

## OFFICE OF THE CITY CLERK

## 2016 FEB 25 PM 5: ACCENDA REPORT

TO: Sabrina B. Landreth

City Administrator

FROM: Katano Kasaine

Treasurer

**SUBJECT:** Community and Economic

Investments Made by Chase

Bank in Oakland

DATE: February 11, 2016

City Administrator

Approval

Date:

#### RECOMMENDATION

Staff Recommends That The City Council Receive An Informational Report On Community And Economic Investments Made By Chase Bank In Oakland Since They Received The City Of Oakland's Banking Contract In 2014 And Data Analysis On Foreclosures Between 2007 And 2015.

#### **EXECUTIVE SUMMARY**

In March 2014, J.P. Morgan Chase, N.A. ("JPMorgan," "Chase Bank," or the "Bank") assumed the role of the City's primary depository service bank. Upon acceptance of this role, the Bank agreed to provide the City with certain information regarding its community and economic investments within Oakland. Per City Council's directive, this informational report conveys information provided by JPMorgan concerning their branch locations, home mortgage loans. foreclosures, small business loans, community development activities, and media outreach within Oakland.

#### BACKGROUND / LEGISLATIVE HISTORY

On December 10, 2013, the City Council adopted Resolution No. 64764 C.M.S. (the "Resolution") authorizing the City Administrator to negotiate and execute an agreement(s) with J.P. Morgan Chase, N.A. to provide the City with primary depository services and additional banking services, as appropriate, for a period of three years (the "Agreement").

The Resolution requires that JPMorgan, the financial institution, continue to provide information specific to Oakland, especially its low and moderate income communities, on their lending, services, and investment activities including business loans, home loans, branch locations, and media outreach for historically underserved communities.

The Resolution also requires that by the end of the second year of the Agreement, JPMorgan deliver information on the census tract or zip code level that will promote efforts of the Department of Housing and Community Development.

Item:

Finance & Management Committee March 8, 2016 At the City Council's Finance and Management Committee meeting on January 12, 2016, members of the Committee and Oakland community provided follow-up questions and requested additional details regarding the data and information initially provided by JPMorgan.

In addition, a supplemental informational memorandum has been provided to convey answers to questions on topics not discussed in this report.

#### **ANALYSIS AND POLICY ALTERNATIVES**

Date: February 11, 2016

In March 2014, JPMorgan assumed the role of the City's primary depository service bank. The City required that JPMorgan provide information on their lending, services, and investment activities including business loans, home loans, branch locations, and media outreach for historically underserved communities specific to Oakland, especially its low and moderate income communities. City Council also requested that JPMorgan provide data on foreclosure activity in Oakland. In follow-up, additional information was requested concerning the initial data and information provided by JPMorgan. Following is the information, data, and response from JPMorgan. Refer to *Attachment A* for the additional data provided by JPMorgan in question and answer format. *Attachment A* was also published as part of the above referenced supplemental informational memorandum on February 22, 2016.

#### Oakland Presence

JPMorgan has approximately 120,000 consumer and 7,400 small business customers located in Oakland. JPMorgan currently operates nine Chase Bank branches with 28 ATM's in Oakland. Additionally, there are six separate ATM locations in Oakland. JPMorgan's banking services may also be accessed through online, mobile, and credit card delivery channels. They acquired eight branches in Oakland through the Washington Mutual ("WaMu") transaction and today have nine branches in Oakland. While there are no near term plans to open a new branch in Oakland, JPMorgan is working in cooperation with City staff to identify potential locations for future additional branches and ATMs.

The Chase Bank branch at 10800 International Boulevard, Oakland, CA 94603 was closed on October 8, 2015 as part of a national branch consolidation strategy. JPMorgan announced, in February 2015, a plan to reduce branches nationwide by about 300 by the end of 2016 as a result of changing consumer behavior. Branch transaction volumes are declining as customers increase their use of remote channels (such as mobile apps and Chase.com). Per JPMorgan, these consumer behavior changes are occurring across the financial services industry.

JPMorgan continually reviews their branch network and makes adjustments, as needed, based on the changing market and banking habits of their customers. To ensure the least disruption possible when closing branches, JPMorgan considers the proximity of other branches when assessing a branch for closure. For example, there are two Chase Bank branches less than one mile from the former International Boulevard branch. According to JPMorgan, these branches are able to serve the customers who previously banked at the International Boulevard branch. These customers can also bank online at Chase.com or via the Chase Mobile App.

Subject: JPMorgan Lending and Community Investments within Oakland

Date: February 11, 2016

Home Mortgage Lending

During 2013 and 2014 combined, JPMorgan originated or purchased 2,042 home mortgage loans totaling approximately \$1.04 billion in Oakland. On the basis of the number of loans, 19 percent totaling \$52 million were made to Low- and Moderate- Income ("LMI") customers and 43 percent totaling \$449 million were made for homes located in LMI communities. The following *Table 1* provides consolidated information on JPMorgan's home mortgage loans in Oakland. Please note that certain census tracts fall into two or more Council Districts. Per JPMorgan, the decline in lending between 2013 and 2014 is reflective of the declines in the home mortgage market overall. Please reference *Attachment B*: Home Mortgage Loans by Census Tract and *Attachment C*: Census Tracts and Council Districts for additional details.

Per the Community Reinvestment Act ("CRA"), Home Mortgage Disclosure Act ("HMDA") and other implementing regulations, Low and Moderate Income is described on both an income level for individuals as well as for geography, which refers to a census tract. Low-Income refers to an individual income that is less than 50 percent of the area median income or, in the case of geography, a median family income that is less than 50 percent of the area median family income. Moderate-Income refers to an individual income that is at least 50 percent and less than 80 percent of the area median income, or, in the case of geography, a median family income that is at least 50 percent and less than 80 percent of the area median family income. For example, an Oakland resident's income will be considered as Low-Income if it is less than 50 percent of the median income of the Oakland-Hayward-Berkeley, CA MSA, the applicable statistical area. A census tract, the geography, within Oakland will be considered Low-Income if the median family income in that census tract is less than 50 percent of the median family income of the Oakland-Hayward-Berkeley, CA MSA. Please reference *Attachment D*: Home Mortgage Loans by Income Level for a summary of JPMorgan's home mortgage loans in Oakland.

Page 3

Page 4

Date: February 11, 2016

# Table 1 City of Oakland, CA JPMorgan – Home Mortgage Loans Census Tract Data Consolidated by City Council District

		2014		2013
City Council District	Total Loan Units	Total Loan Amount (\$000s)	Total Loan Units	Total Loan Amount (\$000s)
District 1	114	\$73,437	220	\$114,984
District 2	103	\$82,710	146	\$83,665
District 3	77	\$72,087	128	\$89,787
District 4	154	\$76,231	254	\$110,371
District 5	39	\$22,027	52	\$20,574
District 6	86	\$30,277	113	\$35,163
District 7	55	\$16,994	89	\$21,006
Split between District 1 & District 4	31	\$21,342	50	\$22,475
Split between District 2 & District 3	26	\$22,864	24	\$13,737
Split between District 2 & District 5	24	\$12,697	52	\$24,109
Split between District 4 & District 5	32	\$17,378	39	\$13,900
Split between District 4 & District 6	30	\$10,744	48	\$16,361
Split between Dist. 4, Dist. 5, & Dist. 6	10	\$3,124	23	\$6,496
Split between District 5 & District 6	0	\$0	2	\$326
Split between District 6 & District 7	7	\$1,458	14	\$3,582
City Total	788	\$463,370	1,254	\$576,536

JPMorgan refers the City to <a href="www.ffiec.gov/hmdaadwebreport/DisWelcome.aspx">www.ffiec.gov/hmdaadwebreport/DisWelcome.aspx</a> for publicly available data that can be used to compare their home mortgage lending activity with other lenders and in other locations. This data is provided in compliance with the HMDA and geocoded by Metropolitan Statistical Area/Metropolitan Division ("MSA/MD"). The City is included in MSA/MD: 36084 - Oakland-Hayward-Berkeley, CA. A sample of the available data is provided as **Attachment E**.

Staff has reached out to various lenders for comparison data regarding their HMDA home mortgage loans. *Table 2* provides a summary of the loan data provided. In 2013 and 2014, on the basis of the number of loans, 43 percent totaling \$449 million of JPMorgan's loans were made for homes located in LMI communities while 52 percent totaling \$83 million of Citi's loans were made for homes located in LMI communities. In 2014, on the basis of the number of loans, 51 percent totaling \$189 million of Wells Fargo's loans were made for homes located in LMI communities and 18 percent were made to LMI borrowers. Additional details provided by the other lenders can be found in *Attachment F*.

Item: \_\_\_\_\_ Finance & Management Committee March 8, 2016

Page 5

# Table 2 City of Oakland, CA HMDA Home Mortgage Loans Lender Comparison

		2014	2013		
	Total Total Loan Units Amount (\$000s)		Total Loan Units	Total Amount (\$000s)	
JPMorgan	788	\$463,370	1,254	\$576,536	
Wells Fargo	1,159	\$479,797	2,279	\$873,485	
Bank of America	683	\$259,800	1,298	\$433,026	
Citi	162	\$69,481	504	\$159,193	

Greenlining, a policy, research, organizing, and leadership institute working for racial and economic justice, has provided the data in *Table 3* for comparison of home mortgage loan originations in 2013 among lenders. Their data for 2014 is not yet available. Refer to *Attachment G* for additional race and ethnicity data provided by Greenlining.

Table 3
City of Oakland, CA
2013 Home Mortgage Loan Originations
Lender Comparison by Race & Ethnicity

	Wells Fargo		JPMorgan		Bank of America		Citibank		Fremont Bank	
Race/Ethnicity*	Total Loan Units	Total Amount (\$000s)								
White	117	\$46,478	46	\$11,871	62	\$24,326	30	\$11,288	9	\$4,094
Asian Americans	54	\$20,016	16	\$6,735	30	\$8,657	16	\$4,096	18	\$3,663
Hispanic	19	\$4,314	14	\$3,676	14	\$3,503	4	\$495	0	\$0
African Americans	13	\$4,776	9	\$3,076	10	\$1,537	4	\$1,563	1	\$375
Not Disclosed	9%		32%		14%		20%		48%	

<sup>\*</sup>Individuals, particularly in the Hispanic group, may be included in more than one Race/Ethnicity category Source: Greenlining Institute and Urban Strategies Center for Greenlining: Locked Out of the Market: Poor Access to Home Loans for Californians of Color, February 2016

#### Foreclosure Activity

In regards to distressed residential properties, JPMorgan's Community Revitalization Program focuses on property remediation for bank-owned, residential properties. For the period of 2010-2013, JPMorgan owned 40 properties in Oakland that were managed through this program. Under the program, properties are donated or sold at a discount to Bank approved, local not-for-profit agencies. Of the 40 distressed properties, 13 were donated and 27 were sold at a discount to agencies including Habitat for Humanity East Bay and Rebuilding Together Oakland. There were up to 12 local not-for-profit agencies participating in the program in Oakland. While JPMorgan does not currently own any distressed single family residential properties in Oakland, it monitors properties that become eligible for the program on an ongoing basis.

Item:
Finance & Management Committee
March 8, 2016

Subject: JPMorgan Lending and Community Investments within Oakland

Date: February 11, 2016

Page 6

Data dating back to 2007 was not provided by JPMorgan. JPMorgan does not report on foreclosures by race, ethnicity, or census tract and the information is not is not available for public disclosure.

Small Business Lending

JPMorgan is active in the area of small business lending providing products including lines of credit, term loans, SBA financing, commercial real estate financing, business credit cards, and trade financing. In 2013-2014, JPMorgan originated 2,107 small business loans totaling \$34.9 million in Oakland of which 53 percent were located in LMI communities. The total number and amount of loan originations in LMI communities increased by 50 percent and 25 percent, respectively, between 2013 and 2014. The following *Table 4* provides information on JPMorgan's small business loans in Oakland. Please note that data for small business loans was not provided by census tract.

Page 7

## Table 4 City of Oakland, CA JPMorgan – Small Business Loans

	Loan Amount at Origination <=\$100,000		Loan Ar at Origir >\$100,00 <=\$250	nation 00 But	Loan Ar at Origir >\$250	nation	Loans to Bu with Gross Revenue Milli	s Annual s <= \$1
Area Income Characteristics*	Number of Loans	Amount (\$000s)	Number of Loans	Amount (\$000s)	Number of Loans	Amount (\$000s)	Number of Loans	Amount (\$000s)
2014								
< 10%	4	\$44	0	· \$0	0	\$0	0	\$0
10-20%	11	\$105	1	\$200	1	\$600	1	\$200
20-30%	39	\$277	0	\$0	0	\$0	0	\$0
30-40%	175	\$1,887	1	\$150	2	\$700	1	\$37
40-50%	94	\$1,171	0	\$0	1	\$555	2	\$167
50-60%	140	\$1,359	1	\$110	1	\$750	1	\$75
60-70%	86	\$1,033	0	\$0	1	\$700	0	\$0
70-80%	106	\$1,001	1	\$125	0	\$0	1	\$125
80-90%	27	\$293	0	\$0	0	\$0	0	\$0
90-100%	15	\$157	0	\$0	0	\$0	0	\$0
100-110%	67	\$797	1	\$150	0	\$0	0	\$0
110-120%	80	\$887	0	\$0	0	\$0	0	\$0
>= 120%	421	\$5,342	0	\$0	1	\$309	4	\$276
Tract Not Known	4	\$44	0	\$0	0	\$0	0	\$0
TOTAL	1,269	\$14,397	5	\$735	7	\$3,614	10	\$880
2013								
< 10%	1	\$2	0	\$0	0	\$0	0	\$0
10-20%	10	\$178	0	\$0	0	\$0	0	\$0
20-30%	18	\$339	0	\$0	0	\$0	3	\$147
30-40%	116	\$1,552	1	\$150	4	\$1,488	4	\$1,028
40-50%	54	\$528	1	\$200	0	\$0	0	\$0
50-60%	92	\$920	0	\$0	1	\$750	1	\$15
60-70%	55	\$646	0	\$0	0	\$0	0	\$0
70-80%	82	\$976	0	\$0	0	\$0	3	\$149
80-90%	21	\$277	0	\$0	0	\$0	0	\$0
90-100%	3	\$49	0	\$0	0	\$0	0	\$0
100-110%	40	\$526	1	\$250	0	\$0	1	\$50
110-120%	57	\$751	0	\$0	0	\$0	0	\$0
>= 120%	243	\$3,460	0	\$0	1	\$775	2	\$70
Tract Not Known	1	\$2	0	\$0	0	\$0	0	\$0
TOTAL	793	\$10,206	3	\$600	6	\$3,013	14	\$1,459

<sup>\*</sup>Income characteristics calculated per Oakland-Hayward-Berkeley, CA MD (MSA 36084)

Item: \_\_\_\_ Finance & Management Committee March 8, 2016

Page 8

Per staff's request, Table 5 contains data on small business loans provided by Citi.

## Table 5 City of Oakland, CA Citi – Small Business Loans

	Loan A at Origi <=\$10	nation	Loan A at Orig >\$100,0 <=\$25	ination 000 But	Loans to B with Gros Rever	s Annual nues
	Number of Loans	Amount (\$000)	Number of Loans	Amount (\$000)	Number of Loans	Amount (\$000)
2014	636	\$3,932	1	\$200	345	\$2,345
2013	597	\$4,217	1	\$150	358	\$2,617

Per Wells Fargo, they extended 1,856 small business loans totaling \$80 million in 2014.

Publicly available data for small business loans is available at <a href="https://www.ffiec.gov/craadweb/DisRptMain.aspx">www.ffiec.gov/craadweb/DisRptMain.aspx</a>. This data is provided in compliance with the CRA and geocoded by state and county. The City is included in Alameda County. This data can be used to compare small business loan activity between lenders and locations. A sample of the available data is provided as **Attachment H**.

#### Community Development Initiatives

JPMorgan's national community development programs which are active in Oakland include Community Development Loans, Community Development Investments, and Community Development Grants. Community Development Loans, Investments, and Grants are loans, investments, and grants, respectively, provided to not-for-profits designed for the express purpose of revitalizing or stabilizing low- or moderate-income areas, or providing affordable housing for, or community services targeted to, low- or moderate-income persons. *Table 6* summarizes JPMorgan's Community Development Loans, Investments, and Grants for 2013 and 2014. JPMorgan is actively working with City staff to identify potential community investment and affordable housing projects. JPMorgan does not provide this data as a percentage of profit or revenue.

Table 6
City of Oakland, CA
JPMorgan – Community Development Loans, Investments, & Grants

7	2014		2013		
	Total Units	Total Amount	Total Units	Total Amount	
Community Development Loans	63	\$91.7 million	46	\$71.1 million	
Community Development Investments	2	\$4.9 million	7	\$9.2 million	
Community Development Grants	5	\$0.3 million	9	\$0.67 million	

JPMorgan 's Community Development Loans include construction and permanent financing for the Cathedral Gardens Apartments and AveVista Apartments, which were completed in 2015

Item:
Finance & Management Committee
March 8, 2016

Page 9

and serve low-income families in downtown Oakland. For Cathedral Gardens, a 100-unit apartment complex housing low-income families, JPMorgan provided \$21 million in construction financing and \$9.5 million in permanent financing. For AveVista, a 68-unit apartment complex housing low-income families, JPMorgan provided \$8 million in construction financing and \$6 million in permanent financing.

JPMorgan's Community Development Investments include Low-Income Housing Tax Credits ("LIHTC") and New Market Tax Credits ("NMTC"). JPMorgan's 2014 investments include a NMTC investment in Vincent Academy, a tuition-free charter public elementary school located in West Oakland, for the construction of a new building which was completed in 2015.

JPMorgan's 2015 Community Development Grants with local impact include grants to Northern California CLF and OBDC Small Business Finance and Opportunity Fund and Craft3. JPMorgan's 2014 philanthropic activities in Oakland included \$765,150 in grants and donations to community organizations. Amounts contributed ranged from \$500 to \$200,000 and were given to organizations such as the East Bay Community Foundation (2014 Oakland Mayor's Summer Jobs Program), College Track Oakland, Unity Council of Alameda Co., and International Rescue Committee.

JPMorgan refers the City to <a href="www.ffiec.gov/craadweb/DisRptMain.aspx">www.ffiec.gov/craadweb/DisRptMain.aspx</a> for publicly available data that can be used to compare their community development loan activity with other lenders. This data is provided in compliance with the CRA and geocoded nationally. A sample of the available data is provided as **Attachment I**.

In response to requests for improved services in under-represented communities, a listing of projects that create opportunity for low- income residents, descriptions of partnership and sponsorship expansion with local non-profits, outlines of improving access to banking services in Oakland, and descriptions of efforts regarding OBDC and other partnerships, JPMorgan has provided the following list of community initiatives. JPMorgan's corporate responsibility work is focused on supporting economic expansion and progress in their communities and working with local leaders to help develop strategies to bolster the long-term vitality of the world's cities. JPMorgan is investing in workforce skills, supporting small businesses, and expanding the global financial capabilities of consumers. In Oakland, JPMorgan is engaged in many initiatives, including but not limited to the following:

#### FY 2012- FY2015

 JPMorgan Chase is the lead California sponsor of College Track, an Oakland based organization that empowers students from underserved communities to graduate from college. The firm has contributed more than \$2.2 million in grants to expand College Track's services and serve more students in its five California Centers in Oakland, Bayview Hunters Point (SF), East Palo Alto, Boyle Heights (LA) and Sacramento.

#### FY 2013-FY2015

 Grants totaling \$1.75 million to provide continued support to the LaunchPath Work-Based Learning Employer Engagement Project, an innovative project connecting employers, educators, and students to close the skills gap and strengthen the workforce. The most recent grant of \$200,000 for the Bay Area Employer Engagement Project will enable them to

Item:
Finance & Management Committee
March 8, 2016

Page 10

facilitate a one-year regional initiative with thirteen East Bay Community Colleges to broker internships on the LaunchPath platform.

#### FY 2015

- \$2.1 million grant to the CDFI Collaborative of Northern California Community Loan Fund ("NCCLF") and OBDC Small Business Finance to support economic development, small business growth, and affordable housing along the International Boulevard commercial corridor in Oakland where a bus rapid transit line is being built. NCCLF and OBDC will coordinate a multi-lender commercial corridor financing initiative that will provide a comprehensive set of products and services to support economic development projects, small business growth, and affordable housing development.
- \$2.6 million grant to support an innovative partnership between Opportunity Fund, Craft3, and Lending Club which will deploy \$10 million in new loans to 400 low- and moderate-income small business owners in order to close the financing gap, provide access to affordable capital, and promote job retention and creation. The fund will serve LMI small business owners in high poverty areas in Oakland, Los Angeles, San Diego, San Francisco, Portland, and Seattle.
- \$250,000 grant to support the Youth Jobs+ Initiative led by United Way of the Bay Area
  ("UWBA"), a year-round public-private partnership to help young adults find employment in
  San Francisco and Oakland. The goal in Oakland is, with UWBA's programmatic knowledge,
  leadership, and understanding of best practices in place, to help support the City's goal to
  provide 1,850 youth with work experience and directly place 100 youth in internships, entrylevel jobs, and other work-based learning opportunities over the summer.
- \$150,000 grant to support the Bay Area Workforce Funding Collaborative's ongoing efforts
  to build the workforce training capacity of Bay Area community colleges and to strengthen
  the region's workforce training system. Two of the four current community college recipients
  are in the East Bay: Merritt's Allied Health Program and Laney's Bio-Manufacturing
  Program.
- \$150,000 grant to support the Unity Council's job training programs for low-income individuals of Alameda County in allied healthcare, technology and the building trades. Additionally, the firm sponsors the Annual Día de los Muertos festival which draws more than 50,000 community residents to the Fruitvale District.
- \$100,000 grant to Oakland-based OBDC Small Business Finance to support their efforts
  creating economic opportunity by empowering entrepreneurs with a focus on veterans and
  Oakland businesses affected by the BRT line expansion. Through innovative partnerships,
  OBDC provides business owners with capital, education, and relationships. Their approach
  helps borrowers create jobs and stimulate economic development in low-to-moderate
  income communities.
- \$100,000 grant to Inner City Advisors to provide support for the identification and investment in high-impact entrepreneurs committed to scaling their businesses and creating good jobs for a diverse workforce.
- \$75,000 grant to East Bay Asian Local Development Corporation ("EBALDC") to support Healthy Neighborhoods, a comprehensive community development approach combining direct service, community organizing, and collective impact partnership development.

Item:
Finance & Management Committee
March 8, 2016

Subject: JPMorgan Lending and Community Investments within Oakland

Date: February 11, 2016

#### FY 2015-FY 2016

\$300,000 grant to support Jewish Vocational Service's ("JVS") EXCEL Program, which provides comprehensive training and a way out of poverty through placement in high-demand medical administrative, nursing, and personal caregiver roles. This grant will allow JVS to deepen its sector strategy within healthcare and increase their regional impact. Over the last year, JVS has solidified new relationships with employers and training providers in the East Bay (including John Muir and Ohlone College) and the South Bay and on the Peninsula (College of San Mateo and their employer partners).

Additional descriptions of the Bank's engagement within the communities it serves, including Oakland, may be found at the following link: https://www.jpmorganchase.com/corporate/Corporate-Responsibility/global-philanthropy.htm.

Per staff's request, *Table 7* contains data on Community Development Loans and Investments provided by Wells Fargo. Wells Fargo also notes that they provided \$1.6 million through corporate and foundation giving, \$772 thousand in contributions through the annual Team Member Community Support and United Way Campaign, \$126 thousand in matching team member gifts, and performed 3,650 volunteer hours. Wells Fargo team members participated in 41 community development service activities totaling 101 hours.

Table 7
City of Oakland, CA
Wells Fargo – Community Development Loans & Investments

	2014		2013	
	Total Units	Total Amount	Total Units	Total Amount
Community Development Loans	11	\$55.4 million		
Community Development Investments	55	\$1.4 million	11.5	

Per staff's request, *Table 8* contains data on Community Development Loans and Investments provided by Citi.

Table 8
City of Oakland, CA
Citi – Community Development Loans & Investments

	2014		2013	
	Total Units	Total Amount	Total Units	Total Amount
Community Development Loans	2	\$5.3 million	4	\$27.7 million
Community Development Investments	. 34	\$4.7 million	38	\$31.4 million

#### Local Media Outreach

JPMorgan's approach to advertising is a mixture of national and local campaigns. Most of JPMorgan's local advertising is placed at the regional level not by city. Oakland is part of the San Francisco-Oakland-San Jose region. In 2015, JPMorgan placed television advertisements

	Item:
Finance &	Management Committee
	March 8, 2016

Page 11

Subject: JPMorgan Lending and Community Investments within Oakland

Date: February 11, 2016

Page 12

for the full year (30 weeks total), and the plan for 2016 is the same. JPMorgan's consumer banking line of business also does some advertising on Chinese language television and print media in the region. Chase Business Banking ran local radio ads throughout the year as well.

#### Race and Ethnicity Data

JPMorgan notes that, given restrictions under Federal law (Equal Credit Opportunity Act and implementing regulations) relative to the information that creditors may require and collect in connection with certain consumer and small business lending transactions, data reflecting the race and ethnicity of borrowers is based upon voluntary disclosures of such information by applicants, or, in the case of in-person applications, upon visual observation, if not otherwise provided by the applicant. Therefore, JPMorgan does not require that applicants provide the types of demographic detail that the City seeks.

Other than information that is subject to the reporting requirements of mortgage-related transactions under Federal law (HMDA) and business loans guaranteed by the Small Business Administration, per JPMorgan, the Bank does not ask applicants to voluntarily provide such information (except in limited "special purpose" credit transactions). Accordingly, except where required for public reporting purposes, and subject to the limitations above, this data is not captured nor requested by JPMorgan.

#### Continuing Efforts by JPMorgan

As part of JPMorgan's efforts to better serve Oakland, a team from JPMorgan toured Oakland with City staff on December 8, 2015. The team included JPMorgan representatives from the Government Relations, Credit Underwriting, Retail Branch Area Management, Retail Real Estate, Media Relations, and Corporate Responsibility groups among others. The City was represented by staff from the Treasury Bureau, Mayor's Office, Housing and Community Development, Economic and Workforce Development, Council Member Larry Reid's Office as well as project managers for the East Oakland and West Oakland and Downtown Projects. As a result of the tour, JPMorgan and City staff (a.k.a. the Community Outreach Team) have agreed to meet regularly in order to continue exploring potential branch locations, new investments, and affordable housing projects.

#### Next Steps for the City

The Treasury Bureau, Department of Housing and Community Development, and Office of the City Attorney, will work to update the requirements of the Linked Banking Ordinance (the "Ordinance") to clearly articulate the data and information reporting requirements as dictated by the City Council. Compliance with the reporting requirements is used to determine whether or not a bank is an Eligible Depository under the Ordinance. Staff would like to complete amendments to the Ordinance by June 2016. By July 2016, staff intends to issue a request for proposals for banking services. Any bank to be considered must be deemed an Eligible Depository under the Ordinance.

#### FISCAL IMPACT

There are no budgetary implications associated with this informational report.

Item:
Finance & Management Committee
March 8, 2016

Subject: JPMorgan Lending and Community Investments within Oakland

Date: February 11, 2016

Page 13

#### **PUBLIC OUTREACH / INTEREST**

This item did not require any additional public outreach other than the required posting on the City's website.

#### COORDINATION

This report has been prepared by the Treasury Bureau in coordination with the Department of Housing and Community Development and Office of the City Attorney.

#### **SUSTAINABLE OPPORTUNITIES**

**Economic:** This informational report provides data to aid the City in its continued efforts to promote greater economic opportunity and social equity in Oakland.

**Environmental:** There are no environmental opportunities associated with this informational report.

**Social Equity:** This informational report provides data to aid the City in its continued efforts to promote greater economic opportunity and social equity in Oakland.

Page 14

#### ACTION REQUESTED OF THE CITY COUNCIL

Staff requests that the City Council accept this informational report on community and economic investments made by Chase Bank in Oakland since they received the City of Oakland's banking contract in 2014 and data analysis on foreclosures between 2007 and 2015.

For questions regarding this report, please contact Katano Kasaine, Treasurer, at (510) 238-2989.

Respectfully submitted,

KATANO KASAINE

Treasurer, Treasury Bureau

Reviewed by:

David Jones, Principal Financial Analyst

Prepared by:

Jackie Lee, Financial Analyst

**Treasury Operations** 

#### Attachments (9):

- A: Questions and Answers Provided by JPMorgan
- B: Home Mortgage Loans by Census Tract
- C: Census Tracts and City Council Districts
- D: Home Mortgage Loans by Income Level
- E: Sample FFIEC Home Mortgage Lending Data
- F: Additional Data Provided the Other Lenders
- G: Race and Ethnicity Data Provided by Greenlining
- H: Sample FFIEC Small Business Loans Data
- I: Sample FFIEC Community Development Loan Data

Item: \_\_\_\_\_\_
Finance & Management Committee
March 8, 2016

## Attachment A Additional Data Provided by JPMorgan in Q&A Format

#### JP Morgan Chase Bank Responses to

#### **Questions from City of Oakland**

Date: 02/08/2016

JP Morgan Chase Bank, N.A. (the Bank) has received questions and additional data requests on a number of topics from the City of Oakland (the City), most of which are addressed below. Those questions and data requests that are similar in nature have been grouped together with the Bank's corresponding response. Certain questions and data require further review and the Bank will respond to those as soon as reasonably practicable.

#### Supplemental Data Request

- 1. Request for additional data on low and moderate income mortgage lending and comparison to such activity in other cities
  - a. JPMorgan Chase has a long tradition of market leadership in the area of mortgage lending, offering mortgage products that meet the needs of all homebuyers. During 2013 and 2014 combined, the bank originated or purchased more than 2,100 mortgage loans totaling approximately \$1.1 billion in Oakland, of which, on the basis of the number of loans, 19% totaling \$52 million were made to low- or moderate-income customers and 41% totaling \$449 million were made for homes located in low- or moderate-income communities. The Bank has already provided data for 2013 and 2014 related to low to moderate income (LMI) mortgage lending activity in the City. This information was provided by census tract, as requested by the City.
  - b. The Bank's and other regulated lender's mortgage lending activity in other cities is available at the following website. The City may use this database of publicly available mortgage lending information to conduct its own comparison of the Bank's mortgage lending activity in Oakland with such activity in other cities.

www.ffiec.gov/hmdaadwebreport/DisWelcome.aspx

- 2. Provide additional information on the Bank's lending, investments and grants within Oakland as a percentage of profit/revenue. How does this compare to other cities?
  - Annual community development loan data is available in aggregate through reports on the FFIEC CRA website referenced below. The reports include information on the Bank as well as other Financial Institutions covered by law. The Bank does not report the percentage of Community Development loans, investments, and grants as a percentage of profit/revenue and therefore, is not available.
    - a. JPMorgan Chase has distinguished itself as a national leader in community development lending. JPMorgan Chase Bank (JPMCB) provides financing for affordable housing and economic development projects in low- and moderate-income communities served by the bank. In 2013, JPMCB originated or purchased approximately \$71 million in community development loans or letters of credit. For 2014, JPMCB originated or purchased approximately \$92 million in community development loans or letters in the City of Oakland, CA, for a two year total of approximately \$163 million.
    - b. JPMorgan Chase has continued to maintain excellent responsiveness to the community development needs of its assessment area through its significant level of qualified community development investments. JPMCB makes substantial investments in Low-Income Housing Tax Credits (LIHTC) which help finance the creation of low- or moderate-income affordable housing and in New Markets Tax Credits (NMTC) which help provide community services and revitalization/stabilization to low- or moderate-income communities. In 2013, JPMCB made approximately \$9 million in new qualified investments in the City of Oakland, CA. For 2014, JPMCB originated approximately \$5 million in qualified investments, for a two year total of \$14 million.
    - c. JPMorgan Chase has long supported economic development, affordable housing, support services, education, and other community development initiatives by providing grants to not-for-profit organizations and financial intermediaries devoted to these areas. In addition, the bank has been a leader in designing and fostering innovative programs to meet the changing needs of its communities. During this period, JPMCB provided \$670,000 million in grants to nonprofit, civic, and philanthropic organizations for community development purposes in the City of Oakland, CA in 2013, and another \$300,000 in 2014.
    - d. Aggregate annual community development loan data is available by bank through reports located on the following website.

http://www.ffiec.gov/craadweb/DisRptMain.aspx

- 3. Provide additional information on loan interest rates as well as application and acceptance rates for minorities for mortgage banking, small business lending and women owned businesses
  - a. Interest rates are updated daily and intra-day to reflect conditions and trends in the financial market to give the customer the most current purchase rates when choosing a home loan. The customer can use our mortgage calculator to get a customized estimate of one's mortgage rate and monthly payment. The customer can contact a Chase Mortgage Banker when he/she is ready to get started.
  - b. All costs associated with a loan are disclosed to a customer prior to loan closing. The Bank does not disclose interest rates on individual loans. Current market rates on loans like auto and home are disclosed on the Bank's website.
    - i. https://www.chase.com/mortgage
    - ii. https://www.chase.com/auto-loans/compare-rates
  - c. The following link provides additional explanation on interest rates:
    - i. https://www.chase.com/news/121115-sketched-interest-rates
  - d. Please note that, given restrictions under federal law (Equal Credit Opportunity Act and implementing regulations) relative to the information that creditors may require and collect in connection with certain consumer and small business lending transactions, data reflecting the race and ethnicity of borrowers is based upon voluntary disclosures of such information by applicants, or, in the case of inperson applications, upon visual observation, if not otherwise provided by the applicant.
  - e. As stated above, creditors may not require that applicants provide the types of demographic detail that the City seeks. Other than information that is subject to the reporting requirements of mortgage-related transactions under federal law (Home Mortgage Disclosure Act), and business loans guaranteed by the Small Business Administration, the Bank cannot even ask applicants to voluntarily provide such information (except in limited "special purpose" credit transactions). Accordingly, except where required for public reporting purposes, and subject to the limitations above, this data is not captured nor requested by the Bank.
  - f. Chase is a leader in SBA lending. Chase has consistently been one of the nation's top SBA lenders in loan units according to the U.S. Small Business Administration's reporting.
  - g. Mortgage banking application and acceptance rate data for minorities is in the process of being gathered and assembled.

- 4. Request to determine if Chase has been fined for consumer-unfriendly practices
  - a. Mortgage and Foreclosure Practices: The financial crisis resulted in unprecedented levels of delinquencies and defaults of 1–4 family residential real estate loans. Such loans required varying degrees of loss mitigation activities. Foreclosure is usually a last resort, and accordingly, the bank has made, and continues to make, significant efforts to help customers remain in their homes. Chase has entered into various Consent Orders and settlements with federal and state governmental agencies and private parties related to mortgage servicing, origination, and residential mortgage-backed securities activities. The requirements of these Consent Orders and settlements vary, but in the aggregate, include cash compensatory payments (in addition to fines) and/or "consumer relief," which may include principal reduction, refinancing, short sale assistance, and other specified types of consumer relief. Other obligations required under certain Consent Orders and settlements, as well as under new regulatory requirements, include enhanced mortgage servicing and foreclosure standards and processes.
    - i. The mortgage servicing Consent Orders and settlements are subject to ongoing oversight by the Mortgage Compliance Committee of the Firm's Board of Directors. In addition, certain of the Consent Orders and settlements are the subject of ongoing reporting to various regulators and independent overseers. Since the entry of these orders, we have made significant enhancements to our servicing and default business and committed considerable resources against improving the customer experience and providing mortgage relief to consumers. We are committed to fulfilling all of these commitments with appropriate due diligence and oversight.
    - ii. In January 2016, the OCC lifted the Mortgage Banking Consent Order which is a significant milestone.
  - b. Sworn Documents/Collections Litigation: Deficiencies associated with sworn documents and collections litigation were identified by Chase. During 2011, debt collection litigation was suspended. Policies and controls have been and continue to be considered and documented, consistent with consent orders, as well as agreements entered with states, including California.
  - c. Add-on Practices: The Bank recognized issues with the sales and fulfillment of certain Add-On Products (including Debt Cancellation) that resulted in a full exit of these products and reimbursement to certain customers. The Bank entered into

- Consent Orders with the OCC and CFPB in September 2012, which were lifted by the regulators noting Chase's fulfillment of all obligations thereunder."
- d. Debt Sales: In mid-2012, Chase ceased selling charged-off consumer debt. Policies and controls are being considered and implemented with respect to any potential future charged-off consumer debt sale practices consistent with consent order and regulatory expectations. No restart date, if any, has been set.
- 5. Request for additional data on foreclosures by race, ethnicity and by census tract
  - a. The Bank does not report this information and it is not available for public disclosure.
- 6. Provide definition for Low and Moderate Income

The following definitions are used by the Bank in categorizing income levels and are consistent with the descriptions of such levels under the Community Reinvestment Act (CRA), the Home Mortgage Disclosure Act (HMDA) and implementing regulations. The following levels are provided on both an income level for individuals as well as for "geography" which refers to a census tract. So, for example, in the "low-income" definition, an individual's income will be considered "low-income" if that income is less than 50 percent of the median income of the subject statistical metropolitan area (here, the Oakland SMA), and a census tract (the "geography") within the Oakland SMA will be considered low-income if the median family income in that census tract is less than 50 percent of the median family income of the Oakland SMA:

- a. <u>Low- income</u> an individual income that is less than 50 percent of the area median income or a median family income that is less than 50 percent, in the case of geography
- b. Moderate-income an 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 and less than 80 percent, in the case of geography
- c. <u>Middle- income</u> an individual income that is at least 80 percent and less than 120 percent of the are median income, or a median family income that is at least 80 and less than 120 percent, in the case of geography
- d. <u>Upper-income</u> an individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more, in the case of geography

7. Request for improved services in under-represented communities — Oakland and other cites. Outline improving access to banking services in Oakland. List of projects that create opportunity for low- income residents. Describe partnership and sponsorship expansion with non-profits. Describe how Chase is going further than OBDC with other partnerships.

Our corporate responsibility work is focused on supporting economic expansion and progress in our communities and working with local leaders to help develop strategies to bolster the long-term vitality of the world's cities. We are investing in workforce skills, supporting small businesses and expanding the global financial capabilities of consumers.

In Oakland, we are engaged in many initiatives. Included but not limited to the following:

- Our \$2.1million grant to the CDFI Collaborative of Northern California Community Loan Fund and OBDC Small Business Finance will support economic development, small business growth, and affordable housing along the International Boulevard commercial corridor in Oakland where a bus rapid transit line is being built. NCCLF and OBDC will coordinate a multi-lender commercial corridor financing initiative that will provide a comprehensive set of products and services to support economic development projects, small business growth, and affordable housing development. (FY2015)
- II. Our \$2.6 million grant supporting an innovative partnership between Opportunity Fund, Craft3, and Lending Club which will deploy \$10M in new loans to 400 low and moderate-income small business owners, ultimately closing the financing gap, providing access to affordable capital, and promoting job retention and creation. The fund will serve LMI small business owners in high poverty areas in Oakland, Los Angeles, San Diego, San Francisco, Portland and Seattle. (FY2015)
- III. Our \$300,000 grant supports Jewish Vocational Service's EXCEL Program, which provides comprehensive training and a way out of poverty through placement in high-demand medical administrative, nursing and personal caregiver roles. This grant will allow JVS to deepen its sector strategy within healthcare and increase their regional impact. Over the last year, JVS has solidified new relationships with employers and training providers in the East Bay (including John Muir and Ohlone College) and the South Bay and on the Peninsula (College of San Mateo and their employer partners). (FYs 2015-2016)
- IV. Our \$250,000 grant supports the Youth Jobs+ Initiative led by United Way of the Bay Area, a year-round public-private partnership to help young adults find employment in San Francisco and Oakland. The goal in Oakland is, with UWBA's programmatic knowledge, leadership and understanding of best practices in place, to help support the City of Oakland's goal to provide 1,850 youth with work experience, and directly place 100 youth in internships, entry-level jobs and other work-based learning opportunities over the summer. (FY2015)
- V. Our grants totaling \$1.75 million provide continued support to the LaunchPath Work-Based Learning Employer Engagement Project, an innovative project connecting employers, educators, and students to close the skills gap and strengthen the workforce. The most recent grant of \$200,000 for the Bay Area Employer Engagement Project will enable them to facilitate a one-year regional initiative with thirteen East Bay Community Colleges to broker internships on the LaunchPath platform. (FYs 2013-2015)

- VI. Our \$150,000 grant supports the Bay Area Workforce Funding Collaborative's ongoing efforts to build the workforce training capacity of Bay Area community colleges and to strengthen the region's workforce training system. Two of the four current community college recipients are in the East Bay: Merritt's Allied Health Program and Laney's Bio-Manufacturing Program. (FY2015)
- VII. Our \$150,000 grant supports the Unity Council's job training programs for low-income individuals of Alameda County in allied healthcare, technology and the building trades. Additionally, the firm sponsors the Annual Día de los Muertos festival which draws more than 50,000 community residents to the Fruitvale District. (FY2015)
- VIII. JPMorgan Chase is the lead California sponsor of College Track, an Oakland based organization that empowers students from underserved communities to graduate from college. The firm has contributed more than \$2.2 million grant to expand College Track's services and serve more students in its five California Centers in Oakland, Bayview Hunters Point (SF), East Palo Alto, Boyle Heights (LA) and Sacramento. (FYs 2012-2015)
- IX. Our \$100,000 grant to Oakland-based OBDC Small Business Finance supports their efforts creating economic opportunity by empowering entrepreneurs with a focus on veterans and Oakland businesses affected by the BRT line expansion. Through innovative partnerships, OBDC provides business owners with capital, education, and relationships. Their approach helps borrowers create jobs and stimulate economic development in low-to-moderate income communities. (FY2015)
- X. Our \$100,000 grant to Inner City Advisors provides support for the identification and investment in high-impact entrepreneurs committed to scaling their businesses and creating good jobs for a diverse workforce. (FY2015)
- XI. Our \$75,000 grant to East Bay Asian Local Development Corporation (EBALDC) supports Healthy Neighborhoods, a comprehensive community development approach combining direct service, community organizing, and collective impact partnership development. (FY2015)
- XII. Additional descriptions of the Bank's engagement within the communities it serves, including the City, may be found at the following link:

https://www.jpmorganchase.com/corporate/Corporate-Responsibility/global-philanthropy.htm

#### 8. Details surrounding branch closure – support to East Oaklanders

- a. The closure of the International Boulevard, Oakland branch in October 2015 is part of a national branch consolidation strategy. We announced last February a plan to reduce branches nationwide by about 300 by the end of 2016. These reductions are resulting from changing consumer behavior. Branch transaction volumes are declining as customers increase their use of and other remote channels (such as mobile apps and Chase.com). These changes are occurring across the financial services industry. We continually review our branch network and make adjustments as needed based on the changing market and banking habits of our customers.
- b. To ensure the least disruption possible when closing branches, we consider the proximity of other branches when assessing a branch for closure. We have two branches less than one

- mile from the referenced International Boulevard branch, for example. These branches are able to serve the customers who previously banked at the International Boulevard branch and customers can of course bank online at Chase.com or via the Chase Mobile App.
- c. More generally, our branch commitment to Oakland has not wavered since 2008: we acquired 8 Oakland branches in the Washington Mutual (WaMu) transaction and today have 9 branches.
- 9. Discuss local media outreach and strategic partnership
  - a. The Bank's approach to advertising is a mixture of national and local campaigns. Most of the Bank's local advertising is placed at the regional level. Oakland is part of the San Francisco-Oakland-San Jose region. In 2015, the Bank placed TV ads for the full year (30 weeks total), and the plan for 2016 is the same. The Bank's consumer banking line of business also does some advertising on Chinese language TV and print media in the region. Chase Business Banking ran local radio ads throughout the year as well.
- 10. Provide number of overdraft and other fees to Oaklanders/low-income Oaklanders. Discuss Chase's practices.
  - a. Chase's retail deposit product fees, including overdraft fees where applicable, are nationally set; no regional pricing exists. These fees are disclosed at account opening and presented in a format consistent with The Pew Charitable Trusts' model disclosures to give customers a description of fees and details about when deposits are available in an easy-to-read format.
  - b. In 2013, JPMorgan Chase joined with the Cities for Financial Empowerment (CFE) to announce the creation of Bank On 2.0, a unified, national approach to deliver affordable banking products and services to low-income and under-banked individuals through municipal programs. Chase participated in the initial meeting with the City of Oakland in 2015 where the city provided an update on the National Bank On 2.0 program. Chase is proud to offer a retail deposit product that incurs no overdraft fees at all: the Chase Liquid® reloadable prepaid card product offering that meets the Bank On national standards.
- 11. Provide list of projects that create opportunities for low-income Oaklanders, specifically related to Affordable Housing
  - a. We provided \$21 million of construction financing and \$9.5 million of permanent financing for **Cathedral Gardens**, a 100-unit apartment complex servicing low-income families in downtown Oakland.
    - The property was built on the former site of St. Francis de Sales Cathedral. The project was completed in March 2015. The address is 668 21<sup>st</sup> Street.

- b. We provided \$8 million of construction financing and \$6 million of permanent financing for **AveVista**, a 68-unit apartment complex serving low-income families in downtown Oakland.
  - The development is comprised of a five-story building with an interior courtyard and 3,000 square feet of retail space. The project was completed last spring.
     The address is 460 Grand Ave.
- c. The Bank also worked on a NMTC transaction supporting the Vincent Academy Charter School in West Oakland. This transaction closed on 11/20/2014.

	·	

#### Attachment B Home Mortgage Loans by Census Tract

#### City of Oakland JPMorgan Chase - HMDA Loans

	2014						
Census Tract	Income Level*	Total Loan Units	Total Loan Amount \$(000s)				
4001.00	Upper						
4002.00	Upper	7	\$5,973				
4003.00	Middle	15	\$9,628				
4004.00	Middle	5	\$2,279				
4005.00	Moderate	5	\$3,302				
4006.00	Moderate	4	\$1,564				
4007.00	Moderate						
4008.00	Moderate						
4009.00	Moderate						
4010.00	Moderate						
4011.00	Moderate	12	\$9,383				
4012.00	Middle	7	\$4,340				
4013.00	Low	3	\$6,153				
4014.00	Low	6	\$2,925				
4015.00	Low						
4016.00	Moderate						
4017.00	Moderate	9	\$3,423				
4018.00	Low	1	\$246				
4022.00	Moderate	4	\$1,123				
4024.00	Low	3	\$2,415				
4025.00	Low						
4026.00	Low	1	\$545				
4027.00	Moderate	2	\$901				
4028.00	Low	2	\$2,302				
4029.00	Low	1	\$7,090				
4030.00	Low	2	\$522				
4031.00	Moderate	4	\$1,249				
4033.00	Moderate	8	\$2,798				
4034.00	Moderate	4	\$6,498				
4035.01	Low	7	\$5,889				
4035.02	Middle	3	\$2,707				
4036.00	Moderate	12	\$15,623				
4037.01	Middle	11	\$15,913				
4037.02	Moderate	14	\$13,568				
4038.00	Upper	13	\$11,086				
4039.00	Middle	13	\$5,407				

2013						
Census Tract	Income Level*	Total Loan Units	Total Loan Amount \$(000s)			
4001.00	Upper					
4002.00	Upper	13	\$6,516			
4003.00	Middle	32	\$15,706			
4004.00	Middle	24	\$13,177			
4005.00	Moderate	18	\$6,416			
4006.00	Moderate	6	\$2,098			
4007.00	Moderate					
4008.00	Moderate					
4009.00	Moderate	***************************************				
4010.00	Moderate					
4011.00	Moderate	17	\$10,220			
4012.00	Middle	9	\$3,082			
4013.00	Low	7	\$6,544			
4014.00	Low	11	\$3,370			
4015.00	Low		17777771			
4016.00	Moderate	1	\$221			
4017.00	Moderate	14	\$3,889			
4018.00	Low	3	\$759			
4022.00	Moderate	6	\$1,493			
4024.00	Low	3	\$1,220			
4025.00	Low	2	\$484			
4026.00	Low	1	\$267			
4027.00	Moderate	2	\$3,017			
4028.00	Low	3	\$1,964			
4029.00	Low	1	\$306			
4030.00	Low	2	\$420			
4031.00	Moderate	8	\$2,218			
4033.00	Moderate	10	\$2,530			
4034.00	Moderate	9	\$8,564			
4035.01	Low	20	\$19,132			
4035.02	Middle	7	\$6,411			
4036.00	Moderate	22	\$23,647			
4037.01	Middle	8	\$8,116			
4037.02	Moderate	5	\$2,643			
4038.00	Upper	15	\$11,519			
4039.00	Middle	23	\$14,870			

	20	)14	
		Total	Total Loan
Census	Income	Loan	Amount
Tract	Level*	Units	\$(000s)
4040.00	Middle	16	\$8,931
4041.01	Upper	10	\$5,281
4041.02	Moderate	6	\$2,341
4042.00	Upper	12	\$9,711
4043.00	Upper	15	\$10,704
4044.00	Upper	31	\$21,342
4045.01	Upper	6	\$3,535
4045.02	Upper	32	\$19,416
4046.00	Upper	17	\$9,856
4047.00	Upper	7	\$3,401
4048.00	Upper	12	\$4,400
4049.00	Moderate	21	\$10,325
4050.00	Upper	22	\$11,746
4051.00	Upper	13	\$9,121
4052.00	Moderate	12	\$10,067
4053.01	Moderate	11	\$17,507
4053.02	Low	3	\$6,707
4054.01	Low	6	\$3,889
4054.02	Moderate	2	\$1,164
4055.00	Moderate	7	\$4,173
4056.00	Moderate	13	\$7,111
4057.00	Moderate	2	\$951
4058.00	Low	6	\$5,424
4059.01	Low	1	\$294
4059.02	Low	1	\$238
4060.00	Low		
4061.00	Moderate	3	\$4,862
4062.01	Low	4	\$2,120
4062.02	Low	3	\$1,033
4063.00	Low	2	\$1,500
4064.00	Low	4	\$1,012
4065.00	Low	13	\$8,579
4066.01	Moderate	10	\$4,402
4066.02	Low	4	\$2,339
4067.00	Middle	29	\$12,103
4068.00	Middle	14	\$5,758
4069.00	Middle	14	\$6,621
4070.00	Low	14	\$6,973
4071.01	Low	3	\$1,473
4071.02	Moderate	2	\$585
4072.00	Low	2	\$1,175 ·
4073.00	Low		

	20	013	
		Total	Total Loan
Census	Income	Loan	Amount
Tract	Level*	Units	\$(000s)
4040.00	Middle	14	\$5,601
4041.01	Upper	20	\$6,030
4041.02	Moderate	8	\$11,360
4042.00	Upper	33	\$17,170
4043.00	Upper	26	\$17,608
4044.00	Upper	50	\$22,475
4045.01	Upper	12	\$6,665
4045.02	Upper	62	\$29,413
4046.00	Upper	36	\$17,064
4047.00	Upper	11	\$5,572
4048.00	Upper	14	\$8,680
4049.00	Moderate	30	\$13,870
4050.00	Upper	35	\$14,977
4051.00	Upper	34	\$17,865
4052.00	Moderate	18	\$7,688
4053.01	Moderate	6	\$4,535
4053.02	Low	5	\$6,841
4054.01	Low	5	\$2,081
4054.02	Moderate	2	\$654
4055.00	Moderate	9	\$7,204
4056.00	Moderate	8	\$5,123
4057.00	Moderate	17	\$9,132
4058.00	Low	11	\$2,345
4059.01	Low	5	\$1,846
4059.02	Low	3	\$674
4060.00	Low		
4061.00	Moderate	4	\$1,201
4062.01	Low	4	\$1,568
4062.02	Low	3	\$1,319
4063.00	Low	2	\$234
4064.00	Low	4	\$1,462
4065.00	Low	8	\$2,059
4066.01	Moderate	12	\$3,785
4066.02	Low	5	\$1,884
4067.00	Middle	46	\$19,172
4068.00	Middle	17	\$5,297
4069.00	Middle	19	\$7,177
4070.00	Low	19	\$4,287
4071.01	Low	6	\$1,267
4071.02	Moderate	8	\$4,905
4072.00	Low	5	\$920
4073.00	Low	2	\$326

	2014					
		Total	Total Loan			
Census Tract	Income Level*	Loan Units	Amount \$(000s)			
4074.00	Low	2	\$773			
4075.00	Low	1	\$1			
4076.00	Low	8	\$2,351			
4077.00	Middle	12	\$3,834			
4078.00	Moderate	4	\$1,203			
4079.00	Middle	17	\$6,909			
4080.00	Upper	9	\$4,168			
4081.00	Upper	37	\$16,488			
4082.00	Middle	13	\$4,196			
4083.00	Moderate	22	\$5,851			
4084.00	Low					
4085.00	Low					
4086.00	Low	4	\$922			
4087.00	Low	6	\$1,617			
4088.00	Low	2	\$281			
4089.00	Low	2	\$444			
4090.00	Low	1	\$177			
4091.00	Moderate	1	\$139			
4092.00	Low	1	\$279			
4093.00	Low	5	\$933			
4094.00	Low	1	\$115			
4095.00	Low	1	\$284			
4096.00	Low	1	\$187			
4097.00	Low	4	\$990			
4098.00	Middle	11	\$3,429			
4099.00	Upper	10	\$3,178			
4100.00	Middle	7	\$2,642			
4101.00	Low	7	\$4,270			
4102.00	Low	2	\$378			
4103.00	Low	3	\$462			
4104.00	Moderate	3	\$264			
4105.00	Low	1	\$199			
9820.00	Middle	1	\$374			
9832.00	Upper	6	\$3,010			
Total		788	\$463,370			

2013				
Census Tract	Income Level*	Total Loan Units	Total Loan Amount \$(000s)	
4074.00	Low	7	\$1,753	
4075.00	Low	2	\$582	
4076.00	Low	16	\$4,743	
4077.00	Middle	28	\$9,090	
4078.00	Moderate	13	\$3,839	
4079.00	Middle	18	\$6,689	
4080.00	Upper	18	\$7,044	
4081.00	Upper	33	\$13,608	
4082.00	Middle	15	\$6,343	
4083.00	Moderate	21	\$5,547	
4084.00	Low	7	\$985	
4085.00	Low	6	\$2,168	
4086.00	Low	6	\$1,066	
4087.00	Low	12	\$1,607	
4088.00	Low	3	\$496	
4089.00	Low	2	\$193	
4090.00	Low	1	\$148	
4091.00	Moderate	2	\$238	
4092.00	Low	4	\$434	
4093.00	Low	2	\$450	
4094.00	Low	4	\$876	
4095.00	Low	2	\$272	
4096.00	Low	3	\$576	
4097.00	Low	8	\$2,510	
4098.00	Middle	13	\$3,240	
4099.00	Upper	18	\$5,778	
4100.00	Middle	17	\$5,229	
4101.00	Low	7	\$1,858	
4102.00	Low	8	\$850	
4103.00	Low	4	\$532	
4104.00	Moderate	5	\$908	
4105.00	Low	3	\$770	
9820.00	Middle	2	\$4,479	
9832.00	Upper	4	\$1,480	
Total		1,254	\$576,536	

<sup>\*</sup>Income characteristics calculated per Oakland-Hayward-Berkeley, CA MD (MSA 36084)

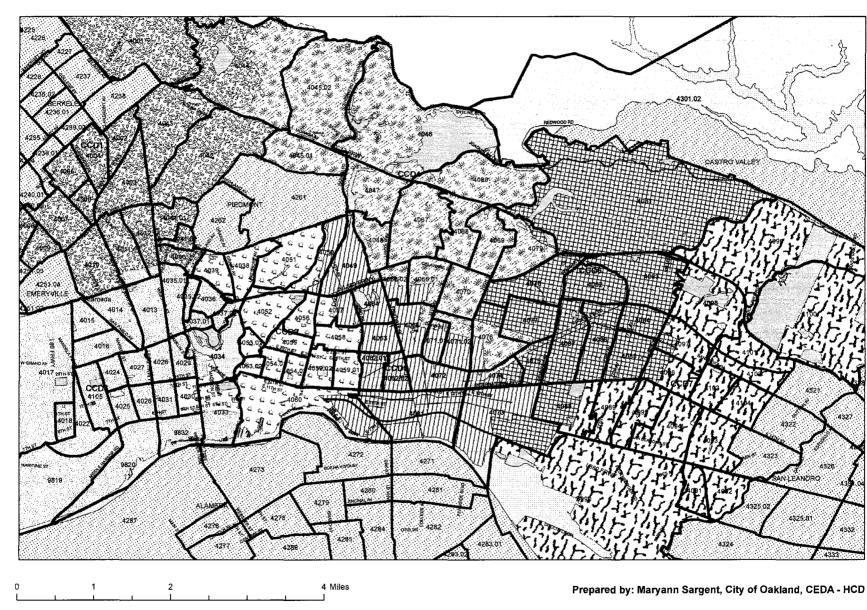
### Attachment C Census Tracts and City Council Districts

#### City of Oakland

**Council District** 

Piedmont

NAME CCD1 CCD2



### Attachment D Home Mortgage Loans by Income Level

#### City of Oakland JPMorgan Chase - HMDA Loans

					2014	
Income Level*	Median Family Income*	Total No. of Census Tracts	Total Loan Units	% of Loan Units	Total Loan Amount \$(000s)	% of Loan Amount
Low	< 50% of MSA median family income	47	144	18%	\$85,506	18%
Moderate	> 50% and < 80% of MSA median family income	31	197	25%	\$130,377	28%
Middle	> 80% and < 120% of MSA median family income	16	188	24%	\$95,071	21%
Upper	> 120% of MSA median family income	18	259	33%	\$152,416	33%
City Total		112	788		\$463,370	

	Median Family Income*			2013		
Income Level*		Total No. of Census Tracts	Total Loan Units	% of Loan Units	Total Loan Amount \$(000s)	% of Loan Amount
Low	< 50% of MSA median family income	47	247	20%	\$86,448	15%
Moderate	> 50% and < 80% of MSA median family income	31	281	22%	\$146,945	25%
Middle	> 80% and < 120% of MSA median family income	16	292	23%	\$133,679	23%
Upper	> 120% of MSA median family income	18	434	35%	\$209,464	36%
City Total		112	1,254		\$576,536	_

<sup>\*</sup>Income characteristics calculated per Oakland-Hayward-Berkeley, CA MD (MSA 36084)

#### Attachment E Sample FFIEC Home Mortgage Lending Data

INSTITUTION: 0000852218 - 9 JPMORGAN CHASE BANK, NA

NCOME, RACE AND ETHNICITY		cations ved 20/	Loa Origir		Apps. App Not Acc		Applica Den		Applica Withd		Files Clo Incompl	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
ESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/ AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	11	1878	7	1024			4	854				
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	10	1903	4	525			6	1378				
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	6	1595	1	115			4	1200	1	280		
ETHNICITY 7/ HISPANIC OR LATINO	5	851	1	200			4	651				
NOT HISPANIC OR LATINO	16	2930	10	1349			6	1581				
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	10	2500	.0	1040			ŭ	1001				
ETHNICITY NOT AVAILABLE 6/	6	1595	1	115			4	1200	1	280		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	5	1052	3	325			2	727				
OTHERS, INCLUDING HISPANIC	16	2729	8	1224			8	1505				
-79% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	2	417	.1	205			1	212				
ASIAN	22	5749	15	4077			4	986	3	686		
BLACK OR AFRICAN AMERICAN	8	1189	6	898	1	127	1	164				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1	246	1	246								
WHITE	31	7921	21	4987			9	2608	1	326		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	7	1722	3	744			4	978				
ETHNICITY 7/												
HISPANIC OR LATINO	10	2211	7	1510			3	701				
NOT HISPANIC OR LATINO	53	13178	35	8418	1	127	13	3621	4	1012		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	8	1855	5	1229			3	626				
MINORITY STATUS 8/ WHITE NON-HISPANIC	21	5579	14	3346			6	1907	1	326		
OTHERS, INCLUDING HISPANIC	42	9592	29	6716	1	127	9	2063	3	686		

INSTITUTION: 0000852218 - 9 JPMORGAN CHASE BANK, NA

INCOME, RACE AND ETHNICITY (CONTINUED)		cations ved 20/	Loa Origir		Apps. App Not Ac		Applica Den		Applic Witho		Files Clo Incompl	osed For leteness
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	222	1	222			_					
ASIAN	18	5904	13	3699			5	2205				
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1	396							1	396	_	
WHITE	24	6743	16	4666			6	1859			2	218
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	8	2718	6	1957							2	761
ETHNICITY 7/ HISPANIC OR LATINO	12	2953	7	1814	•		3	921			2	218
NOT HISPANIC OR LATINO	31	9940	22	6401			8	3143	1	396	-	210
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR	1	372	1	372			Ü	0140	'	000		
LATINO)	'	3/2		3/2								
ETHNICITY NOT AVAILABLE 6/	8	2718	6	1957							2	761
MINORITY STATUS 8/												
WHITE NON-HISPANIC	12	3640	9	2702			3	938				
OTHERS, INCLUDING HISPANIC	32	9625	21	5885			8	3126	1	396	2	218
00-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	261					1	261				
ASIAN	19	8363	13	5561			5	2440	1	362		
BLACK OR AFRICAN AMERICAN	1	515			1	515						
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	2	778	2	778								
WHITE	32	12400	25	9973			5	1952	1	87	1	388
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	8	2412	6	1809					1	345	1	258
ETHNICITY 7/												
HISPANIC OR LATINO	5	1582	3	974			1	220			1	388
NOT HISPANIC OR LATINO	49	20374	36	14977	1	515	10	4433	2	449		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	361	1	361								
ETHNICITY NOT AVAILABLE 6/	8	2412	6	1809					1	345	1	258
MINORITY STATUS 8/	27	10010	22	8000			4	1722	1	07		
WHITE NON-HISPANIC	27	10818	22	8999		545	4	1732		87		200
OTHERS, INCLUDING HISPANIC	28	11499	18	7313	1	515	7	2921	1	362	1	388

INSTITUTION: 0000852218 - 9 JPMORGAN CHASE BANK, NA

MSA/MD: 36084 - OAKLAND-HAYWARD-BERKELEY, CA

INCOME, RACE AND ETHNICITY (CONTINUED)		ications ived 20/	Loa Origir		Apps, App Not Ac		Applica Den		Applio Witho		Files Clo Incompl	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN				·								
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	3	939	1	355			2	584				
ASIAN	232	161672	167	113408			43	33095	16	10539	6	4630
BLACK OR AFRICAN AMERICAN	7	3735	4	2497			2	720	1	518		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	4	2947	2	1331			2	1616				
WHITE	336	247260	259	196351	2	1844	56	36060	11	7574	8	5431
2 OR MORE MINORITY RACES	2	1268					1	947			1	321
JOINT (WHITE/MINORITY RACE)	39	25862	25	16255	1	672	9	5227	4	3708		
RACE NOT AVAILABLE 6/	124	97733	95	74287	1	950	15	12203	5	3611	8	6682
ETHNICITY 7/												
HISPANIC OR LATINO	15	7257	11	6003			3	1171			1	83
NOT HISPANIC OR LATINO	610	441148	450	327602	3	2516	110	76367	33	24320	14	10343
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	11	7311	7	4218			3	2113			1	980
ETHNICITY NOT AVAILABLE 6/	111	85700	85	66661	1	950	14	10801	4	1630	7	5658
MINORITY STATUS 8/												
WHITE NON-HISPANIC	313	234965	243	187373	2	1844	51	33806	11	7574	6	4368
OTHERS, INCLUDING HISPANIC	310	209221	215	142977	1	672	64	44793	21	14765	9	6014
TOTAL 14/	982	624378	710	459966	6	4108	189	110074	48	31541	29	18689

Report Date: 05/21/2015

INSTITUTION: 0000451965 - 9 WELLS FARGO BANK, NA

INCOME, RACE AND ETHNICITY		cations ved 20/	Loa Origin		Apps, App Not Acc		Applica Den		Applic Withd		Files Clo Incomple	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN	-											
RACE 5/ AMERICAN INDIAN/ALASKA NATIVE	1	156	1	156								
ASIAN	22	5132	12	1997			7	2637	2	293	1	205
BLACK OR AFRICAN AMERICAN	11	2380	1	6	2	1070	8	1304	2	293	,	203
NATIVE HAWAIIAN/OTHER PACIFIC ISLND		2000	,	· ·	2	1010	O	1504				
WHITE	33	5667	15	2170			14	2989	4	508		
2 OR MORE MINORITY RACES	33	3007	13	2110			14	2303	7	500		
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	4	700	1	188			2	367	1	145		
TACE NOT AVAILABLE 0/	7	700	ļ	100			2	307	ļ	143		
ETHNICITY 7/ HISPANIC OR LATINO	20	3151	10	1405			8	1568	2	178		
NOT HISPANIC OR LATINO	45	9573	19	2924	1	720	20	5101	4	623	1	205
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	6	1311	1	188	1	350	3	628	1	145		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	15	2807	6	921			7	1556	2	330		
OTHERS, INCLUDING HISPANIC	52	10528	23	3408	2	1070	22	5374	4	471	1	205
60-79% OF MSA/MD MEDIAN				****								
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	4	492	2	331			1	7	1	154		
ASIAN	63	16271	38	9535	1	392	13	3793	11	2551		
BLACK OR AFRICAN AMERICAN	18	3569	11	2282	1	120	2	204	4	963		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	2	403	2	403								
WHITE	94	21514	69	15288			17	4134	8	2092		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1	476					1	476				
RACE NOT AVAILABLE 6/	21	4760	9	1901			7	1906	5	953		
ETHNICITY 7/												
HISPANIC OR LATINO	42	9035	30	6445			8	1632	4	958		
NOT HISPANIC OR LATINO	140	33652	90	20982	2	512	27	7258	21	4900		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2	412	2	412								
ETHNICITY NOT AVAILABLE 6/	19	4386	9	1901			6	1630	4	855		
MINORITY STATUS 8/	54	4007		0004			44	0705	-	4000		
WHITE NON-HISPANIC	54	12674	38	8601	_		11	2785	5	1288		
OTHERS, INCLUDING HISPANIC	129	30327	84	19238	2	512	24	6105	19	4472		

INSTITUTION: 0000451965 - 9 WELLS FARGO BANK, NA

NCOME, RACE AND ETHNICITY (CONTINUED)		cations ved 20/	Loa Origir		Apps. App Not Acc		Applica Den			ations drawn	Files Clo Incomple	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
0-99% OF MSA/MD MEDIAN												
RACE 5/ AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	67	20419	44	13070			13	4753	10	2596		
BLACK OR AFRICAN AMERICAN	12	2890	6	1812			2	287	4	791		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	94	27908	63	19037	3	635	10	2620	17	5368	1	24
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	3	1135	1	260			1	415	1	460		
RACE NOT AVAILABLE 6/	17	5194	11	3418			4	1409	2	367		
ETHNICITY 7/ HISPANIC OR LATINO	27	6860	16	4290	2	626	4	860	4	836	1	24
NOT HISPANIC OR LATINO	150	45437	97	29506	1	9	23	7536	29	8386		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2	616	2	616								
ETHNICITY NOT AVAILABLE 6/	14	4633	10	3185			3	1088	1	360		
MINORITY STATUS 8/ WHITE NON-HISPANIC	65	20442	45	14131	1	9	6	1770	13	4532		
OTHERS, INCLUDING HISPANIC	111	31920	69	20048	2	626	20	6315	19	4683	1	24
0-119% OF MSA/MD MEDIAN  RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	115	44358	76	28147	2	993	20	8410	17	6808		
BLACK OR AFRICAN AMERICAN	9	2668	3	1219			3	561	3	888		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	4	873	4	873								
WHITE	105	36377	79	27763			12	3866	14	4748		
2 OR MORE MINORITY RACES	1	359	1	359								
JOINT (WHITE/MINORITY RACE)	2	789	1	296			1	493				
RACE NOT AVAILABLE 6/	15	5065	9	3327			6	1738				
ETHNICITY 7/ HISPANIC OR LATINO	23	7059	16	4819			5	1450	2	790		
NOT HISPANIC OR LATINO	207	75887	143	51780	2	993	30	11460	32	11654		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	5	2010	5	2010	. 4	550	00	11700	Ű.	1,004		
ETHNICITY NOT AVAILABLE 6/	16	5533	9	3375			7	2158				
MINORITY STATUS 8/ WHITE NON-HISPANIC	78	27137	59	21124			7	2055	12	3958		
OTHERS, INCLUDING HISPANIC	157	57438	104	37045	2	993	29	10914	22	8486		

INSTITUTION: 0000451965 - 9 WELLS FARGO BANK, NA

### MSA/MD: 36084 - OAKLAND-HAYWARD-BERKELEY, CA

INCOME, RACE AND ETHNICITY (CONTINUED)		lications eived 20/		ans nated	Apps. App Not Ac		Applic Den			cations drawn	Files Clo Incompl	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	3	1705	1	1085			1	560	1	60		
ASIAN	1228	812621	943	628796	9	5994	108	68742	165	107299	3	1790
BLACK OR AFRICAN AMERICAN	35	19756	24	14940			7	3334	3	1189	1	293
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	11	6495	9	5404			2	1091				
WHITE	1066	722582	848	582387	7	3447	80	57147	131	79601		
2 OR MORE MINORITY RACES	5	3594	3	2625			2	969				
JOINT (WHITE/MINORITY RACE)	114	75426	92	63381	2	1160	8	4282	12	6603		
RACE NOT AVAILABLE 6/	198	124777	151	96039	1	1078	18	8637	, 28	19023		
ETHNICITY 7/ HISPANIC OR LATINO	56	27425	46	23335			1	414	9	3676		
NOT HISPANIC OR LATINO	2358	1579604	1840	1248980	16	9122	203	133115	295	186304	4	2083
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	56	38314	42	30579	2	1479	3	1052	9	5204		
ETHNICITY NOT AVAILABLE 6/	190	121613	143	91763	1	1078	19	10181	27	18591		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	975	670425	775	538289	6	2728	77	55963	117	73445		
OTHERS, INCLUDING HISPANIC	1483	967712	1143	757100	12	7873	130	79707	194	120949	4	2083
TOTAL 14/	3548	2071822	2654	1599966	29	15539	392	196775	467	257006	6	2536

Report Date: 05/21/2015

INSTITUTION: 0000480228 - 9 BANK OF AMERICA, N.A.

INCOME, RACE AND ETHNICITY		cations ved 20/	Loa Origin		Apps, App Not Ac		Applica Den		Applic Witho		Files Clo Incompl	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000°s
ESS THAN 50% OF MSA/MD MEDIAN				•								
RACE 5/	4	455		455								
AMERICAN INDIAN/ALASKA NATIVE ASIAN	1 12	155 1947	1 4	155 713			2	044		200		
BLACK OR AFRICAN AMERICAN	12	73	4	/13			6	844	2 1	390 73		
	1	/3							1	/3		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND		00.40	_	405			-	4004				
WHITE	9	2046	1	185			8	1861				
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	4	761					4	761				
ETHNICITY 7/ HISPANIC OR LATINO	4	567	1	155			3	412				
NOT HISPANIC OR LATINO	17	2968	5	898			10	1680	2	390		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR	1	271	9	050			1	271	2	390		
LATINO) ETHNICITY NOT AVAILABLE 6/	5	1176					4	1103	1	73		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	5	1021	1	185			4	836				
OTHERS, INCLUDING HISPANIC	18	2858	5	868			10	1527	3	463		
D-79% OF MSA/MD MEDIAN	· · ·											
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	251					1	251				
ASIAN	68	18002	43	12171	6	1255	14	3391	5	1185		
BLACK OR AFRICAN AMERICAN	4	725	2	319			1	166	1	240		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	34	7621	22	5028	3	614	7	1509	2	470		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1	256	1	256								
RACE NOT AVAILABLE 6/	9	2692	2	520	2	479	5	1693				
ETHNICITY 7/												
HISPANIC OR LATINO	18	4249	10	2571	2	498	6	1180				
NOT HISPANIC OR LATINO	91	22934	59	15503	6	1255	18	4281	8	1895		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)					-				-			
ETHNICITY NOT AVAILABLE 6/	8	2364	1	220	3	595	4	1549				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	18	4031	13	2837			3	724	2	470		
OTHERS, INCLUDING HISPANIC	90	22852	55	14937	8.	1753	21	4737	6	1425		

INSTITUTION: 0000480228 - 9 BANK OF AMERICA, N.A.

INCOME, RACE AND ETHNICITY (CONTINUED)		cations ved 20/	Loa Origir		Apps, App Not Acc		Applica Den		Applic Withd		Files Clo Incomple	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN												
RACE 5/ AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	50	17560	38	12739	4	1380	3	1781	5	1660		
BLACK OR AFRICAN AMERICAN	2	663	2	663								
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	42	12754	23	6860	4	1264	11	3337	4	1293		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	5	1787	3	819					1	308	1	660
RACE NOT AVAILABLE 6/	4	1032	2	471			1	180			1	381
ETHNICITY 7/ HISPANIC OR LATINO	7	2005	5	1373	1	360	1	272				
NOT HISPANIC OR LATINO	87	29440	59	19157	6	2034	12	4596	9	2993	1	660
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	3	801	2	551	1	250	12	4000	J	2555	,	000
ETHNICITY NOT AVAILABLE 6/	6	1550	2	471			2	430	1	268	1	38
MINORITY STATUS 8/												
WHITE NON-HISPANIC	32	9999	17	5237	2	654	9	2815	4	1293		
OTHERS, INCLUDING HISPANIC	66	22515	49	15844	6	1990	4	2053	6	1968	1	660
00-119% OF MSA/MD MEDIAN												
RACE 5/ AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	62	23468	40	15447	3	1332	12	4393	7	2296		
BLACK OR AFRICAN AMERICAN	5	1023	3	849			2	174				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	39	13738	27	9690	4	1452	1	128	7	2468		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	3	1126	2	550			1	576				
RACE NOT AVAILABLE 6/	5	2279	1	516			3	1425	1	338		
ETHNICITY 7/ HISPANIC OR LATINO	4	1132	1	487	. 1	192	1	128	1	325		
NOT HISPANIC OR LATINO	98	35960	69	25311	5	2276	14	5060	10	3313		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	3	1216	1	400	ŭ	22.0	1 7	0000	2	816		
ETHNICITY NOT AVAILABLE 6/	9	3326	2	854	1	316	4	1508	2	648		
MINORITY STATUS 8/ WHITE NON-HISPANIC	32	11480	26	9203	3	1260			3	1017		
OTHERS, INCLUDING HISPANIC	76	27565	46	17333	4	1524	16	5271	10	3437		

INSTITUTION: 0000480228 - 9 BANK OF AMERICA, N.A.

### MSA/MD: 36084 - OAKLAND-HAYWARD-BERKELEY, CA

NCOME, RACE AND ETHNICITY (CONTINUED)		ications ived 20/	Loa Origir		Apps. App Not Ac		Applica Den		Applic Witho		Files Clo Incompl	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
20% OR MORE OF MSA/MD MEDIAN												
RACE 5/ AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	670	428457	481	305874	47	30982	74	47069	68	44532		
BLACK OR AFRICAN AMERICAN	19	9505	8	4064	3	1534	6	2987	1	455	1	465
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	3	2115	2	1551					1	564		
WHITE	346	242289	243	165962	23	13127	41	34636	37	28101	2	463
2 OR MORE MINORITY RACES	1	642	1	642								
JOINT (WHITE/MINORITY RACE)	39	26608	36	24492	1	916	2	1200				
RACE NOT AVAILABLE 6/	36	22376	24	16187	4	2665	4	1171	3	2199	1	154
ETHNICITY 7/ HISPANIC OR LATINO	23	12723	16	8769	1	227	6	3727				
NOT HISPANIC OR LATINO	1032	682251	738	483215	72	45827	114	79549	106	73197	2	463
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	15	10366	13	8518			2	1848				
ETHNICITY NOT AVAILABLE 6/	44	26652	28	18270	5	3170	5	1939	4	2654	2	619
MINORITY STATUS 8/ WHITE NON-HISPANIC	318	225372	223	154055	22	12900	34	29853	37	28101	2	463
									70	45551	1	465
OTHERS, INCLUDING HISPANIC	760	484236	548	348522	52	33659	89	56039	70	45551		405
TOTAL 14/	1514	863267	1040	600836	107	59002	210	110933	151	90373	6	2123

Report Date: 05/21/2015

INSTITUTION: 0000476810 - 9 CITIBANK, N.A.

INCOME, RACE AND ETHNICITY		cations ved 20/	Loa Origir		Apps, App Not Acc		Applica Den		Applic Witho		Files Clo Incompl	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/ AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	6	1151	2	352			2	486	1	100	1	213
BLACK OR AFRICAN AMERICAN	1	559	1	559			_			,	,	
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	12	2755	5	815			4	1432	3	508		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	2	286					2	286				
ETHNICITY 7/												
HISPANIC OR LATINO	4	1511	1	236			2	1097	1	178		
NOT HISPANIC OR LATINO	16	3120	7	1490			5	987	3	430	1	213
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	1	120					1	120				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	8	1244	4	579			2	335	2	330		
OTHERS, INCLUDING HISPANIC	11	3221	4	1147			4	1583	2	278	1	213
50-79% OF MSA/MD MEDIAN												
RACE 5/ AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	26	6540	15	3730			4	898	5	1352	2	560
BLACK OR AFRICAN AMERICAN	11	3889	8	2593			2	735	1	561		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1	347					1	347				
WHITE	26	6153	17	3885			5	1179	3	829	1	260
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	7	1563	4	804			1	209	2	550		
ETHNICITY 7/												
HISPANIC OR LATINO	13	3118	8	1905			4	965	1	248		
NOT HISPANIC OR LATINO	55	14689	35	8972			9	2403	8	2494	3	820
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	3	685	1	135					2	550		
MINORITY STATUS 8/ WHITE NON-HISPANIC	14	3244	9	1980			2	423	2	581	1	260
OTHERS, INCLUDING HISPANIC	51	13894	31	8228			11	2945	7	2161	2	560

INSTITUTION: 0000476810 - 9 CITIBANK, N.A.

INCOME, RACE AND ETHNICITY (CONTINUED)		cations ved 20/	Loa Origin		Apps. App Not Acc		Applica Deni		Applic Witho		Files Clo Incompl	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
80-99% OF MSA/MD MEDIAN						_						
RACE 5/ AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	27	8645	15	5221			7	1953	5	1471		
BLACK OR AFRICAN AMERICAN	5	2091	3	1294			2	797				
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	1	233	1	233								
WHITE	24	7283	17	5256			4	1057	3	970		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1	259	1	259								
RACE NOT AVAILABLE 6/	1	240	1	240								
ETHNICITY 7/ HISPANIC OR LATINO	6	1900	3	803			2	774	1	323		
NOT HISPANIC OR LATINO	52	16611	34	11460			11	3033	7	2118		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	32	10011	34	. 11400			11	3033	,	2110		
ETHNICITY NOT AVAILABLE 6/	1	240	1	240								
MINORITY STATUS 8/												
WHITE NON-HISPANIC	19	5591	15	4661			2	283	2	647		
OTHERS, INCLUDING HISPANIC	39	12920	22	7602			11	3524	6	1794		_
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	518	1	518								
ASIAN	36	13604	23	8597	1	332	1	550	10	3702	1	423
BLACK OR AFRICAN AMERICAN	6	2126	5	1751					1	375		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND												
WHITE	24	8977	. 15	5623			3	1230	5	1860	1	264
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	2	699	2	699								
RACE NOT AVAILABLE 6/	4	1126	2	526					2	600		
ETHNICITY 7/ HISPANIC OR LATINO	4	1356	3	1092							1	264
NOT HISPANIC OR LATINO	64	24256	43	15984	1	332	4	1780	15	5737	1	423
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	269	1	269	•	332	7	1700	15	3137	ı	723
ETHNICITY NOT AVAILABLE 6/	4	1169	1	369					3	800		
MINORITY STATUS 8/ WHITE NON-HISPANIC	20	7621	12	4531			3	1230	5	1860		
OTHERS, INCLUDING HISPANIC	49	18303	34	12657	1	332	1	550	11	4077	2	687

INSTITUTION: 0000476810 - 9 CITIBANK, N.A.

INCOME, RACE AND ETHNICITY (CONTINUED)		ications ived 20/	Loa Origir		Apps. App Not Acc		Applica Den		Applio Witho		Files Clo Incompl	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	9	7656	6	5510					3	2146		
ASIAN	426	289029	338	229459	2	1142	21	15759	57	37273	8	5396
BLACK OR AFRICAN AMERICAN	11	7823	10	7283					1	540		
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	3	1577	3	1577								
WHITE	230	168602	177	130174	2	2430	10	7248	36	24670	5	4080
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	31	22992	20	14099			2	2800	7	4668	2	1425
RACE NOT AVAILABLE 6/	98	71764	80	60046			5	3112	12	8056	1	550
ETHNICITY 7/												
HISPANIC OR LATINO	13	9341	8	5278			2	877	2	2186	1	1000
NOT HISPANIC OR LATINO	697	487094	547	381660	4	3572	32	25435	100	66526	14	9901
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	7	4563	6	4302					1	261		
ETHNICITY NOT AVAILABLE 6/	91	68445	73	56908			4	2607	13	8380	1	550
MINORITY STATUS 8/												
WHITE NON-HISPANIC	214	155411	166	120754	2	2430	10	7248	32	21899	4	3080
OTHERS, INCLUDING HISPANIC	495	340253	387	265173	2	1142	24	19043	71	47074	11	7821
TOTAL 14/	1044	645869	780	495430	5	3904	77	41578	160	91786	22	13171

## Attachment F Additional Data Provided the Other Lenders

		·

### Wells Fargo's City of Oakland HMDA Originations, Purchases and Fundings 2013 and 2014

				2013			
	Ori	ginations	Purchased	I/Correspondent	Fundings (Originations+Purchases)		
Loan Type	Units	Amt (in thousands)	Units	Amt (in thousands)	Units	Amt (in thousands)	
Conventional	1,442	595,033	599	200,035	2,041	795,068	
FHA	87	24,385	120	38,982	207	63,367	
VA	15	7,637	16	7,413	31	15,050	
Total	1,544	627,055	735	246,430	2,279	873,485	

	2014									
	Ori	ginations	Purchased	/Correspondent	Fundings (Originations+Purchases)					
Loan Type	Units	Amt (in thousands)	Units	Amt (in thousands)	Units	Amt (in thousands)				
Conventional	812	365,264	223	68,952	1,035	434,216				
FHA	30	10,190	70	24,316	100	34,506				
VA	4	1,990	20	9,085	24	11,075				
Total	846	377,444	313	102,353	1,159	479,797				

## HMDA for Oakland, CA\* Originated/Purchased

Mortgage Purpose	Account Count	Account Count	Account Count	Account Count	Account Count	Account Count
	· <u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>
Home purchase	1,676	1,162	803	204	178	180
Home improvement	101	53	21	11	40	36
Refinance	<u>2,166</u>	<u>1,786</u>	<u>1,120</u>	<u>893</u>	<u>1,080</u>	<u>467</u>
	3,943	3,001	1,944	1,108	1,298	683
Mortgage Purpose	Extract Amount	Extract Amount	Extract Amount	Extract Amount	Extract Amount	Extract Amount
	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>
Home purchase	\$455,842,211	\$349,432,083	\$238,120,756	\$68,895,521	\$80,123,965	\$106,295,455
Home improvement	\$31,334,678	\$12,585,646	\$3,738,553	\$2,010,954	\$7,588,337	\$7,585,223
Refinance	\$803,024,89 <u>6</u>	\$659,611,407	\$406,766,140	\$311,948,64 <u>5</u>	\$345,313,494	\$145,919,056
	\$1,290,201,785		\$648,625,449	\$382,855,120	\$433,025,796	\$259,799,735

Source: Bank of America Public Goal System

<sup>\*</sup> filtered by zip codes - 94601-94615,94617-94624,94649,94659-94662,94666

### 2014 HMDA FULL YEAR MIS mr Active Filters

### ( State is CA and MSA is Oakland-Fremont-Hayward, CA MD)

Property Type is One to Four-Family and (Purpose is Home Purchase) and (Action is Originated)

			Tract Income Level as % o	f MSA Median							
City	Race_Eth	Data	Low < 50%		Moderate 50 - 79.99%		Middle 80 - 119.99%		Upper > = 120%		<b>Grand Tota</b>
OAKLAND	Asian	Count		4		4			····	3	1
		Sum of Loan Amount	\$	1,397	\$	1,287			\$	2,790	\$ 5,47
	Black	Count		6				1		2	
		Sum of Loan Amount	\$	2,552			\$	559	\$	1,328	\$ 4,439
	White	Count		3		13		11		15	4
		Sum of Loan Amount	\$	726	\$	4,721	\$	4,836	\$	11,280	\$ 21,563
	Not Prov	Count		1		2		1		5	
		Sum of Loan Amount	\$	369	\$	1,154	\$	425	\$	4,424	\$ 6,372
	Hispanic	Count		1		2					
		Sum of Loan Amount	\$	224	\$	700					\$ 924
OAKLAND Count				15		21		13		25	. 7
OAKLAND Sum of Loa	n Amount		\$	5,268	\$	7,862	\$	5,820	\$	19,822	\$ 38,772
Total Count				15		21		13		25	7
Total Sum of Loan Am	ount		S	5,268	Ś	7,862	S	5,820	\$	19,822	\$ 38,772

### 2014 HMDA FULL YEAR MIS mr

### Active Filters

( State is CA and MSA is Oakland-Fremont-Hayward, CA MD)

Property Type is One to Four-Family and (Purpose is Refinancing) and (Action is Originated)

			Tract Income Lev	el as % of MSA	Median			
City	Race_Eth	Data	Low < 50%		Moderate 50 - 79.99%	Middle 80 - 119.99%	Upper > = 120%	Grand Total
OAKLAND	Asian	Count		6	3	3	3	15
]		Sum of Loan Amount	\$	1,227	\$ 434	\$ 706	\$ 1,856	\$ 4,223
]	Black	Count		8		. 4	. 6	21
		Sum of Loan Amount	\$	1,316	\$ 907	\$ 1,158	\$ 2,280	\$ 5,661
ĺ	White	Count		7	6	4	20	37
		Sum of Loan Amount	\$	1,543	\$ 2,233	\$ 1,469	\$ 11,481	\$ 16,726
	Not Prov	Count		1	2	2	1	6
		Sum of Loan Amount	\$	450	\$ 1,037	\$ 327	\$ 540	\$ 2,354
	Hispanic	Count		5	2	1	1	9
		Sum of Loan Amount	\$	647	\$ 353	\$ 327	\$ 418	\$ 1,745
OAKLAND Cou	nt			27		14	31	88
OAKLAND Sum	of Loan Amount		\$	5,183	\$ 4,964	\$ 3,987	\$ 16,575	\$ 30,709
Total Count				27	16	14	31	88
Total Sum of Lo	oan Amount		\$	5,183	\$ 4,964	\$ 3,987	\$ 16,575	\$ 30,709

### 2013 HMDA FULL YEAR MIS mr

### Active Filters

### ( State is CA and MSA is Oakland-Fremont-Hayward, CA MD)

Property Type is One to Four-Family and ( Purpose is Home Purchase ) and (Action is Originated)

			Tract Income Level as % of MSA Median					
City	Race_Eth	Data	Low < 50%	Moderate 50 - 79.99%	Middle 80 - 119.99%	Upper > = 120%		Grand Total
OAKLAND	Asian	Count	7		3	2	3	15
		Sum of Loan Amount	\$ 1,755	\$	1,054 \$	1,324 \$	1,502	\$ 5,635
	Black	Count	3		1	1	1	6
		Sum of Loan Amount	\$ 1,089	\$	204 \$	450 \$	501	\$ 2,244
	White	Count	7		7	3	6	23
		Sum of Loan Amount	\$ 2,642	\$	2,084 \$	1,664 \$	4,438	\$ 10,828
	Not Prov	Count	21		3	2	10	36
	ŀ	Sum of Loan Amount	\$ 7,751	\$	1,305 \$	755 \$	7,114	\$ 16,925
	Hispanic	Count	2					2
		Sum of Loan Amount	\$ 769				·	\$ 769
OAKLAND Cour	nt		40		14	8	20	82
OAKLAND Sum	of Loan Amoun	t	\$ 14,006	\$	4,647 \$	4,193 \$	13,555	\$ 36,401
Total Count			40		14	8	20	82
Total Sum of Lo	an Amount		\$ 14,006	\$	4,647 \$	4,193 \$	13,555	\$ 36,401

### 2013 HMDA FULL YEAR MIS mr

### Active Filters

( State is CA and MSA is Oakland-Fremont-Hayward, CA MD)

Property Type is One to Four-Family and (Purpose is Refinancing) and (Action is Originated)

			Tract Income Level as % of MSA Median								
City	Race_Eth	Data	Low < 50%		Moderate 50	- 79.99%	Middle 80	- 119.99%	Upper > = 120%	Grand Total	
OAKLAND	Amerind	Count								1	1
		Sum of Loan Amount							\$ 222	\$	222
}	Asian	Count		37		17		8	20	o	82
		Sum of Loan Amount	\$	6,140	\$	3,390	\$	2,144	\$ 10,461	. \$	22,135
	Black	Count		29		16		16	10	וס	71
		Sum of Loan Amount	\$	4,649	\$	3,638	\$	2,948	\$ 3,549	\$	14,784
	Hawaii	Count				2			;	1	3
		Sum of Loan Amount	1		\$	486			\$ 381	\$	867
	White	Count		20		36		45	74	1	175
		Sum of Loan Amount	\$	4,063	\$	9,074	\$	11,529	\$ 31,736	\$	56,402
l	Not Prov	Count		23		7		11	23	3	64
	1	Sum of Loan Amount	\$	4,249	\$	1,380	\$	2,806	\$ 14,870	\$	23,305
	Hispanic	Count		17		7		1		1	26
		Sum of Loan Amount	\$	3,318	\$	1,088	\$	200	\$ 471	\$	5,077
OAKLAND Coun	t			126		85		81	130	0	422
OAKLAND Sum	of Loan Amount		\$	22,419	\$	19,056	\$	19,627	\$ 61,690	\$	122,792
Total Count				126		85		81	130		422
Total Sum of Loa	an Amount		\$	22,419	\$	19,056	\$	19,627	\$ 61,690	\$	122,792

# Attachment G Race and Ethnicity Data Provided by Greenlining

## Lender Performance Among Asian Borrowers in Oakland (2013)

OAKLAND	Median Loan Amount for Loans Originated	Median Income for Loans Originated	Total Applications	Share of Total Apps (%)	Total Loans	Share of Total Loans (%)	Total Conversion Rate (%)	Total Dollars Lent, (000s)
Wells Fargo	307.0	114.0	94	29.1%	54	26.5%	57.4%	20,016
JP Morgan Chase	236.0	43.0	23	14.9%	16	14.4%	69.6%	6,735
ВоА	211.5	81.0	44	26.5%	30	24.2%	68.2%	8,657
Citibank	173.5	57.0	36	26.9%	16	24.6%	44.4%	4,096
Fremont Bank	173.0	103.0	28	25.0%	18	33.3%	64.3%	3,663
Quicken	233.0	93.0	11	14.1%	11	17.5%	100%	3,152
Stearns	210.0	60.0	36	67.9%	25	71.4%	69.4%	6,105
US Bank	250.0	91.0	15	35.7%	8	34.8%	53.3%	1,570
Nationstar	215.0	194.0	5	14.7%	1	6.7%	20%	215
Flagstar	250.5	88.0	10	30.3%	6	24.0%	60%	1,436
Cashcall	220.0	129.0	1	3.4%	1	6.3%	100%	220
Loandepot.com	n/a	n/a	1	5.0%	0	0.0%	0%	0

In 2013, the above listed lenders Originated a total of 37 home purchases and 147 Refinances to Asians in Oakland

# Lender Performance Among African American Borrowers in Oakland (2013)

OAKLAND	Median Loan Amount	Median Income for Loans Originated	Total Applications		Total Loans Originated	Share of Total Loans	Total Conversion Rate	Total Dollars Lent, (000s)
Wells Fargo	345.0	83.0	27	8.4%	13	6.4%	48.1%	4,776
JP Morgan Chase	252.0	110.0	11	7.1%	9	8.1%	81.8%	3,076
BoA	153.5	80.0	14	8.4%	10	8.1%	71.4%	1,537
Citibank	373.0	176.5	15	11.2%	4	6.2%	26.7%	1,563
Fremont Bank	375.0	128.0	5	4.5%	1	1.9%	20.0%	375
Quicken	328.5	83.0	2	2.6%	2	3.2%	100.0%	657
Stearns	360.0	124.0	2	3.8%	1	2.9%	50.0%	360
US Bank	463.0	253.0	2	4.8%	., <b>,1</b>	4.3%	50.0%	463
Nationstar	177.0	47.0	8	23.5%	4	26.7%	50.0%	804
Flagstar	350.5	211.0	2	6.1%	2	8.0%	100.0%	701
Cashcall	n/a	n/a	0	0.0%	0	0.0%	0%	0
Loandepot.com	294.0	86.0	4	20.0%	1	16.7%	25.0%	294

In 2013, the above listed banks Originated a total of 4 home purchases and 43 Refinances to African Americans in Oakland

# Lender Performance Among Hispanic Borrowers in Oakland (2013)

OAKLAND	Median Loan Amount	Median Income for Loans Originated	Total Applications	Share of Total Apps (%)	Total Loans	Share of Total Loans (%)	Total Conversion Rate (%)	Total Dollars Lent, (000s)
Wells Fargo	226.0	116.0	30	9.3%	19	9.3%	63.3%	4,314
JP Morgan Chase	201.0	51.0	18	11.7%	14	12.6%	77.8%	3,676
ВоА	186.5	45.0	18	10.8%	14	11.3%	77.8%	3,503
Citibank	99.0	65.0	9	6.7%	4	6.2%	44.4%	495
Fremont Bank	n/a	n/a	1888 <b>4</b> 888 6	3.6%	0	0%	0%	0
Quicken	272.0	127.0	4	5.1%	4	6.3%	100%	1,251
Stearns	57.5	205.0	finiilii <b>3</b> Kiipe,	5.7%	2	5.7%	66.7%	410
US Bank	n/a	n/a	0	0.0%	0	0%	0%	0
Nationstar	n/a	n/a	0	0.0%	0	0%	0%	0
Flagstar	328.5	131.0	:::::::2::::::::::::	6.1%	2	8.0%	100%	657
Cashcall	335.0	120.0	2	6.9%	1	6.3%	50%	335
Loandepot.com	n/a	n/a	0	0.0%	0	0%	0%	0

In 2013, the above listed banks Originated a total of 7 home purchases and 50 Refinances to Hispanics in Oakland

# Lender Performance Among white Borrowers in Oakland (2013)

OAKLAND	Median Loan Amount	Median Income	Total Apps	Share of Total Apps (%)	Total Loans	Share of Total Loans (%)	Total Conversion Rate (%)	Total Dollars Lent, (000s)
Wells Fargo	372.0	137.0	169	52.3%	117	57.4%	69.2%	46,478
JP Morgan Chase	217.0	105.0	74	48.1%	46	41.4%	62.2%	11,871
ВоА	322.5	126.0	78	47.0%	62	50.0%	79.5%	24,326
Citibank	244.0	120.5	55	41.0%	30	46.2%	54.5%	11,288
Fremont Bank	323.0	123.0	22	19.6%	9	16.7%	40.9%	4,094
Quicken	337.0	140.0	53	67.9%	42	66.7%	79.2%	15,463
Stearns	63.0	205.0	11	20.8%	6	17.1%	54.5%	1,372
US Bank	250.0	161.0	13	31.0%	9	39.1%	69.2%	2,791
Nationstar	368.0	146.5	15	44.1%	6	40.0%	40.0%	2,361
Flagstar	269.5	107.0	18	54.5%	16	64.0%	88.9%	4,592
Cashcall - Francisco	335.0	143.0	20	69.0%	11	68.8%	55.0%	4,142
Loandepot.com	440.0	220.0	10	50.0%	4	66.7%	40.0%	1,691

In 2013, the above listed banks Originated a total of 40 home purchases and 307 Refinances to whites in Oakland

# Missing Race Data and Originations by Income

## Missing Race and Ethnicity Data by Bank

Banks No Race/Eth	h App No Race/Eth Origns
Wells Fargo	9.3% 9%
JP Morgan Chase	27% 32%
BoA	13% 14%
Citibank	18% 20%
Fremont Bank	50% 48%
Quicken	14% 21%
Stearns	8% 9%
US Bank	29% 17%
Nationstar	12% 20%
Flagstar	9% 9%
Cashcall Harman Harman Harman	25%
Loandepot.com	20% 17%

Table 5: Originations by Income (%)

AMI group	<30%AMI:	30-50% AMB	50-80%/AM	80-100% AMI	100-120% AMI	>126% AMI
% of Loans Originated	3%	7%	12%	15%	8%	55%
Origination Rate	51.3%	57.5%	50.3%	58.5%	67.1%	67.9%

# Attachment H Sample FFIEC Small Business Loans Data

Respondent ID: 0000000008

Agency: OCC - 1

State: CALIFORNIA (06)

Loans by County
Small Business Loans - Originations
Institution: JPMorgan Chase Bank, NA

Area Income Characteristics	Origi	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	
ALAMEDA COUNTY (001), CA 2/											
MSA 36084											
Inside AA 0206											
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0	
Median Family Income 10-20%	0	0	1	200	1	600	1	200	0	0	
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0	
Median Family Income 30-40%	5	269	1	150	2	700	2	104	0	0	
Median Family Income 40-50%	4	279	0	0	1	555	3	252	0	0	
Median Family Income 50-60%	4	146	1	110	4	2,266	2	91	0	0	
Median Family Income 60-70%	7	404	1	250	3	1,750	1	100	0	0	
Median Family Income 70-80%	5	246	3	500	0	0	1	125	0	0	
Median Family Income 80-90%	3	180	0	0	5	3,363	4	1,527	0	0	
Median Family Income 90-100%	7	440	2	363	9	5,471	3	1,075	0	0	
Median Family Income 100-110%	12	585	1	150	2	700	4	168	0	0	
Median Family Income 110-120%	1	25	2	400	3	1,600	1	25	0	0	
Median Family Income >= 120%	53	2,487	18	3,269	30	14,422	18	3,257	0	0	
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0	
Tract Not Known	0	0	0	0	0	0	0	0	0	0	
County Total	101	5,061	30	5,392	60	31,427	40	6,924	0	0	
Outside Assessment Area											
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0	
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0	
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0	
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0	
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0	
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0	
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0	
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0	
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0	
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0	
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0	
Median Family Income >= 120%	0	0	0	0	0	0	0	0	0	0	

<sup>2/</sup> County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

PAGE: 2 OF

31

Respondent ID: 0000000008

Agency: OCC - 1 State: CALIFORNIA (06)

Loans by County
Small Business Loans - Originations
Institution: JPMorgan Chase Bank, NA

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
,	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	1	93	0	0	2	711	1	411	0	0
County Total	1	93	0	0	2	711	1	411	0	0
Totals For County: (001) 2/										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	1	200	1	600	1	200	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	5	269	1	150	2	700	2	104	0	0
Median Family Income 40-50%	4	279	0	0	1	555	3	252	0	0
Median Family Income 50-60%	4	146	1	110	4	2,266	2	91	0	0
Median Family Income 60-70%	7	404	1	250	3	1,750	1	100	0	0
Median Family Income 70-80%	5	246	3	500	0	0	1	125	0	0
Median Family Income 80-90%	3	180	0	0	5	3,363	4	1,527	0	0
Median Family Income 90-100%	7	440	2	363	9	5,471	3	1,075	0	0
Median Family Income 100-110%	12	585	1	150	2	700	4	168	0	0
Median Family Income 110-120%	1	25	2	400	3	1,600	1	25	0	0
Median Family Income >= 120%	53	2,487	18	3,269	30	14,422	18	3,257	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	1	93	0	0	2	711	1	411	0	0
County Total	102	5,154	30	5,392	62	32,138	41	7,335	0	0
BUTTE COUNTY (007), CA										
MSA 17020										
Inside AA 0036										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	2	126	2	350	0	0	1	150	0	0
Middle Income	3	137	0	0	2	600	1	5	0	0
Upper Income	1	50	1	130	1	350	1	50	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	1	79	0	0	0	0	0	0	0	0
County Total	7	392	3	480	3	950	3	205	0	0

<sup>2/</sup> County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

PAGE: 1 OF

Respondent ID: 0000000001

Agency: OCC - 1 State: CALIFORNIA (06)

Loans by County
Small Business Loans - Originations
Institution: WELLS FARGO BANK, N.A.

Area Income Characteristics	Origi	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	
ALAMEDA COUNTY (001), CA 2/											
MSA 36084											
Inside AA 0045											
Median Family Income < 10%	2	110	0	0	0	0	1	10	0	0	
Median Family Income 10-20%	30	1,138	3	505	1	637	20	730	0	0	
Median Family Income 20-30%	52	1,387	4	613	3	1,600	40	887	0	0	
Median Family Income 30-40%	342	10,885	16	2,511	19	10,291	263	8,311	0	0	
Median Family Income 40-50%	237	5,924	7	1,062	8	4,466	192	4,721	0	0	
Median Family Income 50-60%	392	11,194	19	2,847	15	8,113	318	10,175	0	0	
Median Family Income 60-70%	416	13,358	16	2,708	16	8,574	325	9,629	0	0	
Median Family Income 70-80%	513	13,873	10	1,315	15	9,055	408	10,961	0	0	
Median Family Income 80-90%	445	13,451	20	3,580	10	4,563	337	9,591	0	0	
Median Family Income 90-100%	566	14,962	28	4,611	20	11,477	466	11,348	0	0	
Median Family Income 100-110%	547	13,829	17	2,415	5	3,066	439	10,367	0	0	
Median Family Income 110-120%	514	14,154	20	3,153	13	5,849	437	11,880	0	0	
Median Family Income >= 120%	2,563	76,767	116	17,706	83	43,760	2,035	58,340	0	0	
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0	
Tract Not Known	0	0	0	0	0	0	0	0	0	0	
County Total	6,619	191,032	276	43,026	208	111,451	5,281	146,950	0	0	
Outside Assessment Area											
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0	
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0	
Tract Not Known	173	8,314	18	2,168	0	0	112	4,847	0	0	
County Total	173	8,314	18	2,168	0	0	112	4,847	0	0	
Totals For County: (001) 2/											
Median Family Income < 10%	2	110	0	0	0	0	1	10	0	0	
Median Family Income 10-20%	30	1,138	3	505	1	637	20	730	0	0	
Median Family Income 20-30%	52	1,387	4	613	3	1,600	40	887	0	0	
Median Family Income 30-40%	342	10,885	16	2,511	19	10,291	263	8,311	0	0	
Median Family Income 40-50%	237	5,924	7	1,062	8	4,466	192	4,721	0	0	
Median Family Income 50-60%	392	11,194	19	2,847	15	8,113	318	10,175	0	0	
Median Family Income 60-70%	416	13,358	16	2,708	16	8,574	325	9,629	0	0	

<sup>2/</sup> County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

PAGE: 2 OF 32

Respondent ID: 0000000001

Agency: OCC - 1 State: CALIFORNIA (06)

Loans by County
Small Business Loans - Originations
Institution: WELLS FARGO BANK, N.A.

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
Median Family Income 70-80%	513	13,873	10	1,315	15	9,055	408	10,961	0	0
Median Family Income 80-90%	445	13,451	20	3,580	10	4,563	337	9,591	0	0
Median Family Income 90-100%	566	14,962	28	4,611	20	11,477	466	11,348	0	0
Median Family Income 100-110%	547	13,829	17	2,415	5	3,066	439	10,367	0	0
Median Family Income 110-120%	514	14,154	20	3,153	13	5,849	437	11,880	0	0
Median Family Income >= 120%	2,563	76,767	116	17,706	83	43,760	2,035	58,340	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	173	8,314	18	2,168	0	0	112	4,847	0	0
County Total	6,792	199,346	294	45,194	208	111,451	5,393	151,797	0	0
ALPINE COUNTY (003), CA										-
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	2	113	1	123	1	400	2	415	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	113	1	123	.1	400	2	415	0	0
AMADOR COUNTY (005), CA										
MSA NA										
Inside AA 0034										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	57	2,094	3	525	1	300	36	1,131	0	0
Upper Income	25	673	3	581	1	313	22	861	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	38	1,776	2	206	0	0	23	877	0	0
County Total	120	4,543	8	1,312	2	613	81	2,869	0	0

<sup>2/</sup> County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

PAGE:

1 OF

28

, 0,

Loans by County

Small Business Loans - Originations

Institution: Bank of America, N.A.

Agency: OCC - 1

State: CALIFORNIA (06)

Respondent ID: 0000013044

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
ALAMEDA COUNTY (001), CA 2/										
MSA 36084										
Inside AA 0001										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	2	9	1	125	1	500	1	4	0	0
Median Family Income 20-30%	9	71	1	150	1	350	7	52	0	0
Median Family Income 30-40%	79	1,328	3	572	5	3,850	39	552	0	0
Median Family Income 40-50%	62	1,342	3	600	2	1,400	26	237	0	0
Median Family Income 50-60%	87	1,641	3	705	7	3,279	51	1,312	0	0
Median Family Income 60-70%	71	1,539	7	1,329	11	6,946	35	420	0	0
Median Family Income 70-80%	119	2,076	4	751	6	3,761	68	707	0	0
Median Family Income 80-90%	97	2,022	10	1,940	4	1,600	45	392	0	0
Median Family Income 90-100%	137	2,603	4	1,000	11	5,711	77	2,033	0	0
Median Family Income 100-110%	121	2,855	2	400	3	1,283	68	691	0	0
Median Family Income 110-120%	98	1,902	2	500	15	7,168	57	3,634	0	0
Median Family Income >= 120%	509	12,185	19	3,695	42	23,718	238	5,440	0	0
Median Family Income Not Known	. 0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1,391	29,573	59	11,767	108	59,566	712	15,474	0	0
ALPINE COUNTY (003), CA										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	12	0	0	0	0	1	12	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	12	0	0	0	0	1	12	0	0

<sup>2/</sup> County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

PAGE: 2 OF

Respondent ID: 0000013044

Agency: OCC - 1

State: CALIFORNIA (06)

Loans by County Small Business Loans - Originations Institution: Bank of America, N.A.

Area Income Characteristics	Orig	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	
AMADOR COUNTY (005), CA											
MSA NA											
Inside AA 0001											
Low Income	0	0	0	0	0	0	0	0	0	0	
Moderate Income	0	0	0	0	0	0	0	0	0	0	
Middle Income	11	273	2	400	2	800	4	39	0	0	
Upper Income	6	311	1	135	1	320	4	381	0	0	
Income Not Known	0	0	0	0	0	0	0	0	0	0	
Tract Not Known	0	0	0	0	0	0	0	0	0	0	
County Total	17	584	3	535	3	1,120	8	420	0	0	
BUTTE COUNTY (007), CA											
MSA 17020											
Inside AA 0001											
Low Income	0	0	0	0	0	0	0	0	0	0	
Moderate Income	24	595	0	0	1	839	13	166	0	0	
Middle Income	39	889	0	0	3	1,725	15	677	0	0	
Upper Income	24	514	0	0	1	402	8	560	0	0	
Income Not Known	0	0	0	0	0	0	0	0	0	0	
Tract Not Known	0	0	0	0	0	0	0	0	0	0	
County Total	87	1,998	0	0	5	2,966	36	1,403	0	0	
CALAVERAS COUNTY (009), CA											
MSA NA											
Inside AA 0001											
Low Income	0	0	0	0	0	0	0	0	0	0	
Moderate Income	3	45	0	0	0	0	2	40	0	0	
Middle Income	6	182	0	0	1	500	3	55	0	0	
Upper Income	18	463	0	0	0	0	3	16	0	0	
Income Not Known	0	0	0	0	0	0	0	0	0	0	
Tract Not Known	0	0	0	0	0	0	0	0	0	0	
County Total	27	690	0	0	1	500	8	111	0	0	

<sup>2/</sup> County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

32

**Loans by County** 

Small Business Loans - Originations

Institution: CITIBANK, N.A.

Respondent ID: 0000001461

Agency: OCC - 1 State: CALIFORNIA (06)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
ALAMEDA COUNTY (001), CA 2/							-			
MSA 36084										
Inside AA 0001										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	6	131	0	0	0	0	3	24	0	0
Median Family Income 20-30%	13	60	0	0	0	0	5	11	0	0
Median Family Income 30-40%	109	659	0	0	0	0	57	381	0	0
Median Family Income 40-50%	153	660	0	0	0	0	59	255	0	0
Median Family Income 50-60%	148	953	1	200	0	0	73	551	0	0
Median Family Income 60-70%	168	1,104	1	150	0	0	92	702	0	0
Median Family Income 70-80%	234	1,556	0	0	0	0	97	881	0	0
Median Family Income 80-90%	239	1,495	0	0	0	0	108	655	0	0
Median Family Income 90-100%	252	1,517	1	200	0	0	119	800	0	0
Median Family Income 100-110%	267	1,706	0	0	0	0	132	1,041	0	0
Median Family Income 110-120%	217	1,431	0	0	0	0	116	761	0	0
Median Family Income >= 120%	1,117	9,668	2	300	1	750	586	5,064	0	0
Median Family Income Not Known	2	3	0	0	0	0	1	1	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2,925	20,943	5	850	1	750	1,448	11,127	0	0
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	. 0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	6	25	0	0	0	0	4	18	0	0
County Total	6	25	0	0	0	0	4	18	0	0
Totals For County: (001) 2/										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	6	131	0	0	0	0	3	24	0	0
Median Family Income 20-30%	13	60	0	0	0	0	5	11	0	0
Median Family Income 30-40%	109	659	0	0	0	0	57	381	0	0

<sup>2/</sup> County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

PAGE: 2 OF

32

Loans by County

**Small Business Loans - Originations** 

Institution: CITIBANK, N.A.

Respondent ID: 0000001461

Agency: OCC - 1 State: CALIFORNIA (06)

Area Income Characteristics	Origi	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	
Median Family Income 40-50%	153	660	0	0	0	0	59	255	0	0	
Median Family Income 50-60%	148	953	1	200	0	0	73	551	0	0	
Median Family Income 60-70%	168	1,104	1	150	0	0	92	702	0	0	
Median Family Income 70-80%	234	1,556	0	0	0	0	. 97	881	0	0	
Median Family Income 80-90%	239	1,495	0	0	0	0	108	655	0	0	
Median Family Income 90-100%	252	1,517	1	200	0	0	119	800	0	0	
Median Family Income 100-110%	267	1,706	0	0	0	0	132	1,041	0	0	
Median Family Income 110-120%	217	1,431	0	0	0	0	116	761	0	0	
Median Family Income >= 120%	1,117	9,668	2	300	1	750	586	5,064	0	0	
Median Family Income Not Known	2	3	0	0	0	0	1	1	0	0	
Tract Not Known	6	25	0	0	0	0	4	18	0	0	
County Total	2,931	20,968	5	850	1	750	1,452	11,145	0	0	
ALPINE COUNTY (003), CA											
MSA NA											
Outside Assessment Area											
Low Income	0	0	0	0	0	0	0	0	0	0	
Moderate Income	0	0	0	0	0	0	0	0	0	0	
Middle Income	0	0	0	0	0	0	0	0	0	0	
Upper Income	5	41	0	0	0	0	0	0	0	0	
Income Not Known	0	0	0	0	0	0	0	0	0	0	
Tract Not Known	0	0	0	0	0	0	0	0	0	0	
County Total	5	41	0	0	0	0	0	0	0	0	
AMADOR COUNTY (005), CA											
MSA NA											
Outside Assessment Area											
Low Income	0	0	0	0	0	0	0	0	0	0	
Moderate Income	0	0	0	0	0	0	0	0	0	0	
Middle Income	31	187	0	0	0	0	17	91	0	0	
Upper Income	17	62	0	0	0	0	9	21	0	0	
Income Not Known	0	0	0	0	0	0	0	0	0	0	
Tract Not Known	2	3	0	0	0	0	2	3	0	0	
County Total	50	252	0	0	0	0	28	115	0	0	

<sup>2/</sup> County only partially included in the institution's assessment area(s). At least one census tract in the county is not included in the institution's assessment area definition.

## Attachment I Sample FFIEC Community Development Loan Data

Institution: JPMorgan Chase Bank, NA

			Memo Item: Loans by Affiliates			
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)		
Community Development Loans			,			
Originated	1,484	4,887,321	0	0		
Purchased	0	0	0	0		
Total	1,484	4,887,321	0	0		
Consortium/Third Party Loans (optional)						

Respondent ID: 0000000008

Agency: OCC - 1

PAGE: 1 OF

Institution: WELLS FARGO BANK, N.A.

Respondent ID: 0000000001

PAGE: 1 OF

Agency: OCC - 1

		Memo Item: Loans							
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)					
Community Development Loans									
Originated	761	4,452,033	0	0					
Purchased	0	0	0	0					
Total	761	4,452,033	0	0					
Connection (Third Body Loons (antional)									

Consortium/Third Party Loans (optional)

Institution: Bank of America, N.A.

Respondent ID: 0000013044

PAGE:

Agency: OCC - 1

		Memo Item: Loans by A							
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)					
Community Development Loans									
Originated	365	1,943,794	0	0					
Purchased	0	0	0	0					
Total	365	1,943,794	0	0					
Consortium/Third Party Loans (optional)									

,

•

Institution: CITIBANK, N.A.

Respondent ID: 0000001461

PAGE: 1 OF

Agency: OCC - 1

			Memo Item: Loans by Affiliates			
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)		
Community Development Loans						
Originated	257	3,408,732	0	0		
Purchased	1	3,762	0	0		
Total	258	3,412,494	0	0		
Consortium/Third Party Loans (optional)						