



**NEW YORK STATE BANKING DEPARTMENT**  
**CONSUMER SERVICES DIVISION**  
One State Street  
New York, NY 10004

**PUBLIC SUMMARY**

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

**Date of Evaluation:** December 31, 2006

**Institution:** NYNB Bank  
369 East 149<sup>th</sup> Street  
Bronx, NY 10455

**Note:** This evaluation is not an assessment of the financial condition of this institution. The rating assigned does not represent an analysis, conclusion or opinion of the New York State Banking Department concerning the safety and soundness of this financial institution.

---

## TABLE OF CONTENTS

	Section
General Information .....	1
Overview of Institution's Performance .....	2
Performance Context .....	3
Institution's Profile	
Assessment Area	
Performance Standards and Assessment Factors .....	4
Loan-to-Deposit Analysis and Other	
Lending-Related Activities	
Assessment Area Concentration	
Geographic Distribution of Loans	
Distribution by Borrowers Characteristics	
Action Taken in Response to Written Complaints	
With Respect to CRA	
Discrimination or Other Illegal Practices	
Process Factors	
Other Factors	
Glossary .....	5

---

## **GENERAL INFORMATION**

This document is an evaluation of the Community Reinvestment Act ("CRA") performance of NYNB Bank ("NYNB") prepared by the New York State Banking Department. The evaluation represents the Banking Department's current assessment and rating of the institution's CRA performance based on an evaluation conducted as of December 31, 2006.

Section 28-b of the New York State Banking Law, as amended, requires that when evaluating certain applications, the Superintendent of Banks shall assess a banking institution's record of helping to meet the credit needs of its entire community, including low- and moderate-income ("LMI") areas, consistent with safe and sound operations.

Part 76 of the General Regulations of the Banking Board implements Section 28-b and further requires that the Banking Department assess the CRA performance records of regulated financial institutions. Part 76 establishes the framework and criteria by which the Department will evaluate the performance. Section 76.5 further provides that the Banking Department will prepare a written report summarizing the results of such assessment and will assign to each institution a numerical CRA rating based on a 1 to 4 scoring system. The numerical scores represent an assessment of CRA performance as follows:

- (1) outstanding record of meeting community credit needs;
- (2) satisfactory record of meeting community credit needs;
- (3) needs to improve record of meeting community credit needs; and
- (4) substantial noncompliance in meeting community credit needs.

Section 76.5 further requires that the CRA rating and the written summary be made available to the public ("Evaluation"). Evaluations of small banking institutions are primarily based on a review of performance tests and standards described in Section 76.7 and detailed in Section 76.12. The tests and standards incorporate the 12 assessment factors contained in Section 28-b of the New York State Banking Law.

For an explanation of technical terms used in this report, please consult the **GLOSSARY** at the back of this document.

---

## OVERVIEW OF INSTITUTION'S PERFORMANCE

NYNB is rated "2," indicating a satisfactory record of helping to meet community credit needs. This rating is based on the following factors:

- ***Loan-to-Deposit ("LTD") Ratio and Other Lending-Related Activities:*** NYNB's LTD ratio is marginally reasonable in light of the bank's size, financial condition and the credit needs of its assessment area. Its average LTD ratio for the eight quarters ending December 31, 2006 was well below the peer average.
- ***Assessment Area Concentration:*** NYNB extended a substantial majority of loans in the assessment area. Of the total small business loans originated by NYNB during the evaluation period, 91.9% were extended in the assessment area.
- ***Geographic Distribution of Loans:*** NYNB had an excellent dispersion of its small business loans throughout the assessment area. Approximately 88.2% of its small business loans were extended in LMI areas.
- ***Distribution by Borrower Characteristics:*** The borrower characteristic of NYNB's small business loans reflected a reasonable penetration among businesses of different revenue size.
- Neither NYNB nor the New York State Banking Department received any complaints with respect to its CRA performance during the evaluation period.

This evaluation was conducted based on a review of the 12 assessment factors set forth in Section 28-b of the New York State Banking Law and Part 76 of the General Regulations of the Banking Board.

---

## PERFORMANCE CONTEXT

### Institution's Profile:

NYNB, formerly known as New York National Bank, was founded in 1982 as a federally chartered commercial bank. In 2006, the bank was acquired by Hudson Valley Holding Corp. ("HVHC") and was converted to a state charter at the time of acquisition. NYNB currently operates independently as a wholly owned subsidiary of HVHC.

On its year-end Call Report for 2006, NYNB reported total assets of \$143.8 million, of which \$53.0 million were net loans and lease finance receivables. It also reported total deposits of \$127.4 million, resulting in a loan-to-deposit ratio of 41.6%. According to the FDIC Deposit Market Share report dated June 30, 2006, NYNB obtained a market share of 0.02%, or \$111.0 million out of \$518.9 billion inside its market, ranking it 75th among 111 deposit-taking institutions in the bank's assessment area.

NYNB provides several types of credit products including secured and unsecured commercial loans to profit and not-for-profit entities, loans to municipalities, 1-4 dwelling residential mortgage loans and consumer loans.

The following is a summary of NYNB's lending portfolio, based on Schedule RC-C of the bank's December 31, 2004, December 31, 2005 and December 31, 2006 Call Reports:

<b>TOTAL GROSS LOANS OUTSTANDING</b>						
LOAN TYPE	12/31/2004		12/31/2005		12/31/2006	
	\$000	%	\$000	%	\$000	%
1-4 Residential Mortgage Loans	10,100	13.3	5,847	9.5	4,589	8.4
Commercial & Industrial Loans	14,498	19.0	11,164	18.2	15,396	28.2
Commercial Mortgage Loans	44,979	59.1	37,563	61.3	27,447	50.2
Multifamily Mortgages	5,014	6.6	5,446	8.9	4,687	8.6
Consumer Loans	1,035	1.4	866	1.4	2,334	4.2
Other Loans	455	0.6	447	0.7	196	0.4
Total Gross Loans	76,081	100.0	61,333	100.0	54,649	100.0

As illustrated in the above chart, NYNB is primarily a commercial lender, with over 50.2% of its loan portfolio in commercial mortgage loans and 28.2% in commercial and industrial loans as of December 31, 2006.

NYNB operates five banking offices: two are located in Bronx County, where its main office is located and three in New York County. Three of these branches are located in a low-income census tract and one is located in a moderate-income tract. A network of eight automated-teller-machine ("ATM") machines is located at the banking offices and four non-deposit-taking off-site ATMs are located within low-income areas of Bronx County. NYNB did not open or close any branch office during the evaluation period. Customers can bank at any NYNB and Hudson Valley Bank ("HVB") branch throughout the New York metropolitan area.

---

In addition, NYNB offers internet banking service, easy banker system, night deposit box and business debit card.

NYNB does not participate in any government guaranteed or sponsored loan programs.

NYNB received a satisfactory rating of helping to meet community credit needs at the prior Performance Evaluation conducted by the FDIC as of December 5, 2006.

There are no known financial or legal impediments that adversely affect NYNB's ability to meet the credit needs of its community.

**Assessment Area:**

NYNB's assessment area comprises all of the Bronx, New York and Westchester Counties. Bronx has the largest percentage of LMI throughout the assessment area.

<b>Distribution of Assessment Area Census Tracts by Income Level</b>							
<b>County</b>	<b>Zero</b>	<b>Low</b>	<b>Moderate</b>	<b>Middle</b>	<b>Upper</b>	<b>Total</b>	<b>LMI %</b>
Bronx	14	132	98	65	46	355	64.8
New York	9	60	59	24	144	296	40.2
Westchester	4	4	21	39	153	221	11.3
<b>Total</b>	<b>27</b>	<b>196</b>	<b>178</b>	<b>128</b>	<b>343</b>	<b>872</b>	<b>42.9</b>

The assessment area appears reasonable based upon the location of bank's offices and its lending patterns. There is no evidence that LMI areas have been arbitrarily excluded.

**Details of Assessment Area:**

The following charts show the demographic and economic data for each county of NYNB's assessment area:

*Chart #1: Shows population and income.*

*Chart #2: Shows business demographics.*

**Unemployment Rates:**

**Bronx County**

According to the U.S. Department of Labor, Bureau of Labor Statistics, Bronx County's annual unemployment rate for 2005 was 7.5% and 5.4% for December 2006, both above the state's rates of 5.0% and 3.8%, respectively.

In 2006, the major industries in Bronx County consisted of services, which made up 36.9% of the total businesses in the county followed by retail trade, which represented 23.4% of the total. Non-classifiable establishments accounted for 14.0% of the total businesses in Bronx County.

---

### New York County

According to the U.S. Department of Labor, Bureau of Labor Statistics, New York County's annual unemployment rate for 2005 was 5.1%, slightly higher than the state's annual rate of 5.0% however, the county's unemployment rate of 3.5% for December 2006, was lower than the state's rate of 3.8%.

In 2006, the major industries in New York County consisted of services, which made up 42.0% of the total businesses in the county followed by retail trade which represented 14.6% and finance, insurance and real estate, which made up 11.1% of the total. Non-classifiable establishments accounted for 15.6% of the total businesses in New York County.

### Westchester County

According to the U.S. Department of Labor, Bureau of Labor Statistics, Westchester County's annual unemployment rate for 2005 was 4.1% and 3.1% as of December 2006, both below the state's rates of 5.0% and 3.8%, respectively.

In 2006, the major industries in Westchester County consisted of services, which made up 40.7% of the total businesses in the county followed by finance, insurance and real estate, which represented 9.8% of the total. Non-classifiable establishments accounted for 15.1% of the total businesses in Westchester County.

CHART # 1

<b>ASSESSMENT AREA POPULATION AND INCOME CHARACTERISTICS BY COUNTY</b>																						
COUNTY	Total Population	Age 65 and over		Age 16 and less		Median Family Income(MFI)	HUD MSA MFI	# of Households		# of HH below poverty level		Total Families	Low income		Moderate income		Middle income		Upper income		LMI families in LMI tracts	
		#	%	#	%			#	%	#	%		#	%	#	%	#	%	#	%	#	%
<b>Bronx</b>	1,332,650	133,948	10.1	356,895	26.8	33,099	59,200	463,242	134,404	29.0	317,248	133,175	42.0	58,715	18.5	51,854	16.3	73,504	23.2	163,697	85.3	
<b>New York</b>	1,537,195	186,776	12.2	229,772	14.9	71,629	59,200	739,167	123,037	16.6	306,220	89,281	29.2	40,700	13.3	38,804	12.7	137,435	44.9	100,358	77.2	
<b>W'chester</b>	923,459	128,964	14.0	207,207	22.4	89,228	59,200	337,486	28,554	8.5	237,010	30,205	12.7	24,729	10.4	33,274	14.0	148,802	62.8	14,189	25.8	
<b>TOTAL A/A*</b>	3,793,304	449,688	11.9	793,874	20.9	62,271	59,200	1,539,895	285,995	18.6	860,478	252,661	29.4	124,144	14.4	123,932	14.4	359,741	41.8	278,244	73.8	

\* Assessment Area

CHART # 2

<b>BUSINESS DEMOGRAPHICS BY COUNTY</b>											
<b>COUNTY AND ASSESSMENT AREA(A/A)</b>	Number of Businesses	Businesses with Rev. of \$1 million or less		Businesses with Rev. of more than \$1 million		Bussinesses with no revenues reported		Businesses with less than 50 employees		Operating from a single location	
		#	%	#	%	#	%	#	%	#	%
<b>BRONX</b>	45,306	31,417	69.3	1,917	4.2	11,972	26.4	34,396	75.9	42,120	93.0
<b>NEW YORK</b>	239,606	149,793	62.5	23,141	9.7	66,672	27.8	178,656	74.6	211,138	88.1
<b>WESTCHESTER</b>	85,919	59,201	68.9	4,912	5.7	21,806	25.4	66,518	77.4	78,747	91.7
<b>Total A/A</b>	370,831	240,411	64.8	29,970	8.1	100,450	27.1	279,570	75.4	332,005	89.5

---

## **PERFORMANCE STANDARDS AND ASSESSMENT FACTORS**

*NYNB's performance was evaluated according to the Small Bank Performance criteria, which include the following: (1) Loan-to-Deposit Ratio and other Lending-Related Activities; (2) Assessment Area Concentration; (3) Geographic Distribution of Loans; (4) Distribution by Borrower Characteristics; and (5) Action Taken in Response to Written Complaints Regarding CRA.*

The evaluation period for this report covers calendar year 2006. The demographic data referenced in this evaluation were obtained from the 2000 U.S. Census.

Small business loan was the only product considered in evaluating factors (2), (3) and (4), as noted above. Aggregate data was not used for comparison since NYNB is not required to report small business loan originations. Instead, NYNB's performance was evaluated in comparison with the demographics of the assessment area.

- **Loan-to-Deposit Ratio Analysis: "Satisfactory"**

NYNB's LTD ratio is marginally reasonable considering its size, financial condition and the credit needs of its assessment area.

NYNB's average LTD ratio for the eight quarters ending December 31, 2006 was 50.3%, which is well below the peer average ratio of 82.1%.<sup>1</sup> During the evaluation period, NYNB's LTD ratios have fluctuated from 58.37% in June 2005 to 41.56% in December 2006, as there has been a change in ownership and management of the bank. However, the new management has made efforts to increase the volume of lending.

The following table shows quarterly comparative percentages of the average LTD ratios of NYNB and the peer group during the evaluation period:

<b>Loan-to-Deposit Ratios</b>									
	3/31/05	6/30/05	9/30/05	12/31/05	3/31/06	6/30/06	9/30/06	12/31/06	Average LTD
Bank	58.06	58.37	52.95	50.54	48.35	48.45	44.38	41.56	50.33
Peer	80.73	81.74	81.85	81.72	81.81	83.15	83.36	82.46	82.10

---

<sup>1</sup> These ratios were calculated from information shown in the bank's Uniform Bank Performance Report ("UBPR") as prepared by the FDIC. The bank's peer group includes all insured commercial banks having assets between \$300 million and \$1 billion. The UBPR peer group is a national peer group and includes banks that may be operating in very different economic environments.

- **Assessment Area Concentration: “Outstanding”**

NYNB originated a substantial majority of its loans within the assessment area. During the evaluation period, NYNB extended 91.9% by number and 94.4% by dollar volume of its small business loans inside the assessment area. Details are provided in the table below:

<b>Distribution of Loans Inside and Outside of the Assessment Area</b>										
Loan Type	Number of Loans					Loans in Dollars (in thousands)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Small Business 2006	34	91.9	3	8.1	37	7,737	94.4	460	5.6	8,197
<b>Total</b>	<b>34</b>	<b>91.9</b>	<b>3</b>	<b>8.1</b>	<b>37</b>	<b>7,737</b>	<b>94.4</b>	<b>460</b>	<b>5.6</b>	<b>8,197</b>

- **Geographic Distribution of Loans: “Outstanding”**

The geographic distribution of NYNB’s small business loans reflected an excellent dispersion among census tracts of different income levels.

In 2006, NYNB extended 88.2% of its small business loans in LMI areas, an excellent penetration rate given that only 19.7% of total businesses in the assessment area are located in LMI geographies.

The following chart provides a summary of NYNB’s small business lending distribution during the evaluation period:

<b>Distribution of Small Business Loans by Geographic Income Level</b>						
Geography	Bank				Distribution of Total Businesses	
Income Level	#	%	\$000	%	# *	%
Low	24	70.6	4,697	60.7	32,418	8.8
Moderate	6	17.6	1,850	23.9	40,182	10.9
Middle	0	0.0	0	0.0	39,376	10.7
Upper	4	11.8	1,190	15.4	251,739	68.3
NA	0	0.0	0	0.0	4,961	1.3
<b>Total</b>	<b>34</b>	<b>100.0</b>	<b>7,737</b>	<b>100.0</b>	<b>368,676</b>	<b>100.0</b>

\* excludes farms

---

- **Distribution by Borrower Characteristics: “Satisfactory”**

The distribution of NYNB’s small business loans based on borrower characteristics reflects a reasonable dispersion among businesses of different revenue sizes.

In 2006, NYNB originated 38.2% of its small business loans to businesses with gross annual revenues of \$1 million or less. The rate is below the 64.7% small businesses with revenues of \$1 million within the assessment area. However, 44.2% of NYNB’s small business loans were issued to companies that did not report revenue size.

The following chart provides a summary of NYNB’s small business lending distribution during the evaluation period based on borrower revenues:

<b>Distribution of Small Business Loans by Business Revenue Size</b>						
<b>Revenue Size</b>	<b>Bank</b>				<b>Distribution of Total Businesses</b>	
	<b>#</b>	<b>%</b>	<b>\$000</b>	<b>%</b>	<b># *</b>	<b>%</b>
\$1 million or less	13	38.2	3,374	43.6	238,503	64.7
Over \$1 million	6	17.6	1,346	17.4	29,812	8.1
Not reported	15	44.2	3,017	39.0	100,361	27.2
<b>Total</b>	<b>34</b>	<b>100.0</b>	<b>7,737</b>	<b>100.0</b>	<b>368,676</b>	<b>100.0</b>

\* excludes farms

- **Action Taken In Response to Written Complaints With Respect to CRA**

Neither NYNB nor the New York State Banking Department has received any written complaints regarding the bank’s CRA performance.

- **Discrimination and other Illegal Practices**

**Any practices intended to discourage applications for types of credit set forth in the banking institution’s CRA Public File.**

Examiners noted no practices that were intended to discourage applications for the types of credit offered by the institution.

**Evidence of prohibited discriminatory or other illegal credit practices.**

The regulatory compliance and fair lending examinations conducted concurrently with this examination, indicate satisfactory adherence to anti-discrimination and other applicable laws and regulations. No evidence of prohibited discriminatory or other illegal credit practices was noted.

---

- **Process Factors**

**Activities conducted by the banking institution to ascertain the credit needs of its community, including the extent of the banking institution's efforts to communicate with members of its community regarding the credit services being provided by the banking institution.**

Representatives of NYNB meet with local, civic and religious leaders, small business groups and community organizations to identify financial needs. NYNB has a community outreach officer who provides technical expertise to various community organization and is involved in economic development activities, affordable housing, child care, health and social services for the benefit of low and moderate income individuals in the assessment area.

**The extent of the banking institution's marketing and special credit-related programs to make members of the community aware of the credit services offered by the banking institution.**

NYNB does not advertise, but it participates in financial services seminars, which are available throughout the year at various locations in the community. These activities provide the opportunity for the bank to make members of the community aware of its credit services.

**The extent of participation by the banking institution's board of directors/trustees in formulating the banking institution's policies and reviewing its performance with respect to the purposes of the Community Reinvestment Act.**

NYNB's Board of Directors established the Board CRA and Compliance Committee, consisting of Board members and Management. The Board oversees and monitors the bank's CRA performance through these committees. Both committees meet quarterly.

- **Other Factors**

**Other factors that in the judgment of the Superintendent and Banking Board bear upon the extent to which a banking institution is helping to meet the credit needs of its entire community.**

None noted.

---

## **GLOSSARY**

### **Aggregate**

The cumulative lending by all HMDA-reporting lenders in the same geographic area under evaluation.

### **Community Development**

The term “community development” is defined to mean:

1. Affordable housing (including multifamily housing) for low- or moderate-income (“LMI”) individuals;
2. Community services targeted to LMI individuals;
3. Activities that promote economic development by financing business or farms that meet the size eligibility standards of the United States Small Business Administration (“SBA”) Development Company or Small Business Investment Company programs, or have gross annual incomes of \$1 million or less;
4. Activities that revitalize or stabilize LMI geographies; and
5. Activities that seek to prevent defaults and/or foreclosures in loans included in (1) and (3), above.

A “community development loan” is defined as a loan that has as its *primary purpose* community development. This includes but is not limited to loans to:

- Borrowers for affordable housing rehabilitation and construction, including construction and permanent financing for multifamily rental property serving low or moderate income (“LMI”) persons;
- Nonprofit organizations serving primarily LMI or other community development needs;
- Borrowers to construct or rehabilitate community facilities that are located in LMI areas or that primarily serve LMI individuals;
- Financial intermediaries including community development financial institutions, community development corporations, minority- and women-owned financial institutions, community loan funds or pools, micro-finance institutions, and low-income or community development credit unions that primarily lend or facilitate lending to promote community development;
- Local, state and tribal governments for community development activities; and
- Borrowers to finance environmental clean up or redevelopment of an industrial site as part of an effort to revitalize the LMI community in which the property is located.

A “qualified investment” is defined as a lawful investment, deposit, membership share or grant that has as its *primary purpose* community development. This includes but is not limited to investments, deposits, membership shares or grants in or to:

- 
- Financial intermediaries (including community development financial institutions, community development corporations, minority- and women-owned financial institutions, community loan funds, micro-finance institutions and low-income or community development credit unions) that primarily lend or facilitate lending in LMI areas or to LMI individuals in order to promote community development;
  - Organizations engaged in affordable housing rehabilitation and construction;
  - Organizations, including, for example, small business investment corporations that promote economic development by financing small businesses;
  - Facilities that promote community development in LMI areas or LMI individuals, such as youth programs, homeless centers, soup kitchens, health care facilities, battered women's centers, and alcohol and drug recovery centers;
  - Projects eligible for low-income housing tax credits;
  - State and municipal obligations, such as revenue bonds that specifically support affordable housing or other community development needs;
  - Organizations serving LMI housing or other community development needs, such as counseling for credit, home ownership, home maintenance, and other financial services education; and
  - Organizations supporting activities essential to the capacity of LMI individuals or geographies to utilize credit to sustain economic development, such as day care operations and job training programs that facilitate access to permanent jobs.

A "community development service" is defined as a service that has as its *primary purpose* community development, is related to the provision of financial services, and has not been considered in the evaluation of the banking institution's retail banking services. This includes but is not limited to:

- Providing technical assistance on financial matters to nonprofit, tribal or government organizations serving LMI housing or economic revitalization and development needs;
- Providing technical assistance on financial matters to small businesses or community development organizations;
- Lending employees to provide financial services for organizations facilitating affordable housing construction and rehabilitation or development of affordable housing;
- Providing credit counseling, home buyers and home maintenance counseling, financial planning or other financial services education to promote community development and affordable housing;
- Establishing school savings programs for LMI individuals;
- Providing seminars for LMI persons on banking and bank account record-keeping;
- Making ATM "Training Machines" available for extended periods at LMI community sites or at community facilities that serve LMI individuals; and
- Technical assistance activities to community development organizations such as:
  - ❖ Serving on a loan review committee;
  - ❖ Developing loan application and underwriting standards;
  - ❖ Developing loan processing systems;

- 
- ❖ Developing secondary market vehicles or programs;
  - ❖ Assisting in marketing financial services, including the development of advertising and promotions, publications, workshops and conferences;
  - ❖ Furnishing financial services training for staff and management;
  - ❖ Contributing accounting/bookkeeping services; and
  - ❖ Assisting in fund raising, including soliciting or arranging investments.

### **Home Mortgage Disclosure Act (“HMDA”)**

The Home Mortgage Disclosure Act, enacted by Congress in 1975, and subsequently amended, requires institutions to annually report data about applications for residential (including multifamily) financing.

### **Loans to Small Businesses**

Small business loans to businesses with gross annual revenues of \$1 million or less.

### **Low or Moderate Income (“LMI”) Geographies**

Those census tracts or block numbering areas (“BNAs”), where according to the 2000 US Census, the median family income is less than 80% of the area median family income. In the case of tracted areas that are part of a Metropolitan Statistical Area (“MSA”) or Primary Metropolitan Statistical Area (“PMSA”), this would relate to the median family income for the MSA or PMSA in which the tracts are located. In the case of BNAs and tracted areas that are not part of a MSA or PMSA, the area median family income would be the statewide non-metropolitan median family income.

### **LMI Borrowers**

Borrowers whose income, as reported on the loan application which the lender relied upon in making the credit decision, is less than 80% of the area median family income. In the case where the residential property is located in a MSA or PMSA, this would relate to the median family income for that MSA or PMSA. Otherwise, the area median family income would be the statewide non-metropolitan median family income. In all instances, the area median family incomes used to measure borrower income levels are updated annually by the U.S. Department of Housing and Urban Development (“HUD”).

### **LMI Individuals/Persons**

Those individuals, whose income is less than 80% of the area median family income. In the case where the individual resides in a MSA or PMSA, this would relate to the median family income for that MSA or PMSA. Otherwise, the area median family income would be the statewide non-metropolitan median family income. In all

---

instances, the area median family incomes used to measure individual income levels are updated annually by HUD.

**LMI Penetration Rate**

A number that depicts the percentage of a bank's total loans (for a particular product) that was extended to LMI geographies or borrowers. For example, an LMI penetration rate of 20% would indicate that the bank made 20 out of a total of 100 loans to LMI geographies or borrowers.

**Small Business Loans**

Loans to businesses with original amounts of \$1 million or less.