



PUBLIC DISCLOSURE

April 18, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

M.Y. Safra Bank, FSB
Charter Number: 715731

499 Park Avenue
New York, NY 10022

Office of the Comptroller of the Currency

340 Madison Avenue
4th Floor
New York, NY 10017-2613

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 Lending Test is rated: Outstanding.

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable based on M.Y. Safra Bank, FSB's (M.Y. Safra or bank) performance context.
- M.Y. Safra originates or purchases a substantial majority of loans within its assessment area (AA).
- The Lending Test is rated outstanding due to the overall excellent distribution of loans across low- and moderate-income (LMI) census tracts (CT) within the New York-Jersey City-White Plains-NYNJ MMSA AA.
- The level of community development activities reflects excellent responsiveness to community needs within the AA with a primary focus on affordable housing.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

M.Y. Safra's quarterly average net LTD ratio throughout the evaluation period of January 1, 2018 through December 31, 2020 (evaluation period) was 61.8 percent. The ratio ranged from a low of 51.2 percent to a high of 72.1 percent. We compared M.Y. Safra's quarterly average net LTD ratio to six similarly situated institutions located in New York and Queens counties over the evaluation period. Total asset sizes of the similarly situated institutions ranged from \$262.9 million to \$687.2 million as compared to M.Y. Safra's asset size of \$344.7 million as of December 31, 2020. The quarterly average net LTD ratio for the six similarly situated institutions was 69.2, ranging from a low of 43.0 to a high of 88.2. M.Y. Safra's quarterly average net LTD ratio ranks fifth out of seven total similarly situated banks.

Lending in Assessment Area

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

M.Y. Safra originated and purchased 98.2 percent by number of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. Given the high percentage of lending by M.Y. Safra within its AA, this analysis factored heavily into the overall analysis of the distribution of lending by income level of the geography.

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 Loans										
2018	18	100	0	0.0	18	26,208	100.0	00	0.0	26,208
2019	20	95.2	1	4.8	21	35,278	94.0	2,250	6.0	37,528
2020	15	100.0	0	0.0	15	26,990	100.0	00	0.0	26,990
Total	53	98.2	1	1.8	54	88,476	97.5	2,250	2.5	90,726

Description of Institution

M.Y. Safra is an intrastate bank headquartered at 499 Park Avenue in New York, New York (NY). The bank was established in 2000 and re-branded as M.Y. Safra in 2013 after moving from Baltimore, MD to the current location. M.Y. Safra does not have any subsidiaries or affiliates.

M.Y. Safra designated the entirety of the New York-Jersey City-White Plains-NYNJ MMSA as its AA. The AA was determined by branch location and market penetration of lending and deposit accounts. M.Y. Safra operates one branch located within the AA at the same address as headquarters. M.Y. Safra also maintains a robust online presence.

M.Y. Safra is a full-service bank that offers a variety of standard personal and business loan and deposit products. M.Y. Safra's primary loan products are multifamily and 1-4 family residential loans, which represent 47.0 percent and 39.7 percent of the total loan portfolio respectively, as of December 31, 2020. M.Y. Safra reported total assets of \$344.7 million and net loan portfolio of \$214.1 million, representing 62.1 percent of total assets as of this same date. Core deposits total \$218.2 million, representing 73.5 percent of total deposits and 72.5 percent of total liabilities. Tier 1 capital at year-end 2020 was \$42.9 million and the tier 1 leverage ratio was 12.1 percent.

The previous CRA evaluation as of December 31, 2017 resulted in an overall satisfactory rating. There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs of the AA during the evaluation period.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We performed a full-scope evaluation covering the evaluation period from January 1, 2018 through December 31, 2020. We performed the Lending Test to evaluate the bank's record of meeting credit needs of the community within the AA through lending activity. The Lending Test consisted of assessing home mortgage loans originated or purchased during the evaluation period. We determined M.Y. Safra's primary lending product during the evaluation period was home mortgage loans based on the bank's overall business strategy and the volume of home mortgage loans originated or purchased.

Lending within the AA, the LTD ratio, and distribution of lending by income level of the geography were equally weighted in determining conclusions for the Lending Test.

We evaluated community development (CD) activities at M.Y. Safra's option. CD activities are not included in the evaluation of a small bank's CRA performance unless, at the bank's option, it would like its record of making qualified loans and investments and providing CD services evaluated. As such, we evaluated the bank's level of CD lending, CD donations, and CD services during the evaluation period.

Selection of Areas for Full-Scope Review

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

Ratings

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

M.Y. Safra's rating is based on performance within the state of NY because 98.1 percent of home mortgage loans by number and 97.5 percent of home mortgage loans by dollar amount were concentrated in NY.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of New York

CRA rating for the State of New York: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The distribution of home mortgage loans by income level of the geography reflects excellent performance.

Description of Institution's Operations in New York

During the evaluation period, M.Y. Safra operated one branch and one full-service ATM at the same location as its headquarters. M.Y. Safra's primary business is to provide consumer and commercial banking services to its customers. M.Y. Safra offers a traditional selection of lending products and deposit accounts including checking, savings, money market, and certificates of deposit for both personal and business purposes. M.Y. Safra provides both non-interest and interest-bearing checking accounts with interest-bearing accounts yielding higher rates for larger account balances.

M.Y. Safra's AA consists of 2,474 contiguous CTs inside the New York-Jersey City-White Plains-NYNJ MMSA. The market within the AA is highly competitive. Primary competitors include Flushing Bank, Dime Community Bank, Signature Bank, JP Morgan Chase Bank (JPMC), ConnectOne Bank, Sterling National Bank, Bank of America (BOA), Citibank, and Wells Fargo Bank. According to the FDIC Deposit Market Share Report as of June 30, 2020, M.Y. Safra reported \$334.3 million in total deposits, representing 0.02 percent of deposits within the AA. The top five institutions, consisting of JPMC, The Bank of NY Melon, Goldman Sachs Bank, HSBC Bank, and BOA accounted for 67.4 percent of the total deposit share by dollar amount of the AA as of this same date. Operating within a highly competitive market limits lending opportunities to LMI individuals and LMI geographies. According to the 2020 FDIC Originated or Purchased Loan Market Share Report, the top 10 institutions for home mortgage lending in the AA originated 46.7 percent by dollar amount of home mortgage loans within the AA. M.Y. Safra is not ranked in the top 445 home mortgage lenders inside the AA.

The New York-Jersey City-White Plains-NYNJ MMSA AA was significantly impacted by the global COVID-19 pandemic. According to the Bureau of Labor Statistics, the unemployment level of the AA as of December 31, 2020 was 11.1 percent, significantly increasing from 4.0 percent in 2018 and 3.6 percent in 2019. Unemployment reached as high as 18.2 percent in May of 2020. The top five employers in the AA according to Moody's Analytics Report are Montefiore Health System, Mount Sinai health System, JPMC, BOA, and New York Presbyterian Healthcare System. Primary professions include educational and health services, professional and business services, and government representing 21.3 percent, 16.4 percent, and 12.9 percent of total employment within the AA, respectively. According to 2020 Dun & Bradstreet data, median family income equals \$67.6 thousand, and 15.9 percent of the AA live below the poverty level. Median housing value in the AA is \$528.3 thousand and median gross rent is \$1,300.

We reviewed community contacts from 13 local non-profit organizations within the bank’s AA. The community contacts noted community needs include greater affordable housing, increased financial literacy, increased social services for those in need, and greater small business lending activity. The community contacts identified affordable housing as the greatest concern as housing and rental increases continue to outpace wage growth. The community contacts indicated opportunities exist for financial institutions to finance affordable housing and smaller commercial housing loans, offer credit and financial literacy education, open additional branches in underserved communities, and build relationships with small businesses.

New York-Jersey City-White Plains-NYNJ MMSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: New York-Jersey City-White Plains MMSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,474	12.1	24.5	27.8	32.7	2.9
Population by Geography	9,814,234	14.8	26.7	24.5	33.7	0.3
Housing Units by Geography	3,934,988	13.3	24.6	23.6	38.3	0.2
Owner-Occupied Units by Geography	1,297,598	2.9	13.7	27.4	55.9	0.2
Occupied Rental Units by Geography	2,290,699	19.7	30.9	21.8	27.3	0.3
Vacant Units by Geography	346,691	10.2	23.4	21.5	44.6	0.3
Businesses by Geography	982,006	7.7	18.8	19.6	51.6	2.3
Farms by Geography	6,483	3.4	13.0	18.2	64.5	0.9
Family Distribution by Income Level	2,203,654	30.0	15.6	15.4	39.0	0.0
Household Distribution by Income Level	3,588,297	30.5	14.2	15.1	40.2	0.0
Median Family Income New York-Jersey City-White Plains, NY NJ MMSA AA		\$67,560	Median Housing Value			528,311
			Median Gross Rent			\$1,345
			Families Below Poverty Level			15.9%
<i>Source: 2015 ACS and 2020 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>						

Scope of Evaluation in New York

The full-scope evaluation of the New York-Jersey City-White Plains-NYNJ MMSA AA included the entirety of Bronx, Queens, NY, Richmond, Westchester, Rockland, and Orange counties in NY. Home mortgage loans were the primary focus of our evaluation due to M.Y. Safra’s overall lending strategy and the volume of home mortgage loan originations and purchases during the evaluation period. We considered M.Y. Safra’s performance context while performing our analysis.

Lending Test

The bank's performance under the Lending Test in the state of New York is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the state of New York is excellent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

M.Y. Safra exhibits excellent distribution of home mortgage loans among geographies of different income levels within the AA. The percentage of home mortgage loans originated in LMI geographies significantly exceeds the percentage of owner-occupied units and the aggregate industry distribution in LMI geographies.

Distribution of Loans by Income Level of the Borrower

There was not sufficient data available to perform a meaningful analysis of the distribution of loans by income level of the borrower.

Responses to Complaints

M.Y. Safra did not receive any complaints related to CRA activities during the evaluation period.

Community Development

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the state of NY through CD-qualified loans, investments, and services, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA. Performance related to CD activities had a positive effect on the bank's rating in the state.

Number and Amount of Community Development Loans

Refer to the "Community Development Loans" table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
New York-Jersey City-White Plains-NYNJ MMSA AA	17	100%	\$19,420	100%

The table as shown above, sets forth the information and data used to evaluate the bank's level of CD lending.

M.Y. Safra identified affordable housing as a primary need in the community within its AA. M.Y. Safra originated 17 loans that qualify for CD lending totaling \$19.4 million, or 45.3 percent of tier 1 capital. CD loans financed 94 affordable housing units inside the AA. CD lending activity positively impacted the overall CRA rating due to the high level of CD lending inside the AA and excellent responsiveness to community needs, specifically focusing on affordable housing.

Number and Amount of Qualified Donations

M.Y. Safra made two qualified donations totaling \$20,000 during the evaluation period to an organization focused on providing services to LMI youth through the creative arts. CD donations represent 0.05 percent of capital. The organization services thousands of young people inside the AA annually by providing after school programs, youth employment opportunities, and art education programs. Students are not charged for participation in the program. CD donations had a neutral impact on the overall CRA rating.

Extent to Which the Bank Provides Community Development Services

M.Y. Safra's Chief Executive Officer/President provided 114 community service hours as a member of the board to an organization focused on the development of affordable rental and home ownership opportunities for LMI individuals and families within the bank's AA. M.Y. Safra also expanded services during 2020 in response to the pandemic. M.Y. Safra extended customer service hours of operations by 60 minutes, began accepting electronic signatures, and accepted e-mail requests for transactions with a "call back" verification. CD services positively impacted the overall CRA rating due to the responsiveness to community needs, specifically affordable housing and expanded services to include LMI households due to the pandemic.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/18 to 12/31/20	
Bank Products Reviewed:	Home mortgage loans CD loans, qualified investments, CD services ¹	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
New York		
New York-Jersey City-White Plains- NYNJ MMSA AA	Full scope	All CTs in New York County, Queens County, Kings County, Bronx County, Richmond County, Westchester County, Rockland County, Orange County

At the bank's option, we assessed and considered CD activities during the evaluation period in assessing overall performance.

Appendix B: Summary of MMSA and State Ratings

RATINGS – M. Y. SAFRA	
Overall Bank:	Lending Test Rating
M.Y. Safra	Outstanding
State:	
New York	Outstanding

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																2018-2020		
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.
New York-Jersey City-White Plains-NYNJ MMSA AA	53	88,476	100	2.9	28.3	3.6	13.7	30.2	12.9	27.4	11.3	23.3	55.9	30.2	60.0	0.2	0.0	0.1
Total	53	88,476	100	2.9	28.3	3.6	13.7	30.2	12.9	27.4	11.3	23.3	55.9	30.2	60.0	0.2	0.0	0.1

Source: 2015 ACS Census; 01/01/2018 – 12/31/2020 Bank Data 2020 HMDA, "--" data not available. Due to rounding, totals may not equal 100.0