



Comptroller of the Currency
Administrator of National Banks

Large Bank

PUBLIC DISCLOSURE

October 4, 1999

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Riggs Bank, N.A.
Charter Number 5046**

**6805 Old Dominion Drive
McLean, Virginia 22101**

**Office of the Comptroller of the Currency
Northeastern District
Mid-Size and Credit Card Banks
New Jersey Field Office
830 Morris Turnpike, 2nd Floor
Short Hills, New Jersey 07078**

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

General Information	3
Definitions and Common Abbreviations	4
Overall CRA Rating	6
Description of Institution	7
Scope of Evaluation	8
Fair Lending Review	10
Multistate Metropolitan Area Ratings	
Washington, DC Multistate MSA	11
Appendix A: Scope of Evaluation	A-1
Appendix B: Summary of Multistate Metropolitan Area and State Ratings	B-1
Appendix C: Market Profiles for Areas Receiving Full-Scope Reviews	C-1
Appendix D: Tables of Performance Data	D-1

General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of **Riggs Bank, N.A.** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **October 4, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

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

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

Community Development (CD) - Affordable housing for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

Geography - A census tract or a block numbering area 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 do business or have bank branches 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, and the disposition of the application (e.g., approved, denied, withdrawn).

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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, branch distribution, branch openings and closings).

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by HUD 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 incomes above it and half below it.

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

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

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

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

Institution’s CRA Rating: This institution is rated “Satisfactory”

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

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

* Note: The lending test is weighted more heavily than the Investment and Service tests when arriving at an overall rating.

Primary factors supporting the bank's overall rating include:

*The assessment area of Riggs is located entirely within the Washington DC Multistate MSA. The bank does not have any domestic branches outside of this MSA. Therefore, the bank's overall performance will be the same as performance within the MSA. Please refer to the **Multistate Metropolitan Area Rating** section of this Evaluation for a listing of primary factors supporting the overall rating of both the bank and the MSA. Also, we will not generate separate State ratings for the institution as the entire assessment area is within one Multistate MSA.*

Description of the Institution

Riggs Bank, National Association ("Riggs"), headquartered in McLean, Virginia, is a wholly owned subsidiary of Riggs National Corporation of Washington, DC. At June 30, 1999, total bank assets were \$5.0 billion and the total corporation assets were \$5.5 billion.

Riggs is an interstate bank that operates a total of 53 branches within the District of Columbia and the surrounding suburbs of Maryland and Virginia. Additionally, Riggs operates a total of 125 ATMs, including at least one ATM at each branch location.

The bank has 2 branches in London and a division, Riggs & Company, which provides trust, private banking, investment advisory, and broker-dealer services. Subsidiaries of the bank include Riggs Real Estate Investment Corporation ("RREIC"), which purchases mortgage loans. Riggs also operates an Edge Act subsidiary in Miami, Florida, a commercial bank in London, England, and a bank and trust company in the Bahamas. The operations of all subsidiaries do not impact the bank's capacity for community reinvestment.

Riggs offers a full array of consumer loan products and is active in housing finance, providing home purchase mortgage and home equity loans. Net loans of \$3.1 billion represent 62% of total assets and 76% of total deposits. The following table portrays the loan mix of the bank:

Types of Loans Outstanding - June 30, 1999		
Type	Amount \$(000s)	%
Residential Real Estate, including Home Equity	1,540,979	49
Commercial Real Estate	408,183	13
Commercial	764,639	24
Consumer	69,129	2
Loans in Foreign Offices	403,116	13
Allowance for Loan and Lease Losses	(52,174)	(1)
Net Loans	3,133,872	100%

Source: June 30, 1999 Call Report

Riggs business strategy is to maintain traditional retail banking products and services, while also increasing income derived from asset management. This strategy was evident in 1998 as trust and investment advisory income grew 23% over 1997 and total non-interest income grew 30% over the same period.

Riggs was rated "satisfactory" at the prior CRA evaluation as of August 31, 1997. There are no financial or legal factors that would impede the bank's ability to help meet the credit needs in its assessment area.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This review covers the period January 1, 1997 through August 31, 1999 for the lending test. The review period for community development loans and investments is September 1, 1997 through August 31, 1999. The bank does not originate farm loans. At the request of bank management we considered consumer loans and the activities of the Riggs Real Estate Investment Corporation (RREIC) in this review.

The market share and peer comparisons contained in the Lending Test are based on information derived from the aggregate Home Mortgage Disclosure Act (HMDA) Loan Report and the Small Business Report for 1998. The 1999 information is based on the bank's HMDA Loan Application Register (LAR) and Small Business Register. The aggregate HMDA Disclosure and Small Business Reports are available for public review.

The peer comparisons in this report include only lenders who were required to file HMDA and Small Business Reports for 1997 and 1998. Small business reporting is required of bank and thrift institutions with assets of \$250 million or more as of December 31 of the prior two calendar years preceding the reporting year, or an affiliate of a holding company with \$1 billion or more in assets during the same time periods.

Tables referred to throughout this report are found in Appendix D of this public disclosure.

Data Integrity

Prior to the commencement of this CRA Performance Evaluation we verified the accuracy of the data used in this review. Our findings are:

- The accuracy of a sample of applications on the 1999 HMDA LAR was verified. No critical field errors were noted.
- All Community Development loans submitted by the bank were verified for eligibility. The preponderance of the loans reviewed met the criteria set forth in the regulation. Those that did not qualify were excluded from consideration when assigning ratings.
- In our opinion, all publicly reported data is accurate.

Based on the above, we believe that this Performance Evaluation and the ratings assigned is based upon accurate data.

Selection of Areas for Full-Scope Review

The assessment area of Riggs is located entirely within the Washington DC Multistate MSA. The bank does not have any domestic branches outside of this MSA. Therefore, we conducted a full scope review of bank performance in the Washington DC Multistate MSA.

Ratings

The assessment area of Riggs is located entirely within the Washington DC Multistate MSA. The bank does not have any domestic branches outside of this MSA. Therefore, the bank's overall performance will be the same as performance within the MSA.

Fair Lending Review

A fair lending examination was conducted simultaneously with the CRA examination. The fair lending examination used standard examination procedures and was a regularly scheduled review. The examination included a review of the bank's lending policies, procedures, internal controls and audit procedures. Fair lending training programs for employees was also evaluated. The examination included a sample of 291 mortgage, refinanced mortgage, and Potomac Power Company sponsored home improvement loans. Included in the sample were approved loans to 75 African Americans, 25 loans to Hispanics, and 21 loans to Asians and a control group of 170 non-minority borrowers. The sample was designed to test that rates and terms of loans were consistent to all borrowers for a given product and application period.

We concluded that the bank was in compliance with the requirements of the fair lending regulations. Lending policies and procedures are not discriminatory and do not have a disparate impact or effect on protected classes of borrowers. Internal controls and audit procedures are effective in ensuring compliance with fair lending regulations and fair lending training programs are effective.

Multistate Metropolitan Area Rating

CRA Rating for the Washington DC Multistate MSA, which includes the District of Columbia, and parts of the States of Maryland and Virginia¹: 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 include:

- a good responsiveness to credit needs within the assessment area;
- a high percentage of home mortgage (83%), small business (92%) and consumer loans (93%) made within the assessment area;
- a good geographic distribution of all loans within the assessment area;
- a good distribution of loans among borrowers of different income levels;
- an excellent distribution to businesses of different sizes;
- a good level of community development lending activity;
- a good use of flexible lending practices in order to serve assessment area credit needs;
- a good level of investments throughout its assessment area;
- service delivery systems are accessible to geographies and individuals of different incomes levels in the assessment area; and,
- a good level of community development services provided.

Description of Institution's Operations in the Washington DC Multistate MSA

Refer to the Market Profile for the Washington DC Multistate MSA in Appendix C for detailed demographics and other performance context information. Also, refer to the earlier discussion of bank operations in the MSA under "Description of Institution".

LENDING TEST

Lending Activity

Refer to Table 1 in Appendix D for the facts and data used to evaluate the bank's lending activity.

Considering its size and the types of competitors in this market, Riggs' lending levels reflect a good responsiveness to the assessment area's credit needs. We gave equal consideration to the lending volume of all three loan types evaluated because (1) affordable housing mortgages and small business loans were both identified as credit needs in the assessment area and (2) consumer lending is a significant line of business for Riggs. Bank performance for each loan type is discussed below.

Home Mortgage Loans

During the evaluation period, Riggs originated a significant amount of home mortgage loans in the assessment area. Included in the 4,016 mortgage loans shown on Table 1, are 493 mortgages that were purchased in 1999 by Riggs Real Estate Investment Corporation, a bank subsidiary. Home improvement loans comprise the majority of Riggs' total mortgage originations. They are ranked fourth of all area lenders in this product with a market share of 6.50%. 1998 market share data for all mortgage products indicates Riggs is ranked 58 out of 743 mortgage lenders with a market share of 0.46%. Riggs is one of only a few banks headquartered in the assessment area that are ranked in the top 60. The major competitors in this market are large mortgage companies who operate nationally and purchase large volumes of loans. The top ten lenders comprise 30% of the total market share. Riggs is the leading deposit taking bank in the District of Columbia with a 26% market share.

Small Loans to Businesses

Riggs has originated a moderate volume of small business loans. Originations have decreased each year during the evaluation period due to a business decision to only pursue new small business customers in LMI areas. Large credit card companies and large, nationally operated banks dominate the local small business market and management has

decided that they can not effectively compete against these companies. 1998 market share data shows that they are ranked 21 out of 231 lenders with a market share of 0.95%. The top ten small business lenders comprise 73% of the total market share.

Consumer Loans

Riggs originates a large volume of consumer loans. Loan types included in this category are: motor vehicle, home equity, other secured, and other unsecured loans. The dollar volume of consumer loan originations comprises 84% of Riggs' Tier I capital. There is no market share data available for this category, however comparing the volume to the bank's Tier I capital provides perspective on the significant size of this lending activity.

Distribution of Loans by Income Level of the Geography

Riggs' overall geographic distribution of lending reflects a good penetration throughout the assessment area. The distribution of each product is described below.

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases. There are no conspicuous gaps in Riggs' mortgage lending patterns. The majority of geographies with no mortgage loans are tracts with no income classification and no housing units.

The geographic distribution of home purchase loan originations is excellent. The lending in low and moderate income geographies both exceed the percentage of owner occupied housing in those areas. In addition, their market shares in low and moderate-income geographies exceed their overall home purchase loan market share.

Similarly, Riggs' geographic distribution of home improvement lending is also excellent. The volume of loans in low and moderate-income geographies exceeds the amount of owner occupied housing. The market shares in low and moderate-income geographies are close to their overall home improvement loan market share.

The distribution of home refinance lending is good. The volume of loans in low-income geographies is very close to the amount of owner occupied housing in those areas. Riggs' record of lending in moderate-income geographies exceeds the percentage of owner occupied housing in those tracts. The market shares in both low and moderate-income geographies are similar to Riggs' overall home mortgage refinance market share.

Small Loans to Businesses

Refer to Table 5 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses. Our lending gap analysis revealed several low and moderate-income geographies with no small business lending activity, but the businesses in these tracts comprise only a small portion of the total 158,918 businesses in the assessment area. Another reason for the number of tracts with no activity is the bank management's decision to shift away from non-LMI small business lending.

Riggs' geographic distribution of small business lending is good. The percentage of loans in low-income tracts significantly exceeds the amount of businesses in those areas. In addition, their market share in these geographies exceeds their overall small business lending market share. The volume of lending in moderate-income tracts is close to, but does not exceed, the percentage of businesses in those tracts. Their market share in moderate-income tracts is close to their overall market share.

Consumer Loans

Refer to Table 14 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases. There are no conspicuous gaps in the bank's consumer lending patterns. The majority of the geographies with no consumer loans are tracts with no income classification and no population.

The geographic distribution is good. The volume of loans in both low and moderate-income geographies is very close to, but do not exceed, the percentages of the population living in those tracts.

Lending Gap Analysis

We reviewed the geographic distribution of loans and did not detect any conspicuous or unexplained gaps in lending patterns. Lending of all HMDA and small business products is assessment area wide.

Inside/Outside Ratio

Riggs' record of lending in their assessment area was also factored into our geographic distribution analysis. Our review indicates that a substantial majority of home mortgage,

small business, and consumer lending is in the assessment area. The volume of loans made in the assessment area during the evaluation period is as follows: home mortgage loans - 83%, small business loans - 92%, and consumer loans - 93%.

Distribution of Loans by Income Level of the Borrower

Riggs' overall distribution of borrowers reflects a good penetration among retail customers of different income levels and an excellent penetration to business customers of different sizes. The distribution of each product is described below.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of Riggs' home purchase lending is excellent. Lending levels to both low and moderate-income borrowers substantially exceed the percentages of low and moderate-income families in the assessment area. In addition, the market shares of low and moderate-income borrowers exceed Riggs' overall market share for home purchase loans.

The distribution of home improvement lending is good. The volume of loans to moderate-income families in the assessment area is excellent, exceeding the percentage of moderate income families in the area. Lending to low income borrowers is adequate and is below the percentage of low income families in the assessment area. Market share data for this category does not provide an accurate comparison because over 90% of Riggs' home improvement loans do not have income information available. Most of these loans are part of a special program with the local utility company (PEPCO). This company guarantees loans that are used to purchase energy efficient heating and air conditioning systems. These loans are offered to all PEPCO customers. The credit decision is made by PEPCO and is based on the customer's record of paying their electric bill. No income information is obtained for these loans.

Riggs' borrower distribution of home refinance lending is also good. Lending to moderate-income families in the assessment area is excellent, exceeding the percentage of moderate-income families in the area. Lending to low income borrowers is adequate and is below the percentage of low income families in the assessment area. Lending to low income borrowers is below the percentage of low-income families in the area, however, the amount of loans to moderate income borrowers significantly exceeds the percentage of moderate-income families. Riggs' market shares for both low and moderate-income borrowers are the same as their overall market share for home refinance lending.

Small Loans to Businesses

Refer to Table 10 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses. We analyzed the distribution of small business loan originations by calculating the percentage of loans made to small businesses. A small business is defined as a business with revenues of \$1 million or less. The bank's record was compared to the percentage of small businesses in the assessment area and to the percentage of small business loans made by all lenders in the assessment area. We also evaluated the distribution of loans by original amount regardless of business size.

The distribution of small business loans is excellent. Riggs' percentage of loans to small businesses far exceeds the volume of loans made to small businesses by all lenders in the area. It is also higher than the amount of small businesses located in the area. The distribution by size of loan shows that a significant majority of the loan originations are for \$100,000 or less with an average size of \$73 thousand. This is another indication that business lending is primarily to small businesses. The market share of lending to small businesses significantly exceeds Riggs' overall small business loan market share.

Consumer Loans

Refer to Table 14 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases. The distribution of Riggs' consumer loans is good. The percentage of loans to low income borrowers is slightly above the percentage of low-income households. Also, the volume of loans to moderate income borrowers approximates to the percentage of moderate-income households in the area.

Community Development Lending

Refer to Table 1 in Appendix D for the facts and data used to evaluate the bank's level of community development lending.

Riggs originated a good level of community development loans during the evaluation period. The bank originated 11 community development loans and lines of credit totaling \$22.9 million, in their assessment area.

Community development loans are defined as loans that (1) have a primary purpose of community development, as defined at 12 CFR 25.12(h), (2) have not been reported or collected by the bank or an affiliate for consideration as home mortgage, small business, small farm or consumer loans, unless they are multifamily dwelling loans, and (3) benefit the bank's assessment area or a broader statewide or regional area that includes the bank's assessment area.

Examples of the community development loans originated during the evaluation period include:

- In 1998 the bank, in partnership with FNMA and a local university, granted and funded a \$2 million revolving construction loan. This financed the construction of 15 new townhouses and the renovation of 27 townhouses in a moderate-income census tract. The townhouses are being sold at affordable prices to LMI employees of the university.
- In 1998 the bank made a \$4 million loan to finance improvements to a 167 thousand square foot shopping center in a moderate-income census tract in Maryland. These improvements resulted in the permanent creation of jobs for low- and moderate-income individuals. It also greatly increased traffic, helping to stabilize and revitalize this area.
- Throughout the evaluation period, the bank made commitments and advances totaling \$9.8 million to a free clinic located in a moderate-income census tract in Washington, D.C. The clinic is the primary provider of HIV/AIDS services in Washington. It also runs substance abuse counseling and provides direct financial assistance to certain patients. The majority of patients are low or moderate income.

Also, the bank funded 7 small business loans that had community development purposes. These loans, which are categorized as small business loans for this evaluation, fostered economic development in the assessment area.

Product Innovation and Flexibility

As noted in Appendix C, a primary credit need in the area is affordable housing construction and residential loans. Also, contacts made with economic development corporations noted that there is a need for small business micro-loans.

Riggs uses several flexible loan programs to serve the mortgage credit needs of the assessment area. The descriptions of their affordable mortgage programs are provided below. All of these products are available only to low or moderate-income borrowers.

Riggs 97% Fixed: The down payment required for this loan is 3% and the interest rate is 1/2% below the market rate. The appraisal and credit report fees are reimbursed at closing. Riggs has originated 92 loans totaling \$11.3 million during the evaluation period. This program is offered in conjunction with GE Mortgage.

Riggs 95% Fixed: This product requires a 5% down payment and the interest rate is 1/2% below the market rate. The appraisal and credit report fees are reimbursed at

closing. Riggs originated 191 loans totaling \$21.5 million during the evaluation period. This program is offered in conjunction with FNMA.

Community Home Buyer (CHB) 95% Fixed: This product is offered in conjunction with Fannie Mae. A 5% down payment is needed and the interest rate is 1/2% below the market rate. This program also reimburses appraisal and credit report fees at closing. Riggs originated 6 loans totaling \$672 thousand during the evaluation period.

CHB 95% 3/2 Fixed: This program is also in conjunction with Fannie Mae. A 5% down payment is required. Two percent of the down payment may be from a grant or other assistance. This product also offers an interest rate 1/2% below market rate and the appraisal and credit report fees are reimbursed at closing. Riggs originated 4 loans totaling \$500 thousand during the evaluation period.

Neighborhood Assistance Corporation of America (NACA) 97.5% Fixed: Only a 2.5% down payment is needed and the interest rate is 1/2% below the market rate. The majority of closing costs are reimbursed. Riggs originated 53 loans totaling \$6.8 million during the evaluation period.

Association of Community Organizations for Reform Now (ACORN) 95% Fixed: A 5% down payment is required and the interest rate is 1/2% below the market rate. The appraisal and credit report fees are reimbursed at closing. Riggs originated 43 loans totaling \$3.4 million during the evaluation period.

FHA Fixed: This program offers an interest rate that is 1/2% below the market rate. The appraisal and credit report fees are reimbursed at closing. Riggs originated 379 loans totaling \$42.1 million during the evaluation period.

VA Fixed: This program also offers an interest rate 1/2% below market rate with the appraisal and credit report fees reimbursed at closing. Riggs originated 68 loans totaling \$7.9 million during the evaluation period.

Riggs has established an innovative partnership with Fannie Mae to create an affordable housing construction loan fund of \$40 million. This fund is the first of its kind. Currently, they have originated two construction loans totaling \$3.3 million to build 37 single-family affordable housing units. These loans are also included in our calculation of Community Development Lending levels. They have also made one construction loan for \$2 million to build single family homes for low or moderate-income employees of Howard University. This project is also described under Community Development Lending.

Riggs has also initiated several small business micro-loan programs with local community development corporations (CDC) to meet that local credit needs. All of these programs

are in low- or moderate- income areas. For example, in 1997, they extended a \$750 thousand loan to a CDC to be used in Prince Georges and Montgomery Counties in Maryland as part of the SBA Micro-loan Demonstration Program. The funds were used to originate 100% SBA guaranteed small business loans in these counties. The loan amounts range from \$500 to \$25 thousand. There are 84 low and moderate-income geographies in these counties which could benefit from this program.

INVESTMENT TEST

Refer to Table 12 in Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The level of qualified investments is good. The bank has originated a significant level of qualified investments that respond to the credit needs of the assessment area. Qualified investments originated during the period under review totaled \$52 million. These investments are not considered innovative or complex. In addition, \$5.8 million in qualified investments originated in prior periods are carried forward to this evaluation period.

Funding to finance affordable housing for LMI individuals is a primary credit need in the assessment area. Assessment area investments are available, but limited by intense competition among local financial institutions. The bank has invested \$51 million in FNMA and GNMA pools of mortgage-backed securities. The securities are collateralized by mortgages on single residences and multi-family dwellings to LMI families in the assessment area. These investments play a vital role in increasing the level of funds available for affordable mortgages in the assessment area. The bank also has made donations to numerous community-based organizations and social service agencies to address funding needs for affordable housing, economic development, and community services. The chart below describes the breakdown of qualified investments originated during the period under review.

QUALIFIED INVESTMENTS				
	1998		1999	
	#	\$ (000's)	#	\$ (000's)
Affordable Housing Investments	9	25,756	15	25,742
Donations for Economic Development	3	26	5	15
Donations for Affordable Housing	7	33	7	22
Donations for Community Services	15	84	21	596

Totals	34	25,899	48	26,375
---------------	-----------	---------------	-----------	---------------

A secondary credit need in the assessment area is equity funding for small businesses. Management states that viable opportunities to invest in entities involved in small business lending are limited. The bank has decided to address small business credit needs primarily through direct small business lending. Many of the agencies that come under the umbrella of community development are involved in activities such as small business development. As noted in the chart, the bank makes a large number of donations for community services. Riggs' donations included a \$500,000 contribution to the District of Columbia College Access Program. The purpose of the program is to improve the graduation rate of high school students in Washington, D.C. and increase the level of students who pursue post-secondary education. A substantial majority of the students in this program are from low- and moderate-income areas.

SERVICE TEST

Retail Banking Services

Refer to Table 13 in Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Accessibility of Delivery Systems

Riggs service delivery systems are good. The bank has a network of 53 branches and 125 ATMs (including 55 ATMs at non-branch locations). The distribution of these branches and ATMs are detailed in Table 13 in the appendix of this evaluation. Several of the low-income area branches are actually located in business district and primarily serve the needs of the business community. Of the 55 non-branch ATMs, 10 are deposit taking. Additionally, 5 of the non-branch ATMs are located in low-income geographies and 13 are located in moderate-income geographies. Of the 10 deposit taking ATMs, one is located in a low-income census tract and one is located in a moderate-income census tract. Office hours are reasonable, with Saturday hours at 21 branches. Five of these branches are in moderate-income geographies. The bank offers a common set of financial services to all of its customers.

The bank has designated 16 of its branches as "CRA calling officer branches" that serve LMI customers. Recognizing that some LMI branches and ATMs are located in LMI-designated business districts with comparatively high rent office buildings, these branches are staffed with officers whose specific task is small business loan development in LMI communities. Some of these branches are located in middle- or upper-income geographies, but calling officers service the surrounding LMI areas.

Riggs has expanded its alternative delivery system to include screen phones. These permit customer access to the Riggs web site without owning a computer. The program started in late 1998 and made 500 units available to LMI individuals at no cost and free of monthly service charges. To date, 189 units have been distributed. Riggs is working with several community-based organizations to assist in reaching out to prospective screen phone users. This program is considered innovative. The normal cost of the unit to customers is \$100, the monthly bill pay service charge is \$8, and the checking account maintenance charge is \$10.

As of March 31, 1999 there were 7,045 home banking customers (PC, Internet, and screen phones). The following table provides the distribution of customers by census tract income level compared to the overall population of the assessment area.

Home Banking Customers and Population by Census Tract			
Census Tract	Home Banking Customers	% Customers	% Assessment Area Population
Low	252	4	5
Moderate	1,256	18	22
Middle	2,445	35	43
Upper	3,076	43	30
N/A	16	---	---
Total	7,045	100	100

Source: Bank data as of March 31, 1999

Change in Branch Locations

Riggs' record of closing branch offices has generally not adversely affected the accessibility of its services to LMI individuals or geographies. During the evaluation period, the bank closed two branches and opened none. Both branches were in upper-income geographies, one in Maryland (Shady Grove) and one in Virginia (Crystal City). The close proximity of other Riggs branches minimized the impact to LMI geographies and individuals.

Community Development Services

Riggs provides a high level of community development services. A significant number of bank employees participate in various programs serving the community. Primary services include providing financial expertise to a variety of community service and development organizations through board membership, credit counseling and loans fairs, and providing technical financial assistance for consumers and small businesses.

The following are examples of some of the community development services that Riggs has provided during the evaluation period:

- "Child Care Works, Reinvesting in Child Care" is a major Washington, DC metropolitan partnership that combines public and private resources to provide technical assistance and loans for child care facility expansion, revitalization, and rehabilitation targeting LMI individuals and geographies. As lead bank for the Metropolitan Washington Bankers Group, Riggs spent a considerable amount of time and effort working with various government agencies and community development corporations to help secure funding for the program.
- A Riggs executive is co-chair of the Housing Financing Committee for Washington, DC. The objective of this committee is to find ways to increase home

ownership, targeting LMI individuals.

- Riggs assisted the DC Department of Housing and Community Development by co-writing the application for empowerment zone status with Prince George's County. This was a complex and time-consuming project.
- Riggs employees participated in a City Wide Tax Assistance Program. Participants in the program helped prepare income tax returns for LMI individuals. The average gross income of the persons receiving assistance was approximately \$14,000.
- Senior officers from Riggs serve on the Boards of Directors or as key members of a number of non-profit community development organizations. Each of the organizations listed below serves low- and moderate-income areas and individuals. Also, each either provides affordable housing or facilitates permanent job creation in LMI areas. This effort is responsive to community needs and utilizes the financial expertise of the bank's staff. Some of the organizations for which Riggs' staff serve include, but are not limited to:
 - the United Planning Organization, a property agency providing day care and social services targeted to LMI individuals;
 - H Street Community Development Corporation, the largest CDC in the District;
 - Woman's Community Development Corporation;
 - DC Economic Development Corporation;
 - Latino Economic Development Corporation; and
 - DC Habitat for Humanity
- Riggs participated in or sponsored 26 home buying seminars for affordable mortgages. Many of these were in conjunction with ACORN, Housing Counseling Services, and Fannie Mae. Additionally, presentations were made to local realtors to introduce them to Riggs 97% and FHLB's mortgage programs targeting LMI individuals.

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 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			
HMDA and small business reportable loan data	January 1, 1997 to August 31, 1999		
Community development loans; and, investments	September 1, 1997 to August 31, 1999		
Financial Institution		Products Reviewed	
Riggs Bank, N.A. McLean, VA		Mortgage Loans, small business loans, community development loans, investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed	
Riggs Real Estate Investment Corporation (RREIC)	Banking Subsidiary	Mortgage Loans	
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Examination	Branches Visited	Other Information
Washington MSA	Full Scope	Corcoran, Lincoln, and College Park	

Appendix C: Market Profiles for Full-Scope Areas

Table of Contents

Market Profiles for Areas Receiving Full-Scope Reviews Washington DC MSA	C-2
--	-----

Washington DC Multistate MSA

Demographic Information for Full-Scope Area: Washington DC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	882	6.69	20.75	38.32	26.64	7.60
Population by Geography	3,473,475	5.02	22.19	42.72	30.00	0.07
Owner-Occupied Housing by Geography	768,862	1.42	13.69	46.54	38.36	0.00
Businesses by Geography	158,918	4.37	17.98	42.04	33.75	1.85
Farms by Geography	2,135	0.98	10.82	46.98	41.12	0.09
Family Distribution by Income Level	859,710	16.92	17.73	24.26	41.09	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	297,873	10.55	35.47	40.89	13.09	0.00
Median Family Income	\$52,807	Median Housing Value		\$189,466		
HUD Adjusted Median Family Income for 1999	\$78,900	Unemployment Rate (August 1999)		2.6%		
Households Below the Poverty Level	6.18%					

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 U.S. Census and 1999 HUD updated MFI.

Riggs has defined one assessment area entirely within the Washington Primary Metropolitan Statistical Area ("PMSA") 8840, which is a Multistate MSA and part of the larger Washington-Baltimore Consolidated Metropolitan Statistical Area ("CMSA"). Management has chosen to include the entire District of Columbia and portions of Maryland and Virginia. A list political subdivisions is shown below. The entire PMSA would encompass an area too large for the bank to reasonably serve. The assessment area meets regulatory guidelines and does not arbitrarily exclude any low- or moderate-income ("LMI") areas.

The bank's assessment area is a highly competitive environment, served by a large number of bank and non-bank financial services providers. Although Riggs ranks first in the District in deposit market share, the bank ranks fifth with approximately 8% in the entire assessment area. Riggs' four larger competitors have a total of 59% of the market based on June 30, 1998 FDIC deposit data. These competitors are part of very strong super-regional bank holding companies and have a significantly larger branch network.

The local economy remains strong. Of the top 25 metropolitan areas in the country, the Washington metro area has the lowest rate of unemployment, the lowest share of households receiving public assistance, and the highest median income. The federal government, colleges, hospitals, service firms, and retail operations provide major employment.

A not-for profit housing developer targeting LMI families in the District was contacted during the evaluation. Construction and residential mortgages for affordable housing were identified as community credit needs. A review of three additional community contacts with economic development corporations identified micro loans to small businesses as a credit need.

As stated above, Riggs has defined one assessment area entirely within the boundaries of the Washington Primary Metropolitan Statistical Area (PMSA). The assessment area includes all of the following political subdivisions:

<i>Location</i>	<i>Number of Census Tracts</i>
Washington, DC	192
Maryland	
Prince George’s County	172
Montgomery County	160
Virginia	
Arlington County	42
Fairfax County	191
Prince William County	50
Alexandria City	38
Fairfax City	12
Falls Church City	8
Manassas City	15
Manassas Park City	2
Total	882

Appendix D: Tables of Performance Data

Table of Contents

Content of Standardized Tables XX

Tables of Performance Data
Multistate Metropolitan Area(s) XX

Content of Standardized Tables

A separate set of tables is provided for each state. All Multistate metropolitan areas 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: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area.

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 MSA/assessment area.

Table 2. Geographic Distribution of Home Purchase Loans 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 market rank and market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans See Table 2.

Table 4. Geographic Distribution of Refinance Loans See Table 2.

Table 5. Geographic Distribution of Small Loans to Businesses The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 6. Geographic Distribution of Small Loans to Farms 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. The table also presents market rank and market share information based on the most recent aggregate

market data available.

Table 7. Borrower Distribution of Home Purchase Loans 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 MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 8. Borrower Distribution of Home Improvement Loans See Table 7.

Table 9. Borrower Distribution of Refinance Loans See Table 7.

Table 10. Borrower Distribution of Small Loans to Businesses Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 11. Borrower Distribution of Small Loans to Farms Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 12. Qualified Investments Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods 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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 14. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) 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 the population within each geography. For borrower distribution, the table 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 of households by income level in each MSA/assessment area.

MSA /Assessment Area	% of Total bank Deposits in Rated Area	Home Mortgage		Small Business		Community Development		Total Reported Loans		% of Total reported Bank Loans in Rated Area
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Scope:										
MSA 8840	100%	4,016	310,740	765	59,902	11	22,880	4,792	393,522	100%

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE State: DC, MD, VA Evaluation Period: January 1, 1997 to August 31, 1999

MSA /Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*			Total Home Purchase Loans	% of Total	
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod			Upper
Full Scope:															
MSA 8840	1.4	2.9	13.7	21.9	46.5	49.0	38.4	26.2	69	0.30	1.03	0.49	0.25	1,428	100%

(*) Based on 1998 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT State: DC, MD, VA Evaluation Period: January 1, 1997 to August 31, 1999

MSA /Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Home Improvement Loans			
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid		Upper	#	% of Total
MSA 8840	1.4	2.2	13.7	14.3	46.5	50.3	38.4	33.2	4	6.50	5.59	4.57	6.71	7.44	2,032	100%	
Full Scope:																	

(*) Based on 1998 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE State: DC, MD, VA Evaluation Period: January 1, 1997 to August 31, 1999

MSA /Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Home Mortgage Refinance Loans			
	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans	% Owner Occ Units	% Bank Loans		Overall	Low	Mod	Mid		Upper	#	% of Total
MSA 8840	1.4	1.3	13.7	16.4	46.5	34.5	38.4	47.8	123	0.14	0.13	0.11	0.11	0.19	556	100%	
Full Scope:																	

(*) Based on 1998 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Business Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE State: DC, MD, VA Evaluation Period: January 1, 1997 to August 31, 1999

MSA /Assessment Area	Low Income Borrowers		Moderate Income Borrowers		Middle Income Borrowers		Upper Income Borrowers		Overall Market Rank**	Market Share by Borrower Income**				Total Home Mortgage Refinance Loans	
	% of Families*	% Bank Loans*	% of Families*	% Bank Loans*	% of Families*	% Bank Loans*	% of Families*	% Bank Loans*		Over all	Low	Mod	Mid	Upper	#
MSA 8840	16.9	12.2	17.7	26.3	24.3	17.8	41.1	43.7	1.23	0.14	0.14	0.14	0.20	556	100%
Full Scope:															

(*) As a percentage of loans with borrower income information available. No information was available for 13.1% of loans originated by Bank.
 (**) Based on 1998 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

MSA /Assessment Area	Business with Revenues of \$1 million or less		Loans by Original Amount regardless of Business Size		Market Share****	Total Small Business Loans			
	% of Businesses*	% Bank Loans**	\$100,000 or Less	>\$100,000 to \$250,000		Rev \$1 million or less	#	% of Total	
MSA 8840	70.70	74.25	84.05	7.06	0.95	1.68	765	100%	73
Full Scope:									

(*) As a percentage of all businesses in the area.
 (**) As a percentage of all small business loans reported.
 (***) The market consists of all Small Business reporters in Bank's assessment area and is based on 1998 Aggregate Small Business Data only.
 (****) Based on 1998 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS State: DC, MD, VA Evaluation Period: January 1, 1997 to August 31, 1999

MSA /Assessment Area	Farms with Revenues of \$1 million or less		Loans by Original Amount regardless of Farm Size		Market Share****		Total Small Farm Loans			
	% of Farms*	% Bank Loans**	% Market Loans***	\$100,000 or Less	>\$100,000 to \$250,000	Rev \$1 million or less	All	#	% of Total	Avg Loan Size
MSA 8840										

Full Scope: Not Applicable

(*) As a percentage of all businesses in the area.
 (**) As a percentage of all small business loans reported.
 (***) The market consists of all Small Business reporters in Bank's assessment area and is based on 1998 Aggregate Small Business Data only.
 (****) Based on 1998 Aggregate Small Business Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS State: DC, MD, VA Evaluation Period: September 1, 1997 to September 30, 1999

MSA /Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments		
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s
MSA 8840	3	5,800	82	52,274	85	58,074	100%

(*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.
 (**) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM State: DC, MD, VA Evaluation Period: September 1, 1997 to October 4, 1999

MSA /Assessment Area	Branches			ATMs			Population	
	Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies	# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies	% of the Population within Each Geography
MSA 8840								

Full Scope:																	
		Low	Mid	Upp		Low	Mid	Upp									
MSA 8840	85.36	52	98.11	17.31	19.23	26.92	36.54	1.23	98.40	12.80	22.40	30.40	32.80	5.03	22.21	42.74	30.02

(*) Remaining 14.64% (\$639 million) represents deposits in foreign offices and Edge Act subsidiary.
 (**) Remaining 1.89% represents one additional branch in the assessment area and located in a NA income designated geography.
 (***) Remaining 1.60% represents two additional ATMs in the assessment area and located in a NA income designated geography.

Table 14. Geographic and Borrower Distribution of Consumer Loan Originations (Optional)

Geographic and Borrower Distribution: CONSUMER LOANS State: DC, MD, VA Evaluation Period: January 1, 1997 to August 31, 1999																					
MSA /Assessment Area	Geographic Distribution									Borrower Distribution											
	Low-Income Geographies			Moderate-Income Geographies			Upper-Income Geographies			Low-Income Borrowers			Moderate-Income Borrowers			Upper-Income Borrowers			Total Consumer Loans		
	% of Pop*	% of Bank Loans**	% of Pop* of Bank Loans**	% of Pop*	% of Bank Loans**	% of Pop* of Bank Loans**	% of Hshld S	% of Bank Loans***	% of Hshld S	% of Hshld S	% of Bank Loans***	% of Hshld S	% of Bank Loans***	% of Hshld S	% of Bank Loans***	% of Hshld S	#	% of Total			
MSA 8840	5.03	4.94	22.21	19.43	42.74	31.83	43.80	19.14	19.37	17.74	16.77	22.38	16.51	40.74	47.35	20544	100%				

(*) The percentage of the population in the MSA/Assessment area that resides in these geographies.
 (**) As a percentage of total consumer loans in geographies with income classifications.
 (***) As a percentage of loans with borrower income information available. No information was available for .52% of loans originated by Bank.