



PUBLIC DISCLOSURE

March 28, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

EagleBank

Bethesda, Maryland

**Federal Reserve Bank of Richmond
Richmond, Virginia**

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the Federal financial supervisory agency concerning the safety and soundness of this financial institution.

PUBLIC DISCLOSURE

March 28, 2022

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

EagleBank

2652092

7815 Woodmont Avenue
Bethesda, MD 20814

**Federal Reserve Bank of Richmond
P. O. Box 27622
Richmond, Virginia 23261**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the Federal financial supervisory agency concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

	Page
Institution Rating	
Institution's CRA Rating	2
Table of Performance Test Ratings.....	2
Summary of Major Factors Supporting Rating.....	2
Institution	
Description of Institution	4
Scope of Examination	5
Description of Washington-Arlington-Alexandria, DC-VA-MD Assessment Area	5
Conclusions With Respect to Performance Tests	7
Appendix A – 2019 Distribution Tables.....	18
Appendix B - Glossary.....	20

INSTITUTION RATING

INSTITUTION'S CRA RATING: EagleBank is rated "SATISFACTORY."

The following table indicates the performance level of EB with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	<u>EagleBank</u>		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

The major factors supporting the institution's rating include:

- Lending activity is consistent with the bank's capacity and reflects an excellent responsiveness to identified credit needs within the assessment area.
- A high percentage of the number and dollar volume of the institution's reported Home Mortgage Disclosure Act (HMDA) and small business loans were originated within the bank's assessment area.
- The geographic distribution of loans reflects good penetration throughout the assessment area.
- The distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different sizes.
- The bank exhibits an excellent record of serving the credit needs of low-income individuals and geographies as well as very small businesses.
- The bank was a leader in making community development loans.
- During the evaluation period, the bank made extensive use of innovative and/or flexible lending practices in serving assessment area credit needs.

- The bank maintains an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors, often in a leadership position.
- Overall, the bank makes extensive use of innovative and/or complex investments to support community development initiatives.
- The bank exhibits excellent responsiveness to credit and community development needs through its investment activity.
- Delivery systems and branch locations are reasonably accessible to all segments of the bank's geographies and individuals of different income levels in its assessment area.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.
- Banking services do not vary in a way that inconveniences its assessment area, particularly to low- and moderate-income geographies and/or low- and moderate-income individuals.
- During the evaluation period, the bank provided a relatively high level of qualified community development services given its capacity and available opportunities.
- There have been no complaints regarding the bank's CRA performance since the previous evaluation.
- The rating was not influenced by evidence of discrimination.

INSTITUTION

DESCRIPTION OF INSTITUTION

EagleBank (EB) is headquartered in Bethesda, Maryland, and is a wholly owned subsidiary of Eagle Bancorp, Incorporated, a single bank holding company also headquartered in Bethesda, Maryland. The bank has four non-bank subsidiaries: Eagle Insurance Services, LLC, which offers consumer and commercial insurance services; Fidelity & Trust Mortgage, Inc. which holds existing mortgage loans obtained through the bank’s merger with Fidelity & Trust Bank in 2008; Bethesda Leasing, LLC, which holds special or problem assets, and Landroval Municipal Finance Inc., which lends to municipalities by buying debt on the public market as well as direct purchase issuance. EB currently operates 17 full-service branch offices within the Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area (MSA). Since its previous evaluation in January 2018, the bank has relocated two branch offices, closed three branch offices, and opened a Loan Production Office (LPO) within its assessment area; however, this activity did not require adjustment to the bank’s CRA assessment area delineation.

As of December 31, 2021, the bank held total assets of approximately \$11.8 billion, of which 59.6% were net loans and 21.9% were securities, while deposits totaled approximately \$10 billion. Various deposit and loan products are available through the institution, including loans for residential mortgage, business, and consumer purposes. The composition of the loan portfolio (using gross loans) as of December 31, 2021, is depicted in the following table:

Composition of Loan Portfolio

Loan Type	12/31/2021	
	\$(000s)	%
Secured by 1-4 Family dwellings	344,103	4.8
Multifamily	646,400	9.1
Construction and Development	1,508,289	21.1
Commercial & Industrial/ NonFarm NonResidential	4,342,694	60.8
Consumer Loans and Credit Cards	1,064	0.0
Agricultural Loans/ Farmland	2,117	0.0
All Other	292,600	4.1
Total	7,137,267	100.0

As reflected in the preceding table, commercial and construction and development loans represent the largest loan types within the bank’s loan portfolio. Notwithstanding the proportional distribution of loans retained in the bank’s loan portfolio, EB originates and sells a large volume (by number and dollar) of loans secured by one-to-four family dwellings, and as reflected later in this evaluation, those loans comprise a significantly larger number of loans considered during the evaluation. Additionally, the bank offers consumer loans, but these loans represent a significantly smaller volume of loans both by number and dollar and were not considered in the evaluation of lending performance, as doing so would not yield meaningful information for rating the bank’s performance.

EB received an Outstanding rating at its previous CRA evaluation dated January 22, 2018. The bank does not face any legal impediments that would serve to constrain its ability to meet the credit needs of its assessment area.

SCOPE OF EXAMINATION

The institution was evaluated using the interagency examination procedures developed by the Federal Financial Institutions Examination Council (FFIEC) for large institutions. EB is required to report certain information regarding its home mortgage lending in accordance with the HMDA. Accordingly, the bank’s 2019 and 2020 HMDA loan originations were considered in the evaluation. EB is also required to collect and report data for small business loans in accordance with the CRA. Therefore, the evaluation incorporates an analysis of all small business loans originated by the bank during calendar years 2019 and 2020. The evaluation also considers any qualified community development loans, investments, and services originated, purchased, or provided since the previous evaluation dated January 22, 2018. In addition, all qualified investments outstanding as of the evaluation date were considered, regardless of when made. The bank did not report any small farm loans during the evaluation period.

To help determine the availability of community development opportunities in the assessment area, the CRA public evaluations of financial institutions operating within the assessment area were reviewed. Additionally, two members of the community were contacted to discern information about local economic conditions, local credit needs, performance of banks in the assessment area, as well as potential community development opportunities.

DESCRIPTION OF WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD ASSESSMENT AREA

EB’s assessment area is located within the Washington-Arlington-Alexandria, DC-VA-MD-WV MSA. The MSA is comprised of two metropolitan divisions; the bank takes a portion of both the Frederick-Gaithersburg-Rockville, MD and Washington-Arlington-Alexandria, DC-VA-MD-WV metropolitan divisions. The following table reflects the current composition of the bank’s assessment area.

Metropolitan Division	County/City	State	Census Tract
Frederick-Gaithersburg-Rockville, MD	Montgomery County	MD	All
	Prince George’s County	MD	All
Washington-Arlington-Alexandria, DC-VA-MD-WV	Arlington County	VA	All
	Fairfax County	VA	All
	Loudoun County	VA	All
	City of Alexandria	VA	All
	City of Fairfax	VA	All
	City of Falls Church	VA	All
	District of Columbia	DC	All

According to 2015 American Consumer Survey (ACS) data, the assessment area has a population of approximately 4.5 million and a median housing value of \$424,609. The owner-occupancy rate for the assessment area (56.1%) is higher than the rate in the District of Columbia (37.2%), but lower than the rates for the State of Maryland (60.1%) and the Commonwealth of Virginia (59.2%). The owner-occupancy rate for the assessment area is also lower than the rates in the Frederick-Gaithersburg-Rockville, MD (64.6%) and Washington-Arlington-Alexandria, DC-VA-MD-WV (57.8%) metropolitan divisions.

Within the assessment area, 5.9% of families are considered below the poverty level, which is lower than the percentage in both the State of Maryland (7%) and the Commonwealth of Virginia (8.2%), and significantly lower than the percentage in the District of Columbia (14.3%). The assessment area’s percentage of families below poverty is similar to the percentage in the Washington-Arlington-Alexandria, DC-VA-MD-WV metropolitan division (6.1%), but higher than the Frederick-Gaithersburg-Rockville, MD metropolitan division (4.6%).

The 2019 and 2020 Housing and Urban Development (HUD) adjusted median family income for the two metropolitan divisions are \$114,700 and \$118,700, respectively, for Washington-Arlington-Alexandria, DC-VA-MD-WV and \$123,600 and \$124,400, respectively, for Frederick-Gaithersburg-Rockville, MD. The following table provides pertinent demographic data for the assessment area:

Assessment Area Demographics

Washington-Arlington-Alexandria, DC-VA-MD <i>(Based on 2015 ACS Data and 2020 D&B Information)</i>								
Income Categories*	Tract Distribution		Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	117	11.3	98,924	9.6	21,262	21.5	224,780	21.8
Moderate	206	19.8	184,029	17.9	16,031	8.7	161,814	15.7
Middle	317	30.5	320,366	31.1	14,692	4.6	198,170	19.3
Upper	386	37.1	423,072	41.1	8,422	2.0	444,586	43.2
NA	14	1.3	2,959	0.3	496	16.8		
Total	1,040	100.0	1,029,350	100.0	60,903	5.9	1,029,350	100.0
	Owner Occupied Units by Tract		Households					
			HHs by Tract		HHs < Poverty by Tract		HHs by HH Income	
	#	%	#	%	#	%	#	%
Low	42,111	4.3	167,653	10.3	35,850	21.4	372,339	22.9
Moderate	145,292	14.9	304,074	18.7	31,804	10.5	259,967	16.0
Middle	326,569	33.4	519,894	31.9	32,679	6.3	296,158	18.2
Upper	462,255	47.2	628,650	38.6	26,486	4.2	700,511	42.9
NA	1,856	0.2	8,704	0.5	1,589	18.3		
Total	978,083	100.0	1,628,975	100.0	128,408	7.9	1,628,975	100.0
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
			Less than or = \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	14,211	5.2	13,296	5.4	811	3.7	104	4.7
Moderate	43,683	16.1	39,500	16.0	3,886	17.7	297	13.5
Middle	86,299	31.9	78,443	31.8	7,248	33.1	608	27.6
Upper	124,664	46.1	113,873	46.2	9,776	44.6	1,015	46.1
NA	1,862	0.7	1,483	0.6	201	0.9	178	8.1
Total	270,719	100.0	246,595	100.0	21,922	100.0	2,202	100.0
	Percentage of Total Businesses:			91.1		8.1		0.8

*NA-Tracts without household or family income as applicable

EB’s assessment area is predominately urban and offers a large number and variety of employment opportunities. While the local economy is primarily driven by federal and local government employers, there are also diverse industries contributing to local employment opportunities, including aerospace and defense, manufacturing, healthcare services, and leisure and hospitality. The area’s largest private employers include Accenture National Securities, Inova Health Systems, The Wackenhut Corporation, Capital One Bank, Northrop Grumman International, Orbital Sciences Corporation, Marriott, McDonalds, Crosby Corporation, and Laurel Regional Hospital. Recent and historical unemployment rates since the previous evaluation are presented in the following table.

Geographic Area	November 2018	November 2019	November 2020	November 2021
Commonwealth of Virginia	2.6%	2.4%	4.8%	2.8%
Alexandria City, VA	1.9%	1.8%	6%	2.4%
Arlington County, VA	1.8%	1.6%	4.6%	2%
Fairfax County, VA	2.1%	1.9%	5.4%	2.3%
Fairfax City, VA	2%	1.8%	4.8%	2.3%
Falls Church City, VA	2 %	1.7%	3.7%	1.8%
Loudoun County, VA	2.2%	1.9%	4.6%	2.1%
State of Maryland	3.2%	3.3%	5.8%	5%
Montgomery County, MD	2.7%	2.5%	6.6%	4.3%
Prince George’s County, MD	3.5%	3.3%	9.1%	6.1%
District of Columbia	5%	4.4%	8.1%	5.7%
Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Division	2.9%	2.7%	6.5%	3.5%
Frederick-Gaithersburg-Rockville, MD Metropolitan Division	2.8%	2.6%	6.4%	4.2%

As reflected in the table, area unemployment rates have been volatile since the previous evaluation, with rates increasing in 2020 due to the national emergency concerning the coronavirus disease (COVID-19) pandemic. Since 2020, unemployment rates in the bank’s assessment area within the Commonwealth of Virginia generally normalized to pre-pandemic levels. Unemployment rates within the bank’s assessment area within the District of Columbia and the State of Maryland have decreased since 2020; however, rates remain higher than their pre-pandemic levels. Similarly, unemployment rates for the broader metropolitan divisions have decreased since 2020, but still remain higher than their pre-pandemic levels.

Officials from a local affordable housing organization were recently contacted to discuss area economic conditions and community credit needs. The officials stated that although the area is resilient due to the stability and nature of its workforce (federal government), they noted that the service industry and workers have been greatly impacted by the pandemic. The officials also noted that the substantial increase in housing prices underscores the need for more funding and developing affordable housing projects within the local area. The organization partners with local and national financial institutions who help to support the mission of the organization. The contacts indicated that area financial institutions are adequately meeting local credit needs.

Overall, discussions with the officials from the affordable housing organization and reviews of the performance evaluations of other financial institutions having a local presence indicate that community development opportunities are readily available within the bank’s assessment area. Despite a highly competitive market, the bank faces no significant constraints in taking advantage of the community development opportunities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

Ratings for the lending, investment, and service test are assigned to the institution based on performance within the assessment area. Following the FFIEC procedures, the lending test performance accounts for half of the overall rating, while the investment and service tests are equally weighted and each account for one-quarter of the overall rating. Conclusions also take into consideration relevant performance context factors.

LENDING TEST

When evaluating the bank’s performance, relevant area demographic data from the 2015 ACS and Dun & Bradstreet (D&B) business demographic data from 2019 and 2020 are used as proxies for demand. While ACS data is collected and published by the U.S. Census Bureau on an annual basis, the demographic data relied upon in this evaluation is based on ACS data that is updated once every five years. Aggregate HMDA and small business loan data from 2019 and 2020 are also considered when evaluating the bank’s performance for each year.

While aggregate HMDA and small business loan data from calendar years 2019 and 2020 were fully analyzed and considered in the evaluation, only bank and aggregate data from 2020 are presented in the assessment area tables. In instances where 2019 performance varies from the performance noted during 2020, such variance and the corresponding impact on the overall performance are discussed.

The geographic and borrower distribution performance of HMDA loans focused on performance for Home Purchase, Home Improvement, Refinancing, and Multi-family loan categories. Performance for the Not Applicable, Other Closed, and Other Line of Credit loan categories was not evaluated because not all HMDA reporters are required to report each loan category, or the category contains relatively few loans overall.

When assessing individual loan products for geographic and borrower distribution performance, primary consideration is given to the number (and corresponding percentage) of loans. When combining multiple loan products to arrive at an overall conclusion, the level of performance for each product is weighted primarily by the dollar volume that the product contributes to the overall activity considered in the evaluation.

During 2019 and 2020, EB reported approximately \$1.9 billion in HMDA loans and \$342.3 million in small business loans within its assessment area. Accordingly, the bank's HMDA lending performance is given significantly more weight than the small business lending performance when considering the bank's combined product performance. Additionally, when determining the overall performance of a product, greater weight is given to the year with the larger dollar volume for that product. For EB's HMDA lending, greater weight is given to the 2020 performance, as the bank originated \$1.2 billion in loans compared to \$766.2 million in 2019. For small business lending, greater weight is given to the 2020 performance, as the bank originated \$253.3 million in loans compared to \$89 million in 2019.

Overall, the bank's lending test performance is rated High Satisfactory based on its lending activity, assessment area concentration of lending, geographic and borrower lending distribution performances, and community development lending. The components of each test are discussed in the following sections. All conclusions take into consideration relevant performance context factors.

Lending Activity:

Combined residential real estate and small business lending activity from 2019 and 2020 from the bank's reported loan data is detailed in the following table.

Summary of Lending Activity

Loan Type	#	%	\$(000)	% of \$
Home Improvement	89	1.35	37,204	1.24
Home Purchase	1,820	27.53	758,342	25.32
Multi-Family Housing	37	0.56	540,527	18.05
Refinancing	2,780	42.06	1,251,020	41.78
Loan Purpose Not Applicable	1	0.02	1,723	0.06
Total HMDA related	4,727	72	2,588,816	86
Small Business	1,883	28.49	405,832	13.55
TOTAL LOANS	6,610	100	2,994,648	100

The bank's lending levels reflect excellent responsiveness to credit needs based on the lending activity analyzed under the Lending Test. The total number and dollar volume of loans was considered in arriving at the lending activity conclusion.

Since March 31, 2018, the bank's assets, net loans, and deposits have increased by 53.5%, 7.4%, and 61.7%, respectively. As of June 30, 2021, EB ranked 9th out of 58 institutions in local deposit market share, having 2.8% of the available Federal Deposit Insurance Corporation (FDIC) insured deposits (credit union deposits are not included) within its assessment area. According to 2020 aggregate data,

the institution ranked 39th out of 857 reporters in HMDA lending with a .6% market share and 19th out of 316 lenders in reported small business lending with a 1% market share. Similarly, in 2019, the bank ranked 42nd out of 741 reporters in HMDA lending with a .6% market share and 25th out of 219 lenders in reported small business lending with a .2% market share. All market share rankings consider originated and purchased loans.

To meet the credit needs of its assessment area, EB offers a broad range of financial products and services, including loan programs that have flexible criteria or are designed to meet special credit needs that often benefit small businesses. The following are examples of loan programs the bank utilizes in an effort to be responsive to community credit needs:

- Paycheck Protection Program (PPP) – the bank offered PPP loans designed to help businesses retain their workforce during the pandemic. During 2020, EB originated 1,358 PPP loans totaling \$244.8 million, of which 1,212 loans totaling \$210.9 million were originated within the bank’s assessment area. This is an example of EB using flexible lending products to meet credit needs within its assessment area. Given this large volume of lending, EB makes use of innovative and/or flexible lending practices in serving assessment area credit needs.
- Small Business Administration (SBA) – the bank offers SBA products that provide businesses with access to capital with terms that are more flexible than conventional financing. In addition to the aforementioned PPP loans, EB originated 49 SBA loans totaling \$28.5 million during the evaluation period.

EB also makes use of flexible loan programs to meet the credit needs of low- and moderate-income individuals within its assessment area. The bank offers Fannie Mae’s *HomeReady* and Freddie Mac’s *HomePossible* mortgage products which have low down payment requirements and cancellable mortgage insurance features designed to assist low- and moderate-income homebuyers. During the evaluation period, EB originated approximately 448 *HomeReady* loans totaling \$143.4 million and 124 *HomePossible* loans totaling \$39.4 million.

EB also operates a multifamily lending division which focuses on multifamily housing credit needs within the area via Ginnie Mae multifamily mortgage-backed securities, which allows the bank to provide permanent financing for the acquisition, rehabilitation, and construction of multifamily rental housing. Within this division, the bank can originate FHA-insured multifamily loans, package them into Ginnie Mae securities, and sell them to investors while retaining the servicing rights. Since the previous evaluation, the division has originated 44 loans totaling \$517.3 million, of which 22 loans totaling \$345.4 million facilitated affordable housing projects within the regional area, including the bank’s assessment area.

EB is one of four banks participating in Montgomery County’s *Small Business Plus!* program, which is a collaboration between Montgomery County, Maryland and community banks headquartered within the county to promote job growth through small business lending. Through this collaboration, Montgomery County has deposited \$50 million into the participating community banks – which commit an equal amount – to provide \$100 million in financing to small businesses to further promote the creation of new jobs. EB currently holds \$39.9 million in deposits that are earmarked for small business lending through this program.

Additionally, EB is one of five banks participating in the Washington Suburban Sanitary Commission’s (WSSC) *Business Investment and Growth* (BIG) program, which was developed by WSSC to assist community banks in providing capital to small businesses in Montgomery and Prince George’s Counties, Maryland. Through the program, WSSC has deposited \$16 million into the participating banks, which leverages the deposits 2:1 to provide a total of \$32 million in financing for local businesses. EB currently holds \$6 million in deposits with WSSC.

Considering relevant performance context factors such as bank size, financial condition, and local area credit needs, the bank’s overall lending activity reflects excellent responsiveness to the needs of its assessment area, and it makes extensive use of flexible lending practices.

Assessment Area Concentration:

The institution's lending activity for HMDA and small business loans from January 1, 2019, through December 31, 2020, inside and outside its delineated assessment area, is represented in the following table. The data does not include large commercial loans (loan amounts in excess of \$1 million) or any other loan type not specified.

Comparison of Credit Extended Inside and Outside of Assessment Area(s)

Loan Type	Inside				Outside			
	#	%	\$ (000)	%	#	%	\$ (000)	%
Home Purchase	1,146	63.0	538,355	71.0	674	37.0	219,987	29.0
Home Improvement	60	67.4	29,042	78.1	29	32.6	8,162	21.9
Refinancing	2,050	73.7	989,416	79.1	730	26.3	261,604	20.9
Multi-Family Housing	24	64.9	376,349	69.6	13	35.1	164,178	30.4
Loan Purpose Not Applicable	1	100.0	1,723	100.0	0	0.0	0	0.0
Other Purpose Closed/Exempt	0	0.0	0	0.0	0	0.0	0	0.0
Other Purpose LOC	0	0.0	0	0.0	0	0.0	0	0.0
Total HMDA related	3,281	69.4	1,934,885	74.7	1,446	30.6	653,931	25.3
Small Business	1,646	87.4	342,327	84.4	237	12.6	63,505	15.6
TOTAL LOANS	4,927	74.5	2,277,212	76.0	1,683	25.5	717,436	24.0

As indicated in the preceding table, a high percentage of the total number (74.5%) and dollar volume (76%) of loans have been provided to residents and businesses within the bank's assessment area.

Geographic Distribution:

EB's geographic distribution performance is considered good for HMDA and small business lending, and is considered good overall.

Distribution of HMDA Loans by Income Level of Census Tract

Washington-Arlington-Alexandria, DC-VA-MD (2020)								
Income Categories	Bank				Aggregate			
	#	%	\$ (000s)	% \$	#	%	\$ (000s)	% \$
	(581)				Home Purchase (89,596)			
Low	60	10.3	24,389	8.6	4,837	5.4	1,880,348	4.3
Moderate	100	17.2	37,846	13.4	13,875	15.5	4,953,434	11.4
Middle	187	32.2	77,535	27.4	30,568	34.2	12,773,384	29.3
Upper	234	40.3	143,115	50.6	40,032	44.9	23,945,371	55.0
	(1,498)				Refinance (229,034)			
Low	57	3.8	24,176	3.5	7,696	3.4	2,620,550	2.7
Moderate	135	9.0	48,825	7.1	23,869	10.4	7,549,766	7.8
Middle	365	24.4	141,784	20.6	68,921	30.1	25,149,427	25.9
Upper	941	62.8	474,805	68.8	128,548	56.1	61,825,475	63.6
	(33)				Home Improvement (7,111)			
Low	2	6.1	444	3.2	207	2.9	30,734	2.8
Moderate	4	12.1	849	6.0	652	9.2	76,580	7.0
Middle	7	21.2	2,445	17.4	1,808	25.4	224,435	20.4
Upper	20	60.6	10,336	73.4	4,444	62.5	770,046	69.8
	(10)				Multi-Family (349)			
Low	5	50.0	123,457	72.8	104	29.8	1,760,378	30.8
Moderate	2	20.0	8,500	5.0	77	22.1	1,160,245	20.3
Middle	1	10.0	13,400	7.9	87	24.9	1,993,498	34.9
Upper	2	20.0	24,271	14.3	81	23.2	794,309	14.0
	HMDA Totals							
Low	124	5.8	172,466	14.8	12,844	3.9	6,292,010	4.3
Moderate	241	11.2	96,020	8.2	38,473	11.8	13,740,025	9.3
Middle	560	26.1	235,164	20.2	101,384	31.0	40,140,744	27.1
Upper	1,197	55.9	652,527	55.9	173,105	53.0	87,335,201	59.0
NA*	21	1.0	10,833	0.9	836	0.3	409,871	0.3
Total	2,143	100.0	1,167,010	100.0	326,642	100.0	147,917,851	100.0

NA*-Tracts without household or family income as applicable

Within the assessment area, refinance loans were extended most frequently by the bank and aggregate reporters. By loan product, EB's home purchase performance is considered excellent in comparison to aggregate reporters, while refinance lending is considered good. Given the limited volume of home improvement and multi-family lending within the assessment area, these loan categories were given minimal weight when considering the bank's overall performance.

During 2020, the bank's total HMDA lending in low-income census tracts (5.8%) exceeds both the percentage of owner-occupied housing units located in such tracts (4.3%) and the aggregate lending level (3.9%). The bank's lending in moderate-income census tracts (11.2%) is lower than the percentage of owner-occupied housing units located in those tracts (14.9%) but is similar to the aggregate lending level (11.8%). On a combined basis, EB's performance in 2020 is considered good.

During 2019, the bank originated 1,137 HMDA loans within its assessment area totaling \$766.2 million. Of those origination, 83 (7.3%) loans totaling \$93.3 million (12.2%) were originated in low-income census tracts, while 175 (15.4%) loans totaling \$139.9 million (18.3%) were originated in moderate-income census tracts. When compared to the number of loans reported by aggregate lenders in low- and moderate-income census tracts (5% and 13.9%, respectively), and the percentage of owner-occupied units in low- and moderate-income census tracts (4.3% and 14.9%, respectively), EB's performance in 2019 is considered excellent.

On a combined basis, and after consideration of the greater weight given to its 2020 performance due to the larger dollar volume of originations in that year, EB's HMDA lending is considered good overall.

Distribution of Small Business Loans by Income Level of Census Tract

Washington-Arlington-Alexandria, DC-VA-MD (2020)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
Low	64	4.7	12,942	5.1	6,111	4.6	301,805	4.1
Moderate	247	18.0	55,657	22.0	21,225	16.0	1,233,593	16.7
Middle	389	28.4	67,635	26.7	42,890	32.3	2,456,140	33.2
Upper	651	47.5	112,952	44.6	61,791	46.6	3,369,054	45.5
NA*	20	1.4	4,137	1.6	621	0.5	37,513	0.5
Total	1,371	100.0	253,323	100.0	132,638	100.0	7,398,105	100.0

*NA-Tracts without household or family income as applicable
Loans where the geographic location is unknown are excluded from this table.

D&B data from 2020 indicates that 5.2% of all area businesses are located in low-income census tracts and 16.1% are located in moderate-income census tracts. EB’s small business lending in low-income census tracts (4.7%) is slightly less than the percentage of businesses located in low-income census tracts and approximates the aggregate level of lending (4.6%) in such tracts. The bank’s lending in moderate-income census tracts (18%) exceeds the demographic proxy and aggregate level of lending (16%) in such tracts. On a combined basis, EB’s performance in 2020 is considered good.

During 2019, the bank originated 275 small business loans within its assessment area totaling \$89 million. Of the total loans, 14 (5.1%) loans totaling \$3.9 million (4.4%) were originated in low-income census tracts, while 61 (22.2%) loans totaling \$19.3 million (21.7%) were originated in moderate-income census tracts. When compared to the percentage of loans reported by aggregate lenders in low- and moderate-income census tracts (4.4% and 15.9%, respectively), and the percentage of businesses located in low- and moderate-income census tracts (5.1% and 16.1%, respectively), EB’s performance in 2019 is considered excellent.

Since greater weight was given to its 2020 performance given the larger dollar volume of lending, on a combined basis, EB’s small business lending is considered good overall.

Distribution by Borrower Income and Revenue Size of Business:

EB’s borrower distribution performance is considered adequate for HMDA and small business lending, and is adequate overall. HMDA loans where borrower income was not reported are not included in the borrower lending distribution analysis.

Distribution of HMDA Loans by Income Level of Borrower

Washington-Arlington-Alexandria, DC-VA-MD (2020)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	HMDA Totals							
Low	92	4.5	23,008	2.5	15,064	5.6	3,472,586	3.0
Moderate	315	15.5	104,443	11.2	46,892	17.4	14,476,295	12.5
Middle	560	27.6	238,413	25.7	72,421	26.9	27,845,266	24.0
Upper	1,061	52.4	563,343	60.6	135,009	50.1	70,402,616	60.5
Total	2,028	100.0	929,207	100.0	269,386	100.0	116,196,763	100.0
Unknown	115		237,803		57,256		31,721,088	

Percentages (%) are calculated on all loans where incomes are known

During 2020, the bank’s lending to low-income borrowers (4.5%) was substantially less than the percentage of area low-income families (21.8%) and slightly lags the aggregate lending level (5.6%). The bank’s level of lending to moderate-income borrowers (15.5%) approximates the percentage of area moderate-income families (15.7%) and lags the aggregate lending level (17.4%). Overall, the bank’s distribution of loans reflects adequate penetration among low- and moderate-income borrowers during 2020.

During 2019, the bank originated 1,005 residential mortgages within its assessment area totaling \$484.4 million where borrower incomes were known. Of the total loans, 56 (5.6%) loans totaling \$12.8 million (2.6%) were originated to low-income borrowers, while 204 (20.3%) loans totaling \$64.3 million (13.3%) were originated to moderate-income borrowers. When compared to the percentage of loans reported by aggregate lenders to low- and moderate-income borrowers (7.1% and 19.7%, respectively), and the proportion of area low- and moderate-income families (21.8% and 15.7%, respectively), EB's performance in 2019 is considered good.

On a combined basis, EB's HMDA lending is considered adequate overall given the greater weight given to its 2020 performance.

Distribution of Lending by Loan Amount and Size of Business

Washington-Arlington-Alexandria, DC-VA-MD (2020)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	78	5.7	16,743	6.6	58,749	44.2	1,898,024	25.6
Over \$1 Million	75	5.5	21,966	8.7	NA	NA	NA	NA
Unknown	1,218	88.8	214,614	84.7	NA	NA	NA	NA
by Loan Size								
\$100,000 or less	641	46.8	29,520	11.7	116,778	87.8	2,347,578	31.7
\$100,001-\$250,000	404	29.5	64,947	25.6	9,033	6.8	1,455,734	19.6
\$250,001-\$1 Million	326	23.7	158,856	62.7	7,168	5.4	3,608,248	48.7
Total	1,371	100.0	253,323	100.0	132,979	100.0	7,411,560	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

D&B data from 2020 indicates that 91.1% of all local businesses have revenues that do not exceed \$1 million per year. Additionally, during 2020, 5.7% of EB's originations were to businesses with revenues of \$1 million or less. The percentage of EB's small business loans extended to businesses with revenues of \$1 million or less was impacted by a large volume of loans for which borrower revenue was unknown. As noted in the table, of the small business loans originated within its assessment area during 2020, 1,218 (88.8%) loans totaling \$214.6 million (84.7%) were reported with unknown revenue. Of its 1,371 total small business loans, the bank extended 1,212 (88.4%) loans totaling \$210.9 million (83.2%) under the PPP, which was an SBA-backed loan program designed to help businesses keep their workforce employed during the coronavirus pandemic crisis. As part of the program, lenders were not required to consider borrower revenue as underwriting criteria; consequently, the majority of PPP loans were reported with unknown revenue. Additionally, during 2020, only 159 small business loans totaling \$42.5 million were non-PPP loans, and of those loans, where revenue was known, 78 (49.1%) loans totaling \$16.7 million (39.3%) were extended to businesses having annual revenue of \$1 million or less. While the bank's PPP lending activity can be parsed from its reported loan data and used as performance context to explain the large percentage of loans for which revenue is not known, PPP data cannot be parsed from the aggregate lending data which limits the usefulness of comparing the bank's 2020 performance to 2020 aggregate lending levels.

In reviewing the bank's small business lending by loan size, within the three loan size categories, the bank's largest origination volume occurred in the \$100,000 or less category (641 loans – 46.8%) followed by the category of loans greater than \$100,000 but less than \$250,000 (404 – 29.5%). Within the assessment area, loans in these size categories are likely to have the greatest impact for small and very small businesses, and of EB's total originations in 2020, 76.3% (1,045 loans) fell within these loan size categories. After consideration of the large volume of PPP loans originated during 2020, the proportion of loans to businesses with revenues of \$1 million or less (when revenues were known), and the proportion of loans made in amounts of \$100,000 or less or between \$100,000 and \$250,000, EB's performance is considered adequate.

During 2019, the bank originated 275 small business loans totaling \$89 million, and revenues were known for 269 of the loans. Of the bank's originations, 42.9% were made to businesses with revenues of \$1 million or less. During 2019, aggregate data indicates that 49.7% of all small business loans were originated to businesses with revenues of \$1 million or less. While the proportion of bank loans originated to businesses with revenues of \$1 million or less is less than the corresponding aggregate lending level, the performance level is considered adequate.

Overall, EB's borrower distribution by loan amount and size of business is considered adequate.

Community Development Lending:

Information from individuals knowledgeable of the local market area and a review of the performance evaluations of other financial institutions having a local presence indicate that a variety of community development opportunities are available within this assessment area, and the bank's capacity for additional lending, including community development lending, is not constrained.

EB is a leader in providing loans that have a qualified community development purpose. During the evaluation period, the bank originated 78 community development loans totaling \$618.9 million within the assessment area. While the evaluation period of the current examination is approximately 75% longer than the evaluation period of the previous examination, the bank's number and volume of community development lending outpaces the increase in time between the evaluation periods from the previous examination to the current examination. The evaluation period of the previous examination was approximately 2.4 years, and the bank extended 35 community development loans totaling \$294.4 million during that time period, representing a significant increase in the number (123%) and dollar volume (110.2%) of qualified community development loans extended within the assessment area, with the majority of loans meeting affordable housing needs within the market.

Qualified community development loans include:

- Fifty seven loans totaling \$355.9 million to various investors financing affordable multifamily housing projects within the bank's assessment area.
- Sixteen loans totaling \$144.4 million to organizations who provide services benefiting low-and moderate-income individuals within the bank's assessment area, including free or low-cost healthcare, food and shelter, workforce readiness training, financial literacy education, and after-school care. One loan was extended to refinance the debt of a school located in a low-income census tract where the majority of students are from low- and moderate-income households.
- Four loans totaling \$75.6 million to various businesses who will utilize the funds to develop or expand commercial space and will create numerous long-term jobs within the bank's assessment area.
- Two loans totaling \$43 million were extended to an investor to develop commercial property located in a census tract that is designated as an Opportunity Zone, and is estimated to create 212 new jobs to the area.

INVESTMENT TEST

EB's level of responding to community development needs through its investment activities is considered Outstanding. As of December 31, 2021, the bank reported \$11.8 billion in total assets and held approximately \$2.6 billion in securities. As of the date of this evaluation, EB held 44 qualified investments totaling approximately \$122.4 million and representing approximately 1% of total assets and 4.7% of total securities. The dollar volume of qualified investments has nearly tripled since the previous evaluation (\$41.5 million), primarily attributed to investments purchased during the previous period that support affordable housing initiatives within the assessment area.

Qualified community development investments include:

- 13 pools of mortgage-backed loans totaling \$30.4 million issued by the Federal National Mortgage Association (FNMA). The mortgage loans were made to low- and moderate-income borrowers or areas within the bank's assessment area.
- Nine pools of mortgage-backed loans totaling \$25.6 million issued by Federal Home Loan Mortgage Corporation (FHLMC). The mortgage loans were made to low- and moderate-income borrowers or areas within the bank's assessment area.
- Six pools of mortgage-backed loans totaling \$2.6 million issued by Ginnie Mae. The mortgage loans were made to low- and moderate-income borrowers or areas within the assessment area.
- Four equity investments totaling \$25 million in R4 Housing Partners Funds V and VIII, as well as R4 Metro Housing Partners and Silver Spring Housing, which facilitate the acquisition and development of affordable multifamily housing within the assessment area. The bank has committed an additional \$6.9 million that has not been funded.
- Four equity investments totaling \$4.2 million in small business investment corporations, Pharos Capital Partners, Farragut Capital Partners and Enlightenment Capital Solutions, which facilitate investments in small businesses nationwide, including companies located within the bank's assessment area. The bank has committed an additional \$3.6 million that has not been funded.
- Two municipal bonds totaling \$1.7 million issued by the Montgomery County Housing Opportunities Commission (HOC) which funds the development of affordable housing for low- and moderate-income individuals within the assessment area.
- Two municipal bonds totaling \$1.5 million issued by the Fairfax County Economic Development Authority, which facilitate the construction of affordable senior housing and a community center that provides services to low- and moderate-income seniors within the assessment area.
- One municipal bond totaling \$2.3 million issued by the Maryland Department of Housing and Community Development, which supports mortgage loans for borrowers with limited incomes throughout the state.
- One tax revenue bond issued by the District of Columbia totaling \$12.1 million to finance improvements and related capital expenditures for Hyde Leadership Public Charter School of Washington, D.C., where 95% of the students are from low- and moderate-income households.
- One municipal bond totaling \$8.5 million issued by the Virginia State Housing Development Authority, which facilitates the development of affordable housing for low- and moderate-income residents within the Commonwealth of Virginia.
- One equity investment in the Hudson Housing Tax Credit Fund totaling \$8.4 million which facilitates the development of The Woods at Brambleton, a 202-unit affordable housing apartment building located in the bank's assessment area.

In addition, the bank made 30 qualified donations totaling \$215,950 during the evaluation period to local organizations that promote affordable housing and assist low- and moderate-income residents within the bank's assessment area.

SERVICE TEST

The bank's performance under the service test is rated High Satisfactory. Delivery systems, branch locations, and hours of operation are considered accessible and convenient to all portions of the assessment area. Additionally, bank employees provided a relatively high level of support to organizations that provide community development services throughout the bank's assessment area given the size, location, and financial capacity of the institution.

Retail Services:

Automated teller machines (ATMs), bank-by-phone, mobile and internet banking are available, offering 24-hour account access. The bank offers free access to EB ATMs, mobile, and internet banking services. The bank also offers low- or no-cost deposit accounts for small businesses, while consumer deposit accounts generally have minimum balance or transaction requirements to avoid monthly service fees.

Branch locations are considered reasonably accessible to all portions of the assessment area. The institution operates 17 full-service branch offices within the assessment area, of which none are located in low-income census tracts, four (23.5%) in moderate-income census tracts, and the remaining are located in middle- and upper-income census tracts. The absence of branches in low-income census tracts is below the percentage of low-income tracts (11.3%) and households located in such tracts (10.3%); however, the distribution of branches in moderate-income tracts (24%) exceeds the percentage of moderate-income tracts (19.8%) and households located in such tracts (18.7%).

EB's business hours and services offered do not vary in a way that inconveniences low- and moderate-income individuals or areas. Branch offices generally have consistent hours and availability across the assessment area; all locations are open until 4:00 p.m. Monday through Thursday and until 5:00 p.m. on Fridays. Four branch offices are open on Saturdays from 9:00 a.m. until noon; however, none are located in a moderate-income census tract. Of the four branch offices offering Saturday hours, two (Park Potomac and Merrifield) are within two miles of a moderate-income census tract and one (Chantilly) is approximately one-half mile from a moderate-income census tract.

Changes in branch locations during the evaluation period have not adversely affected low- and moderate-income individuals or areas. Since the previous evaluation, the bank closed and consolidated three branch locations (Rosslyn, Reston, and Dulles Town Center); however, none of the branches were located in low- or moderate-income census tracts.

Community Development Services:

The bank and its employees participate in a relatively high level of community development service activities benefiting local organizations within the assessment area. Bank directors, officers, and employees serve on the board of directors, assist with fundraising, or provide financial education or expertise to 32 organizations, including 19 that provide community services to low- and moderate-income individuals, 10 that support small businesses and facilitate economic development, and three that promote affordable housing. Examples of these activities include but are not limited to the following:

- A bank employee serves on the board of directors for the Hearth Foundation, an organization that administers affordable housing properties within the bank's assessment area.
- A bank employee serves on the board of directors for Housing Unlimited, Inc., an organization that provides affordable housing for low- and moderate-income individuals within the bank's assessment area.
- Two bank employees serve on the loan committees of the Business Finance Group – CDC, which provides lending solutions for small businesses primarily through SBA 401 loan programs.
- One bank employee served on the board of directors and provided financial expertise to the Montgomery County Economic Development Corporation, which promotes area economic development, recruits and retains local businesses, and provides resources and support to small businesses.
- One bank employee serves on the board of directors for Latin American Youth Center, which empowers low-income youth to achieve a successful transition to adulthood through academic, job readiness, safe housing, and wellness programs that address their social, academic, and career needs. The organization serves over 4,000 youth and families annually from Washington DC, Montgomery and Prince George's County, Maryland.
- One bank employee serves on the board of directors for Devotion to Children, a local nonprofit organization that provides access to affordable education and childcare programs for children from economically disadvantaged families.

In addition, the bank participates in the following community development service activities that benefit low- and moderate-income individuals:

- Several employees participate in the EagleBank Foundation, which provides charitable contributions to local hospitals and community organizations dedicated to cancer research and treatment, as well as other nonprofit organizations that serve low- and moderate-income individuals throughout the Washington, DC metropolitan area.
- The bank partners with the Federal Home Loan Bank of Atlanta (FHLBA) to offer down-payment and closing cost assistance grants up to \$7,500 for first-time homebuyers, and up to \$10,000 for community partners such as law enforcement, firefighters, education and healthcare employees. During the review period, the bank assisted 228 borrowers obtain a total of \$1.3 million in assistance through the FHLBA within the bank's assessment area.
- The bank participates in the Maryland, District of Columbia, and Virginia Interest on Lawyer Trust Account (IOLTA) programs. The programs utilize interest from lawyers' trust accounts to provide civil legal aid to low- and moderate-income citizens. Currently, EB holds a total of 255 IOLTA accounts (131 in Maryland, 28 in Virginia, and 96 in the District of Columbia).
- The bank participates in the Maryland Affordable Housing Trust Account (MAHT) program, which requires the bank to pay interest on the deposit accounts of law firm clients that would otherwise be non-interest bearing. Interest proceeds from the accounts are used to support affordable housing programs in Maryland. The bank currently holds 51 trust accounts.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB, among other things, primary examination and enforcement authority over insured depository institutions with total assets of more than \$10 billion when assessing compliance with the requirements of Federal consumer financial laws, including EB. The Federal Reserve, however, retains authority to enforce compliance with the bank's CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation from January 22, 2018, through March 28, 2022, the Federal Reserve did not cite violations involving discriminatory or other illegal credit practices that adversely affected the Federal Reserve's evaluation of the bank's CRA performance.

APPENDIX A – 2019 DISTRIBUTION TABLES

2019 Geographic Distribution Tables

Distribution of HMDA Loans by Income Level of Census Tract

Washington-Arlington-Alexandria, DC-VA-MD (2019)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
	(560)				Home Purchase (89,907)			
Low	51	9.1	18,883	7.5	4,942	5.5	1,720,355	4.2
Moderate	108	19.3	38,309	15.3	13,868	15.5	4,537,050	11.1
Middle	192	34.3	70,987	28.3	30,433	33.9	11,818,711	29.0
Upper	209	37.3	122,957	48.9	40,464	45.1	22,705,563	55.7
	(534)				Refinance (79,531)			
Low	26	4.9	10,422	3.6	3,670	4.6	1,138,800	3.4
Moderate	59	11.0	24,970	8.5	10,093	12.7	2,972,966	8.9
Middle	137	25.7	59,661	20.4	24,960	31.4	8,845,297	26.6
Upper	312	58.4	197,578	67.5	40,808	51.3	20,344,740	61.1
	(27)				Home Improvement (8,473)			
Low	3	11.1	2,373	15.9	301	3.6	38,598	3.4
Moderate	4	14.8	1,480	9.9	824	9.7	77,870	6.9
Middle	7	25.9	3,408	22.8	2,473	29.2	263,462	23.3
Upper	13	48.2	7,707	51.4	4,875	57.5	750,398	66.4
	(14)				Multi-Family (348)			
Low	3	21.4	61,571	29.8	98	28.2	666,430	10.3
Moderate	4	28.6	75,171	36.4	84	24.1	1,871,383	28.8
Middle	3	21.4	9,513	4.6	72	20.7	2,158,247	33.3
Upper	4	28.6	60,466	29.2	94	27.0	1,794,246	27.6
	HMDA Totals							
Low	83	7.3	93,249	12.2	9,011	5.0	3,564,183	4.4
Moderate	175	15.4	139,930	18.3	24,869	13.9	9,459,269	11.5
Middle	339	29.8	143,569	18.7	57,938	32.5	23,085,717	28.2
Upper	538	47.3	388,708	50.7	86,241	48.4	45,594,947	55.6
NA*	2	0.2	696	0.1	411	0.2	223,703	0.3
Total	1,137	100.0	766,152	100.0	178,470	100.0	81,927,819	100.0

NA*-Tracts without household or family income as applicable

Distribution of Small Business Loans by Income Level of Census Tract

Washington-Arlington-Alexandria, DC-VA-MD (2019)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
Low	14	5.1	3,878	4.4	5,531	4.4	140,970	3.7
Moderate	61	22.2	19,290	21.7	19,856	15.9	615,182	16.1
Middle	60	21.8	20,413	22.9	39,609	31.7	1,220,636	31.9
Upper	136	49.5	43,448	48.8	59,187	47.5	1,827,228	47.8
NA*	4	1.4	1,975	2.2	586	0.5	20,949	0.5
Total	275	100.0	89,004	100.0	124,769	100.0	3,824,965	100.0

*NA-Tracts without household or family income as applicable

Loans where the geographic location is unknown are excluded from this table.

2019 Borrower Distribution Tables

Distribution of HMDA Loans by Income Level of Borrower

Washington-Arlington-Alexandria, DC-VA-MD (2019)								
Income Categories	Bank				Aggregate			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
HMDA Totals								
Low	56	5.6	12,832	2.6	10,623	7.1	2,236,806	3.5
Moderate	204	20.3	64,276	13.3	29,405	19.7	8,490,655	13.5
Middle	246	24.5	105,035	21.7	38,489	25.7	14,133,373	22.4
Upper	499	49.6	302,285	62.4	70,979	47.5	38,181,600	60.6
Total	1,005	100.0	484,428	100.0	149,496	100.0	63,042,434	100.0
Unknown	132		281,724		28,974		18,885,385	

Percentages (%) are calculated on all loans where incomes are known

Distribution of Lending by Loan Amount and Size of Business

Washington-Arlington-Alexandria, DC-VA-MD (2019)								
by Revenue	Bank				Aggregate*			
	#	%	\$(000s)	% \$	#	%	\$(000s)	% \$
\$1 Million or Less	118	42.9	33,211	37.3	62,354	49.7	1,231,082	32.1
Over \$1 Million	151	54.9	52,899	59.4	NA	NA	NA	NA
Unknown	6	2.2	2,894	3.3	NA	NA	NA	NA
by Loan Size	Bank				Aggregate*			
\$100,000 or less	78	28.4	4,651	5.2	119,612	95.3	1,698,346	44.2
\$100,001-\$250,000	82	29.8	14,662	16.5	2,865	2.3	496,629	12.9
\$250,001-\$1 Million	115	41.8	69,691	78.3	2,969	2.4	1,644,538	42.9
Total	275	100.0	89,004	100.0	125,446	100.0	3,839,513	100.0

* No data is available for Aggregate loans with Revenues over \$1 million and those with Unknown revenues

APPENDIX B - GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - (A) Rates of poverty, unemployment, and population loss; or
 - (B) Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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