-Round Rock, TX MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	350	10.3	24.6	35.1	29.1	0.9
Population by Geography	1,716,289	10.7	23.9	34.8	30.4	0.1
Housing Units by Geography	676,169	10.5	23.4	35.7	30.4	0.0
Owner-Occupied Units by Geography	367,502	4.3	18.4	38.9	38.5	0.0
Occupied Rental Units by Geography	252,571	18.5	29.8	32.0	19.8	0.0
Vacant Units by Geography	56,096	15.9	27.3	31.9	25.0	0.0
Businesses by Geography	148,749	6.3	17.9	30.6	45.1	0.1
Farms by Geography	3,341	3.8	20.8	36.9	38.5	0.0
Family Distribution by Income Level	388,214	21.6	17.4	20.0	41.0	0.0
Household Distribution by Income Level	620,073	23.2	16.9	18.1	41.8	0.0
Median Family Income MSA - 12420 Austin-Round Rock, TX MSA		\$71,602	Median Housing Value			\$204,319
			Families Below Poverty Level			9.0%
			Median Gross Rent			\$920
<p>Source: 2010 U.S. Census and 2016 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.</p>						

The Austin-Round Rock, TX MSA comprises Bastrop, Caldwell, Hays, Travis, and Williamson counties. Principal cities include Austin, Round Rock, Cedar Park, Georgetown, San Marcos, Pflugerville, Leander, Kyle, and Hutto. The Austin Round Rock, TX MSA, commonly referred to as Greater Austin, is located in central Texas. Austin is the principal city in the MSA, the fourth largest city in Texas and 11th largest in the U.S. The Austin-Round Rock, TX MSA is the 35th largest metropolitan area in the U.S.

Employment and Economic Factors

Greater Austin has a diverse economy heavily anchored by the business and services sector led by high-tech and Internet-based companies, government activities, and education. Most of the area's largest employers are all within the city of Austin. These include Advanced Micro Devices, Apple, Inc., Austin ISD, The City of Austin, Freescale Semiconductor, IBM, Seton Healthcare Network, Texas state government, the United States government, and the University of Texas at Austin. Major employers outside of the city of Austin include Dell, MD Totco, Southwestern University, and Texas State University.

Based on data from the Bureau of Labor Statistics for January 2012, the unemployment rates in the Austin-Round Rock, TX MSA was 6.2 percent. In December 2016, the unemployment rate in the MSA decreased to 3.2 percent. In 2016, new hires contributed 23,000 jobs to

staffing levels. High-tech and Internet-based companies plan to add over 1,500 new jobs to the metro area by 2020. Other growing employment sectors in Austin are information and financial activities and education and health services. Austin employment continues to expand with an additional 36,000 new positions expected in 2017, representing a 3.6 percent growth.

Housing

In the Austin-Round Rock, TX MSA, the cost of living is greatly affected by the price of housing. The National Association of Realtors reports that the median price of a single-family home at December 31, 2014, was \$240,700 for the Austin-Round Rock TX MSA. As of December 31, 2016, this value rose to \$284,000, while the national median price was \$235,500. A strong technology sector and an influx of young talent is creating a stronger-than-anticipated housing demand in Austin. According to Freddie Mac, the housing demand outpaced supply in 2016, keeping vacancy rates below the historical average. With the high-demand and increased home prices, owner-occupied sales are softening, pricing first-time buyers among the market.

According to the Department of Numbers, the median monthly gross residential rent in the Austin-Round Rock, TX MSA in 2012 was \$981, increasing to \$1,131 in 2015. In 2016, single-family rents jumped 3.9 percent. The City of Austin reported in their 2014 Comprehensive Housing Market Analysis, that the growing market and increased rent prices has increased competition among low- and moderate-income renters for non-luxury rental units, pushing vacancy rates down to record low levels. Given the overall high monthly gross residential rent, housing affordability continues to be a significant issue in the assessment area.

The 2016 Housing Affordability Index (HAI)¹⁰¹ composite score for the MSA was 162.2. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1.

Community Contacts

There are numerous opportunities in the area to participate in community development activities. Multiple well-established community development entities, including community development corporations, community development financial institutions (CDFIs), nonprofit entities, and governmental and quasi-governmental organizations serve the community focusing on areas such as affordable housing, economic development, asset development and financial education, community services, and youth programs.

¹⁰¹ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Community contacts have identified the following credit and community development needs within this MSA:

- Financial literacy is the highest need
- Create affordable mortgage lending products that provide long-term affordability options for low- to moderate-income borrowers
- Good opportunities exist to make community development investments and loans in the MSA. At least four CDFIs are actively operating in Austin. Most are large CDFIs and offer various community development opportunities

Opportunities for participation by financial institutions include the following:

- Support to provide financial literacy programs to low- and moderate-income individuals and loans to small businesses
- Support the City of Austin's community land trust
- Small business lending

Dallas-Fort Worth-Arlington, TX MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Dallas-Fort Worth-Arlington, TX MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,324	11.3	25.5	30.5	32.4	0.3
Population by Geography	6,426,214	9.6	24.7	32.2	33.5	0.0
Housing Units by Geography	2,459,931	10.0	24.5	33.5	32.0	0.0
Owner-Occupied Units by Geography	1,404,368	4.6	19.3	34.3	41.7	0.0
Occupied Rental Units by Geography	823,996	17.3	31.4	32.6	18.7	0.0
Vacant Units by Geography	231,567	17.0	31.0	31.3	20.7	0.0
Businesses by Geography	516,007	7.0	18.5	29.5	44.8	0.2
Farms by Geography	10,534	4.5	16.7	37.5	41.3	0.0
Family Distribution by Income Level	1,546,770	22.4	16.9	18.8	41.8	0.0
Household Distribution by Income Level	2,228,364	23.2	16.8	18.0	42.0	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX MD		\$67,175	Median Housing Value			\$163,360
Median Family Income MSA - 23104 Fort Worth-Arlington, TX MD		\$64,976	Median Gross Rent			\$872
			Families Below Poverty Level			10.2%

*Source: 2010 U.S. Census and 2016 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.)*

The Dallas-Fort Worth-Arlington, TX MSA comprises the following fourteen counties: Collin, Dallas, Delta, Denton, Ellis, Hood, Hunt, Johnson, Kaufman, Parker, Rockwall, Somervell, Tarrant, and Wise. Primary cities include Dallas, Fort Worth, Arlington, Plano, Garland, Irving, Grand Prairie, McKinney, Frisco, Mesquite, Carrollton, Denton, Richardson, and Lewisville. The Dallas-Fort Worth-Arlington, TX MSA is the economic and central hub of north central Texas and it is the largest inland metropolitan area in the U.S. According to the 2017 American Community Survey, the population is 7.4 million, a 15 percent increase since the 2010 census.

Employment and Economic Factors

The Dallas-Fort Worth-Arlington, TX MSA economy continues to be a key driver of business activity in Texas. The area's business complex is diverse, primarily based on banking, commerce, telecommunications, technology, energy, healthcare and medical research, major defense manufacturers, and transportation and logistics. The MSA has been a magnet for corporate headquarters and major company organizations. According to the Dallas Regional Chamber of Commerce and the Fort Worth Chamber of Commerce, the MSA had the fourth highest concentration of Fortune 500 headquarters in the United States in 2016. The companies included ExxonMobil, Texas Instruments, AT&T, American Airlines, Energy Transfer Equity, Tenet Healthcare, Southwest Airlines, HollyFrontier, Kimberly-Clark, Fluor, J. C. Penny, Dean Foods, Alliance Data Systems Corporation, Dr. Pepper Snapple Group, Commercial Metals, Celanese, and Energy Future Holdings. In 2016, major corporate headquarters relocations to the MSA included Toyota USA and Jacobs Engineering.

Agriculture is also a primary driver of the Dallas-Fort Worth-Arlington, TX MSA economy. The Texas farming and ranching industry exists in Fort Worth, Collin, Dallas, Ellis, Hunt, Kaufman, and Rockwall counties, known for their fertile black soil, temperate weather, and available irrigation water are also well suited to a variety of agricultural enterprises, including a variety of livestock operations and more than twenty-five commercial crops. Agriculture in the area ranges from wine grape and cherry production to elk and organic beef.

Based on data from the Bureau of Labor Statistics, in January 2012, the unemployment rate in the Dallas-Fort Worth-Arlington, TX MSA was 7.1 percent. In December 2016, the unemployment rate decreased to 3.7 percent.

Housing

The cost of living in the area is high and it affects borrowing ability. According to HUD, the sales housing market in the Dallas-Fort Worth-Arlington, TX MSA is tight. Recent strong employment and population growth in the MSA contributed to increased sales demand. The shortage of existing homes in the MSA has increased rapidly since 2012. New home sales in the MSA have steadily increased as the economy has improved, but are constrained by a limited number of developable lots.

The National Association of Realtors reports that the median price of a single-family home at December 31, 2014, was \$188,300 for the Dallas-Fort Worth-Arlington, TX MSA. As of December 31, 2016, this value rose to \$227,100. Given the overall high median home price and due to a shortage of existing homes available for sale, housing affordability continues to be a significant issue in the assessment area.

According to HUD, in 2016, the average price of a new single-family home in the city of Dallas was \$541,200, an increase of \$87,300, or more than 19 percent from the previous 12 months. In Fort Worth-Arlington, the average price for new homes increased by \$21,000 or 8 percent to \$281,300 during the 12 months ending April 2016. While compared with the average price a year earlier, existing homes sold for an average price of \$229,800, up by \$16,850, or 8 percent. HUD also reported during the third quarter of 2015 that the average rent for an apartment in the MSA was \$998, an increase of \$72, or nearly 8 percent, from third quarter of 2014. Average year-over-year rent growth in the MSA has exceeded 4 percent since 2012.

The 2016 Housing Affordability Index (HAI)¹⁰² composite score for the MSA was 179.7. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

The MSA includes numerous opportunities for banks to participate in community development activities. Multiple well-established community development entities serve the area, including community development corporations, community development financial institutions (CDFIs),

¹⁰² Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

nonprofit entities, and governmental and quasi-governmental organizations focused on areas such as affordable housing, economic development, asset development and financial education, community services, and youth programs.

Community contacts have identified the following credit and community development needs within this MSA:

- Affordable housing stock is not readily available, less than 500 units are “move-in” ready
- Affordable mortgage products that combines home improvements and purchase in one loan closing, such as the 203K
- Funding to acquire land along with construction lines of credit

Opportunities for participation by financial institutions include the following:

- Financing to provide affordable housing (e.g., First Time Home Buyer programs)
- Gap funding, or grants and donations for the purpose of funding operating costs and program costs associated with financial literacy programs and Home Buyer Training seminars
- Real estate opportunities throughout Dallas
- Serve as presenters during the homebuyer training
- Build relationships with nonprofits and provide support for homeownership fairs and financial education
- Train bank loan officers at their respective banks, on nonprofit products and services to help increase the bank’s knowledge of available loan alternatives, instead of saying no to a loan applicant

Houston-The Woodlands-Sugar Land, TX MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Houston-The Woodlands-Sugar Land, TX MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,069	12.3	28.6	27.0	31.5	0.6
Population by Geography	5,920,416	9.3	26.0	29.0	35.3	0.3
Housing Units by Geography	2,216,211	10.5	26.1	28.3	35.2	0.0
Owner-Occupied Units by Geography	1,239,699	4.0	21.2	30.4	44.4	0.0
Occupied Rental Units by Geography	717,963	19.1	32.4	25.3	23.2	0.0
Vacant Units by Geography	258,549	17.5	32.3	26.4	23.7	0.0
Businesses by Geography	444,726	8.0	19.3	25.3	47.4	0.1
Farms by Geography	7,849	4.3	17.8	33.6	44.2	0.0
Family Distribution by Income Level	1,392,645	23.7	16.5	17.6	42.2	0.0
Household Distribution by Income Level	1,957,662	24.2	16.4	16.9	42.5	0.0
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$63,898	Median Housing Value			\$155,527
			Families Below Poverty Level			11.8%
			Median Gross Rent			\$853

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Houston-The Woodlands-Sugar Land, TX MSA comprises the following nine counties: Austin, Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller. The MSA is located in southeastern Texas and contains four principal cities and one community: Houston, Sugar Land, Conroe, Baytown, and The Woodlands (community). Harris County, which contains the city of Houston, is the third-most populous county in the nation. The Houston-The Woodlands-Sugar Land, TX MSA is the largest economic and cultural center of the South. The 2017 American Community Survey estimates the MSA population at 6.9 million, a 16 percent increase from the 2010 census.

Employment and Economic Factors

The Houston-The Woodlands-Sugar Land, TX MSA economy has a broad industrial base in energy, manufacturing, aeronautics, healthcare, and transportation. Houston, known as the Energy Capital, leads in building oilfield equipment, and it is home to more than 5,000 related firms. From December 2014 to December 2016, Houston's upstream energy sector shed 81,100 jobs, equivalent to one in every four jobs in the sector. Two-thirds of those losses occurred in 2015, with the remainder in 2016. Oil prices have somewhat stabilized allowing the energy industry to settle into a slow recovery. The Port of Houston is the 10th largest port in the world. Houston has the largest medical center in the world. The Texas Medical Center and the Harris County Independent School Districts employ a significant number of persons. Other major employers in the Houston MSA include Walmart, H-E-B, Memorial Hermann Health System, The University of Texas MD Anderson Cancer Center, McDonald's Corp, Kroger, Shell Oil, Exxon Oil, CenterPoint Energy, United Airlines, and local and government offices.

Based on January 2012 data from the Bureau of Labor Statistics, the unemployment rate in the Houston-The Woodlands-Sugar Land, TX MSA was 7.2 percent. In December 2016, the unemployment rate decreased to 5.3 percent. Homelessness and middle-skill level job training are big issues for the city and organizations are collaborating their efforts. While Houston's unemployment rate is low when compared to the rest of the country, many people are underemployed and need additional skills to make a livable wage.

Housing

In the Houston-The Woodlands-Sugar Land, TX MSA, the price of housing greatly affects the cost of living. Recent strong employment and population growth in the MSA contributed to increased sales demand for single-family homes. The National Association of Realtors reports that the median price of a single-family home at December 31, 2014, was \$198,400. As of December 31, 2016, this value rose to \$222,500. Given the overall high median home price and high demand, housing affordability continues to be a significant issue in the assessment area.

The 2016 Housing Affordability Index (HAI)¹⁰³ composite score for the MSA was 186.2. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Housing inventory has dropped by 74 percent in the last four years, according to data from Trulia. In the greater Houston region, single-family housing stock available under \$200,000 has largely disappeared, squeezing out many first-time homebuyers and other members of the middle-class who in previous years might have found Houston well stocked with affordable homes. According to the Federal Reserve Bank of Dallas, more than 10 percent of Harris County homeowners put more than 50 percent of their income toward housing costs. The drop in homeownership rates is pushing more people to renting, driving up rent prices. CBRE, a Los Angeles-based real estate brokerage firm with offices in Houston, reported that at a 4.9 percent rate, rents are growing at the fastest pace on record. In June of 2017, the annual report from Harvard University's Joint Center on Housing Studies reported that more than 80 percent of households making less than \$15,000 per year and 77 percent of households that make between \$15,000 and \$30,000 a year pay more than 30 percent of their income in rent, meeting the definition of "cost burdened."

Community Contacts

Numerous opportunities exist in the area to participate in community development activities. Multiple well-established community development entities serve the area, including community development corporations, community development financial institutions (CDFIs), nonprofit entities, governmental and quasi-governmental organizations focused on areas such as affordable housing, economic development, asset development and financial education, community services, and youth programs.

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Community contacts have identified the following credit and community development needs within this MSA:

- Agriculture program for community gardens to help make the cost of transporting produce to the cities more affordable
- Affordable owner-occupied and rental units
- Funding for small builders to construct affordable new home developments
- Construction/rehab funding to help rebuild housing in major designated disaster areas
- Financial education that includes greater bank involvement and user friendly materials
- Foreclosure assistance
- Funding to support healthy food choices and community gardens
- Down payment and closing cost assistance such as funding for IDA programs

Opportunities for participation by financial institutions include the following:

- Provide assistance through the Homestead Exemption Filing Program
- Scholarship programs to help increase graduation rates and higher education
- Provide assistance to help create land bank program
- Expand bank relationships beyond tellers by creating exposure to other bank personnel and products

San Antonio-New Braunfels, TX MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: San Antonio-New Braunfels, TX MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	457	8.1	27.8	33.0	30.2	0.9
Population by Geography	2,142,508	6.4	28.1	34.1	31.5	0.0
Housing Units by Geography	810,455	6.1	27.4	35.6	30.9	0.0
Owner-Occupied Units by Geography	476,402	4.2	22.8	35.9	37.1	0.0
Occupied Rental Units by Geography	250,100	9.2	35.0	34.1	21.7	0.0
Vacant Units by Geography	83,953	7.7	31.1	38.2	22.9	0.0
Businesses by Geography	133,814	4.6	20.5	32.7	42.0	0.2
Farms by Geography	3,630	2.5	13.9	42.1	41.5	0.1
Family Distribution by Income Level	507,377	22.5	16.9	19.3	41.3	0.0
Household Distribution by Income Level	726,502	24.4	16.1	17.9	41.6	0.0
Median Family Income MSA - 41700 San Antonio-New Braunfels, TX MSA		\$58,222	Median Housing Value			\$137,275
			Median Gross Rent			\$780
			Families Below Poverty Level			12.2%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The San Antonio-New Braunfels, TX MSA comprises the following eight counties: Atascosa, Bandera, Bexar, Comal, Guadalupe, Kendall, Medina, and Wilson counties. Commonly known as Greater San Antonio, the metropolitan area straddles South Texas and Central Texas and it is on the southwestern corner of the Texas Triangle. The San Antonio-New Braunfels, TX MSA is the third-largest metropolitan area in Texas after the Dallas-Fort Worth-Arlington, TX MSA and the Houston-The Woodlands-Sugar Land, TX MSA. It is also the second fastest-growing large metropolitan area in the state after the Austin-Round Rock, TX MSA. Principal cities are San Antonio, New Braunfels, Schertz, and Seguin. The 2017 American Community Survey estimates the population at 2.4 million, a 15 percent increase in the population since the 2010 census.

Employment and Economic Factors

The San Antonio-New Braunfels, TX MSA has numerous major companies and industries. The most common job groups, by number of people living in the MSA, are management, business, science and arts, sales and office, and service. San Antonio’s employers support a healthy and diverse economy with a blend of well-established financial services, rapidly growing biomedical and biotech sectors, IT and cybersecurity field, and a robust manufacturing sector that produces everything from aircrafts to Toyota trucks. San Antonio’s central location has made it the hub for economies in the South Central Texas region and Mexico. Based on data from the Bureau of Labor Statistics, in January 2012, the unemployment rates in the San Antonio-New Braunfels, TX MSA was 6.6 percent. In December 2016, the unemployment rate decreased to 3.6 percent.

Major employers in the San Antonio-New Braunfels, TX MSA are Joint Base San Antonio (JBSA), HEB Grocery Company, LP, United Services Automobile Association (USAA), City of San Antonio, Methodist Healthcare System, Baptist Health System, JPMorgan Chase, Wells Fargo, AT&T, and Cullen/Frost Bankers. Often referred to as Military City, USA, the San Antonio-New Braunfels, TX MSA has had a strong military presence for centuries. With three major military bases as part of JBSA, the city is home to one of the largest active and retired military populations in the nation. The three military bases include Fort Sam Houston, Lackland Air Force Base, and Randolph Air Force Base. The MSA is also home to seven Fortune 1000 companies: Valero Energy Corp, Tesoro Petroleum Corp, Clear Channel Communications, USAA, NuStar Energy, and CST Brands Inc.

Housing

The National Association of Realtors reports that the median price of a single-family home at December 31, 2014, was \$182,100 for the San Antonio-New Braunfels, TX MSA. As of December 31, 2016, this value rose to \$206,900. In an MSA with rising incomes and declining unemployment, housing affordability continues to be a significant issue. In 2016, the CoreLogic Case-Shiller Home Price Index for San Antonio reported a 7.8 percent year-over-year gain in single-family home sale prices, compared to 3.7 percent gain nationally. As a result, San Antonio homes are overvalued by 18.6 percent, the most of any market in America, according to Fitch Ratings. Owner occupied rates continue to increase in higher priced properties in newer neighborhoods. In addition, renter demand remains strong in mid-tier neighborhoods. In 2016, the U.S. Census Bureau reported that San Antonio's monthly housing rents are rising at a sharper rate than the state or national average and the city's housing market is attracting a bigger share of renters than in years past. The median monthly rent for occupied housing inside San Antonio's city limits rose to \$856, according to the 2011-2015 American Community Survey 5-Year Estimates. This represents a 14 percent increase from the median rent of \$748 reported for 2006-2010.

The 2016 Housing Affordability Index (HAI)¹⁰⁴ composite score for the MSA was 174.5. The index measures affordability of housing for a single family earning the median family income to necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a slightly lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicted that the following are identified needs within this MSA:

- Affordable housing
- Community services, such as financial education and job training
- Economic development

¹⁰⁴ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Opportunities for participation by financial institutions include the following:

- Working with various nonprofits on affordable housing development and mortgage financing
- Fund job training needs for the medical field which is an industry in San Antonio that is growing rapidly, and it is experiencing a shortage of trained staff
- Working with area economic development agencies to promote initiatives that create opportunities for a diverse and strong economy

State of Virginia
Charlottesville, VA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Charlottesville, VA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	48	6.3	22.9	41.7	27.1	2.1
Population by Geography	218,705	7.1	19.2	46.2	26.3	1.2
Housing Units by Geography	94,080	5.2	21.2	46.7	26.9	0.1
Owner-Occupied Units by Geography	53,685	2.2	18.6	46.8	32.4	0.0
Occupied Rental Units by Geography	28,294	10.4	22.6	46.9	19.9	0.2
Vacant Units by Geography	12,101	6.4	28.9	46.1	18.7	0.0
Businesses by Geography	16,844	3.2	12.2	45.7	38.5	0.4
Farms by Geography	746	2.3	23.2	45.7	28.8	0.0
Family Distribution by Income Level	50,804	21.1	17.1	21.1	40.7	0.0
Household Distribution by Income Level	81,979	23.8	16.0	18.2	42.0	0.0
Median Family Income MSA - 16820 Charlottesville, VA MSA		\$70,998	Median Housing Value			\$281,679
			Families Below Poverty Level			6.7%
			Median Gross Rent			\$942

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Charlottesville, VA MSA comprises the following five counties: Albemarle, Buckingham, Fluvanna, Greene, and Nelson. The principal city is Charlottesville. The MSA is located 71 miles west of Richmond, VA; 110 miles southwest of Washington, D.C.; and, 162 miles northwest of Norfolk, VA. The University of Virginia is located in Charlottesville.

Employment and Economic Factors

According to Moody's Analytics, the Charlottesville, VA MSA is Virginia's strongest performing metropolitan area. Key economic indicators are faring far better than statewide and nationally, and prior year (2016) growth in payroll employment near 2 percent exceeds that in every other Virginia metropolitan area or division. According to the Moody's Analytics business cycle tracker, the Charlottesville, VA MSA is in late-cycle expansion because of supply constraints that have contributed to slower job growth over the last six months. The labor market is tight with a limited supply of qualified candidates. The unemployment rate is low at 3.3 percent in December 2016. Leisure/hospitality and business/professional services are responsible for about two-thirds of the job gains that occurred in 2017. Unlike in most of the state, the Charlottesville, VA MSA enjoys positive and increasing net migration, which not only allows for strong labor force growth, but also supports housing and consumer industries.

The University of Virginia (UVA) and Shenandoah National Park will have to overcome cuts in government funding that occurred in 2017. UVA managed to balance reduced state appropriations through higher private endowments and by raising tuition. UVA's excellent reputation makes it unlikely that the increased tuition will affect enrollment rates. In contrast, cuts to federal funding for Shenandoah National Park are cause for concern. The park administration significantly hiked entrance fees, but the funding cut, together with a dip in visits, suggests that positive momentum in leisure/hospitality will fade, and the industry will add jobs at a below-average rate in 2018.

A segment of the population that remains woefully underused by businesses are those residents holding a graduate degree, causing a long-term brain drain and loss of upside potential in the Charlottesville, VA MSA. The supply of high-skilled jobs is not keeping pace with the availability of UVA's post-graduate population. There is more job availability for workers with at least a high school diploma.

Top employers (defined as employees of 1,000 or more) include the UVA, UVA Medical Center, Sentara Healthcare, UVA Health Services Foundation, and State Farm Insurance.

Housing

Steady population gains among baby boomers and Generation X, which have higher rates of homeownership than younger cohorts, are lifting up a housing market that has lagged in recent years. Households in the Charlottesville, VA MSA are forming more quickly than elsewhere, and with inventories of unsold homes depressed, prices are rising, and new single-family housing starts are up 30 percent year over year, three times the national average. While housing is less affordable than average, it is also about 5 percent undervalued, leaving more room for growth in the residential market. Construction, along with education/healthcare and business/professional services, will be the top job creators in 2018.

Community Contacts

A review of community contacts indicted that the following are identified needs within this MSA:

- Expanded funding for housing counseling
- Down payment assistance
- Overall first-time homebuyer support

Opportunities for participation by financial institutions include the following:

- Down payment assistance
- Affordable housing construction.

Richmond, VA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Richmond, VA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	295	9.8	25.1	34.6	29.2	1.4
Population by Geography	1,208,101	7.5	22.3	36.8	33.4	0.1
Housing Units by Geography	497,013	8.1	23.8	36.8	31.3	0.0
Owner-Occupied Units by Geography	310,572	3.6	17.3	40.1	39.0	0.0
Occupied Rental Units by Geography	141,349	15.4	34.9	31.7	18.0	0.0
Vacant Units by Geography	45,092	16.1	34.1	30.1	19.8	0.0
Businesses by Geography	89,658	5.4	20.4	35.4	38.7	0.2
Farms by Geography	2,531	2.0	18.9	40.6	38.5	0.0
Family Distribution by Income Level	300,468	20.4	18.0	21.1	40.5	0.0
Household Distribution by Income Level	451,921	22.4	17.3	18.7	41.6	0.0
Median Family Income MSA - 40060 Richmond, VA MSA		\$71,605	Median Housing Value			\$230,465
			Median Gross Rent			\$884
			Families Below Poverty Level			7.5%

*Source: 2010 U.S. Census and 2016 D&B Data
Due to rounding, totals may not equal 100.0*

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

The Richmond, VA MSA comprises the following 13 counties and 4 independent cities: Amelia, Caroline, Charles City, Chesterfield, Dinwiddie, Goochland, Hanover, Henrico, King William, New Kent, Powhatan, Prince George, Sussex, Colonial Heights City, Hopewell City, Petersburg City, and Richmond City. The MSA is located equidistant from Northern Virginia, Hampton Roads, and Lynchburg. The area is home to approximately 1.3 million residents or 15.1 percent of the state’s current population.

Employment and Economic Factors

According to Moody’s Analytics, the Richmond, VA MSA’s economy is strong and besting the U.S. and other major population centers in Virginia, such as Northern Virginia and Virginia Beach. Professional/business services lead job creation, followed by government, healthcare, and construction. Moreover, in the Richmond, VA MSA, the statewide recent malaise in retail is less pronounced. The allure of the area’s job market is drawing participants into the labor force at an above-average pace. The job growth is a windfall for single-family housing as permits are rising faster than in the U.S.

Moody’s Analytics stress-tested Virginia’s state budget and found that a garden-variety recession would lead to revenue losses and increased Medicaid spending that amount to 11 percent of fiscal 2017 revenues. Virginia’s reserves make up less than 4 percent of fiscal 2017 revenues. Local governments have similar fiscal issues. In the core counties of Henrico, Hanover, and Chesterfield, operating funds as a share of revenues are below the median for U.S. counties.

Proliferating data centers, which have largely benefitted Northern Virginia, will spread to the Richmond, VA MSA thanks to state tax incentives for computer equipment spending, low industrial electricity rates in Virginia, proximity to the federal government, and rising cloud computing demand. Facebook is opening a data center in Henrico County's White Oak Technology Park. In addition, the Henrico Planning Commission has approved a plan of development for another data center in the technology park.

Moody's Analytics projects that the Richmond, VA MSA will best the U.S. this year and next (2018). A large talent pool along with high standards of living will propel further growth in professional/business services. An expanding population will nurture continued investments in healthcare capacity. The Richmond, VA MSA's status as a distribution hub will enable the area to reap the full upside from e-commerce. Longer term, the metropolitan area will match the U.S. rate of growth.

Top employers in the Richmond, VA MSA include Capital One Financial, Fort Lee, VCU Health System, HCA Inc., Bon Secours Richmond Health System, Wal-Mart Stores Inc., and Dominion Resources, Inc. BANA employed 1,921 in the metropolitan area.

Housing

A buoyant job market, favorable demographics, and house price gains exceeding the state average will galvanize hiring by homebuilders. HHHunt Homes is building 81 courtyard houses at Wyndham Forest, a neighborhood in western Henrico County. There are plans to demolish a one-story warehouse in downtown Richmond to make way for a 12-story apartment building, named the Locks Tower, to rise in its place. Monument Companies, a residential developer, is also converting two other spaces north of the James River into 80- and 59-unit apartment buildings. The Richmond, VA MSA's rental vacancy rate is below average, pushing rents up. Increased multi-family development is key to easing rental inflation and enabling potential homebuyers to save enough for a down payment.

The 2016 Housing Affordability Index (HAI)¹⁰⁵ composite score for the MSA was 189.3. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a lower cost of housing in comparison to the national average of 167.1.

Community Contacts

A review of community contacts indicated that the following are identified needs within this MSA:

- Affordable housing. There needs to be an additional 20,000 affordable housing units built by 2030 to meet the future demand of this sector of the population. There is a need for more affordable housing choices for lower-income individuals.
- Increase the salaries of the low-income wage earner.

State of Washington

¹⁰⁵ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Bremerton-Silverdale, WA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Bremerton-Silverdale, WA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	0.0	21.8	56.4	20.0	1.8
Population by Geography	251,133	0.0	19.5	57.9	22.7	0.0
Housing Units by Geography	105,342	0.0	21.0	58.1	20.9	0.0
Owner-Occupied Units by Geography	65,529	0.0	13.2	61.7	25.1	0.0
Occupied Rental Units by Geography	30,229	0.0	36.4	51.6	12.0	0.0
Vacant Units by Geography	9,584	0.0	26.3	53.5	20.2	0.0
Businesses by Geography	15,407	0.0	14.8	53.9	31.2	0.0
Farms by Geography	504	0.0	6.7	59.5	33.7	0.0
Family Distribution by Income Level	65,215	17.9	19.0	22.9	40.2	0.0
Household Distribution by Income Level	95,758	21.3	17.5	20.6	40.6	0.0
Median Family Income MSA - 14740 Bremerton-Silverdale, WA MSA		\$71,065	Median Housing Value			\$297,710
			Families Below Poverty Level			6.1%
			Median Gross Rent			\$926

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

The Bremerton-Silverdale, WA MSA comprises Kitsap County and includes the cities of Bremerton, Bainbridge Island, Port Orchard, and Poulson. The MSA is connected to the eastern shore of Puget Sound by Washington State Ferry routes. The U.S. Navy is the largest employer, with installations at Puget Sound Naval Shipyard (PSNS), Naval Underseas Warfare Center Keyport, and Naval Base Kitsap. The MSA is a part of the Seattle-Tacoma, WA Combined Statistical Area.

Employment and Economic Factors

According to Moody's Analytics, the Bremerton-Silverdale, WA MSA's economy is falling behind the state and the nation. Progress is slow across industries, including in the outside public sector, and prior year growth in payroll employment ranks among the worst in Washington. Employment in private services is largely unchanged since January 2017 with gains in professional/business and financial services offset by cutbacks in retail and healthcare. However, the signal from the household survey of employment is more upbeat. The labor force is expanding rapidly. The jobless rate fell to a post-recession low of 4.6 percent in October 2017. Wage and salary income growth exceeds the state and national rates by the most since 2010, and recent acceleration is lending support to the housing market.

According to Moody's Analytics, Naval Base Kitsap and the PSNS will be a pillar of strength in the MSA economy. Expanding work obligations at the shipyard will support federal hiring over the next several years. PSNS has announced it is hiring again, its sixth large recruitment effort in the past three years. The Navy's four shipyards, including PSNS, are in poor condition,

according to a report by the U.S. General Accounting Office (GAO). PSNS has only completed 29 percent of maintenance work on time since 2000 because of a backlog of work and aging infrastructure. With the number of ships set to rise from 275 to 355, the demands on the shipyards will only grow. The Navy plans to spend up to \$4 billion to upgrade its shipyards over the next 30 years. Expansion of the workforce will boost incomes because these jobs generally pay well.

Moody Analytics predicts the Bremerton-Silverdale, WA MSA will struggle to reduce its reliance on the public sector. Industrial diversity ranks in the bottom quartile among West metropolitan areas. A favorable cost structure, average educational attainment, and proximity to Seattle have the potential to attract new businesses and broaden the industrial base. Office space is inexpensive and tax burdens and labor costs are below average. However, the MSA has not attracted substantial investment to date and private industries are expanding at a below-average rate. Employment in private industries is up only 3 percent since 2010 compared with 16 percent nationally.

Moody's Analytics projects that the Bremerton-Silverdale, WA MSA will gain enough momentum to keep pace with the regional average in 2018. Stronger hiring and positive net migration will support rising incomes and consumption. However, an overreliance on federal government and a lack of dynamic drivers will keep gains below the state average in the long term.

Top employers in the Bremerton-Silverdale, WA MSA include Naval Base Kitsap, Harrison Medical Center, Naval Undersea Warfare Center, Naval Hospital Bremerton, and Olympic College.

Housing

According to Moody's Analytics, the housing market will contribute more to output and employment growth thanks to strong fundamentals. Rising incomes and an above-average rate of household formation will support housing demand in the coming year. More federal government jobs and stronger hiring in private industries will support solid gains in average household incomes. In addition, the Bremerton-Silverdale, WA MSA will benefit from Seattle's robust labor market as more workers take advantage of a lower cost of living in the Bremerton-Silverdale, WA MSA than across the Puget Sound. Stronger net migration will support above-average household formation and boost demand for housing. Home sales are strong, with sales of existing homes outpacing the state and national averages. Residential building is picking up as inventories draw down and house price appreciation slowly accelerates.

Community Contacts

A review of community contacts indicated that the following are needs within the MSA:

- Affordable workforce housing and housing for low-income families
- More affordable deposit product choices for low-income individuals, including a “second chance” checking account

Seattle-Tacoma-Bellevue, WA MSA

Table A - Demographic Information of the Assessment Area

Assessment Area: Seattle-Tacoma-Bellevue, WA MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	721	4.3	21.2	46.3	27.6	0.6
Population by Geography	3,439,809	4.0	20.8	48.0	27.0	0.2
Housing Units by Geography	1,437,149	4.3	21.2	48.0	26.5	0.0
Owner-Occupied Units by Geography	835,442	1.6	15.6	50.3	32.5	0.0
Occupied Rental Units by Geography	506,020	8.3	29.8	44.6	17.3	0.0
Vacant Units by Geography	95,687	6.5	24.2	45.7	23.5	0.0
Businesses by Geography	263,802	4.9	17.8	44.8	32.4	0.1
Farms by Geography	5,510	2.3	15.4	51.7	30.7	0.0
Family Distribution by Income Level	834,637	20.2	17.9	22.2	39.7	0.0
Household Distribution by Income Level	1,341,462	22.9	16.7	18.9	41.5	0.0
Median Family Income MSA - 42644 Seattle-Bellevue-Everett, WA MD		\$83,852	Median Housing Value			\$375,632
Median Family Income MSA - 45104 Tacoma-Lakewood, WA MD		\$68,462	Median Gross Rent			\$1,007
			Families Below Poverty Level			6.7%

*Source: 2010 U.S. Census and 2016 D&B Data
Due to rounding, totals may not equal 100.0*

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

The Seattle-Tacoma-Bellevue, WA MSA comprises King, Pierce, and Snohomish counties, which are the three most populous counties in the state. Principal cities include Seattle, Tacoma, Bellevue, Everett, Kent, Renton, Auburn, Lakewood, and Redmond. The 2017 American Community Survey estimates the population at 3.8 million, a 12 percent increase since the 2010 census. The Seattle-Tacoma-Bellevue, WA MSA is the 14th largest metropolitan area in the U.S. Almost half of the state’s population lives in the Seattle-Tacoma-Bellevue, WA MSA.

Employment and Economic Factors

According to Moody’s Analytics, the Seattle-Tacoma-Bellevue, WA MSA’s economy is in a league of its own. Although job growth has eased from the pace of the past five years, a swell of in-migration has enabled the economy to grow faster for longer. Large expansions by Amazon, Microsoft, and Google have cemented the MSA’s status as the cradle of the global cloud-computing revolution and secured its status at the forefront of large U.S. metro areas in terms of job, income, and output growth. While Boeing continues to pare workers and it has reduced its workforce in the MSA by a fifth in the past 18 months, gains in informatics, software publishing, and data analytics has more than made up for the aerospace giant’s layoffs. The continuing erosion in housing affordability and the still-restrained pace of single-family homebuilding are blemishes on an otherwise sparkling report card. Despite rising home sales, new residential construction badly lags demand.

Tech titan Amazon's push to establish a second corporate headquarters beyond its Seattle-Tacoma-Bellevue, WA MSA base is not a rebuke to the area's tech-charged economy, but it does cast light on labor, housing, and commercial real estate constraints that will place a speed limit on growth over the next few quarters. Although large labor force gains have created more room for employers to run, the pool of idle workers is rapidly thinning, and the synchronous U.S. expansion will create better-paying opportunities throughout the country, reducing the incentive to migrate to the Seattle-Tacoma-Bellevue, WA MSA. Salaries for tech workers remain well below those in the San Francisco Bay Area, but they have risen by more than a third in the past four years. Still, with large tech firms getting first pick of engineering graduates at top-ranked University of Washington, the Seattle-Tacoma-Bellevue, WA MSA will maintain its allure. Amazon will still add close to 10,000 workers at its local headquarters in the next few years, and Microsoft, Google, and F5 Networks all harbor plans for expansion in Seattle. Although rising wages and office rents will encourage smaller tech firms to look elsewhere, proximity to top talent and the agglomeration economies, Seattle, Portland, and the Bay Area will entice larger firms to remain.

According to Moody's Analytics, the two-year contraction in aerospace manufacturing jobs will soon bottom, but the industry will no longer be a source of long-run job and income gains. Despite large workforce reductions, top employer Boeing will be a source of stability and payrolls will remain roughly even as the company adapts to airlines' demand for smaller planes. The start of production at the firm's new carbon-fiber wing facility in Everett will create up to 1,000 manufacturing jobs over the next few years, but net gains will be slim as automation takes hold elsewhere on the assembly line.

Moody's Analytics predicts that the Seattle-Tacoma-Bellevue, WA MSA's ascent as a global cloud competing hub will set it apart from other large U.S. metropolitan areas in job and income growth even as labor and housing constraints become more binding. Despite a contracting manufacturing base, rapid growth in software and IT services will secure the economy's status as one of the most vibrant in the West and in the U.S.

Top employers in the Seattle-Tacoma-Bellevue, WA MSA include Boeing Company, Microsoft Corporation, University of Washington, Amazon, Providence Health, Wal-Mart, Fred Meyer Stores, Costco, Swedish Health, Starbucks, and Nordstrom.

Housing

Soaring house prices will cause housing affordability to worsen over the next two years, putting home purchases increasingly among reach for workers in non-tech industries. If house prices continue to outpace income gains, the outlook for home sales and residential construction is negative.

The 2016 Housing Affordability Index (HAI)¹⁰⁶ composite score for the MSA was 124. The index measures affordability of housing for a single family earning the median family income necessary to qualify for a mortgage loan to purchase a median priced home. The higher the score, the more affordable the home. The HAI score for the MSA reflects a higher cost of housing in comparison to the national average of 167.1.

¹⁰⁶ Copyright 2017 "Affordability Index of Existing Single-Family Homes for Metropolitan Areas" National Association of Realtors.

Community Contacts

A review of community contacts indicated that the following are identified needs within this MSA:

- Affordable workforce housing and housing for low-income families