



# SAN DIEGO CITY-COUNTY REINVESTMENT TASK FORCE

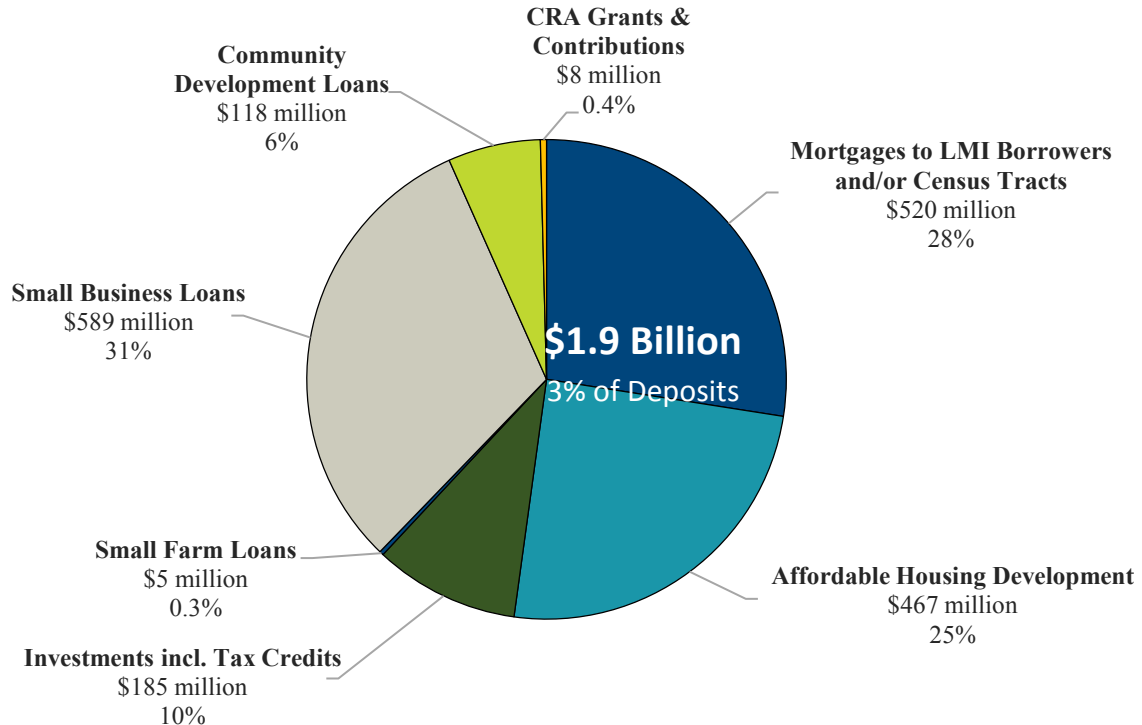


## 2019 San Diego County Community Investment Report

The City-County Reinvestment Task Force is tasked with monitoring and helping to increase bank lending, investments and grantmaking that benefit the county's low and moderate-income (LMI) residents. Each year, the Task Force surveys its member banks on their reinvestment activities in the previous calendar year and reports the totals in these charts. In 2019, those banks were Bank of America, Citibank, JPMorgan Chase, Union Bank, US Bank and Wells Fargo. Together, these banks comprise 72% of the local market as measured by local deposits. By examining their reinvestment activity, we can extrapolate to the larger market and develop a picture of countywide reinvestment for the year.

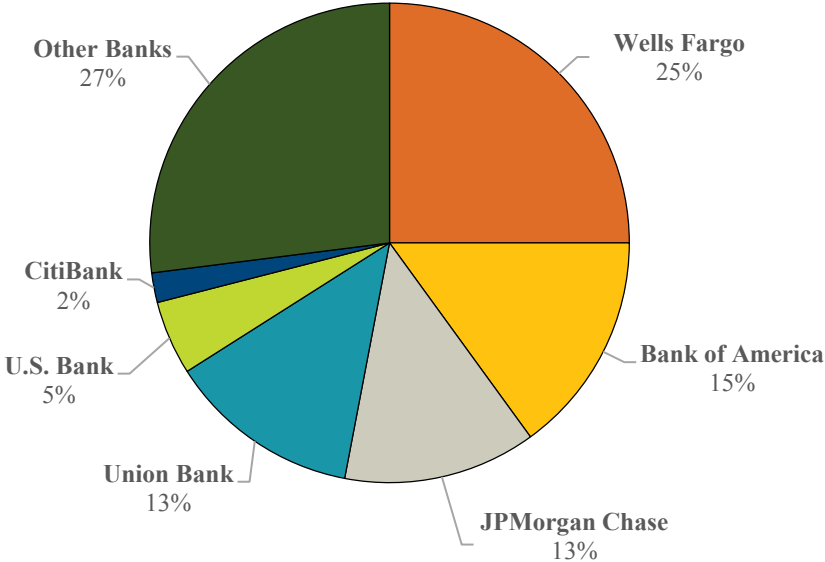
The Task Force thanks Bank of America, Citibank, JPMorgan Chase, MUFG Union Bank, US Bank and Wells Fargo Bank for their participation in this survey and commitment to reinvestment throughout San Diego County.

## 2019 Reinvestment - San Diego County

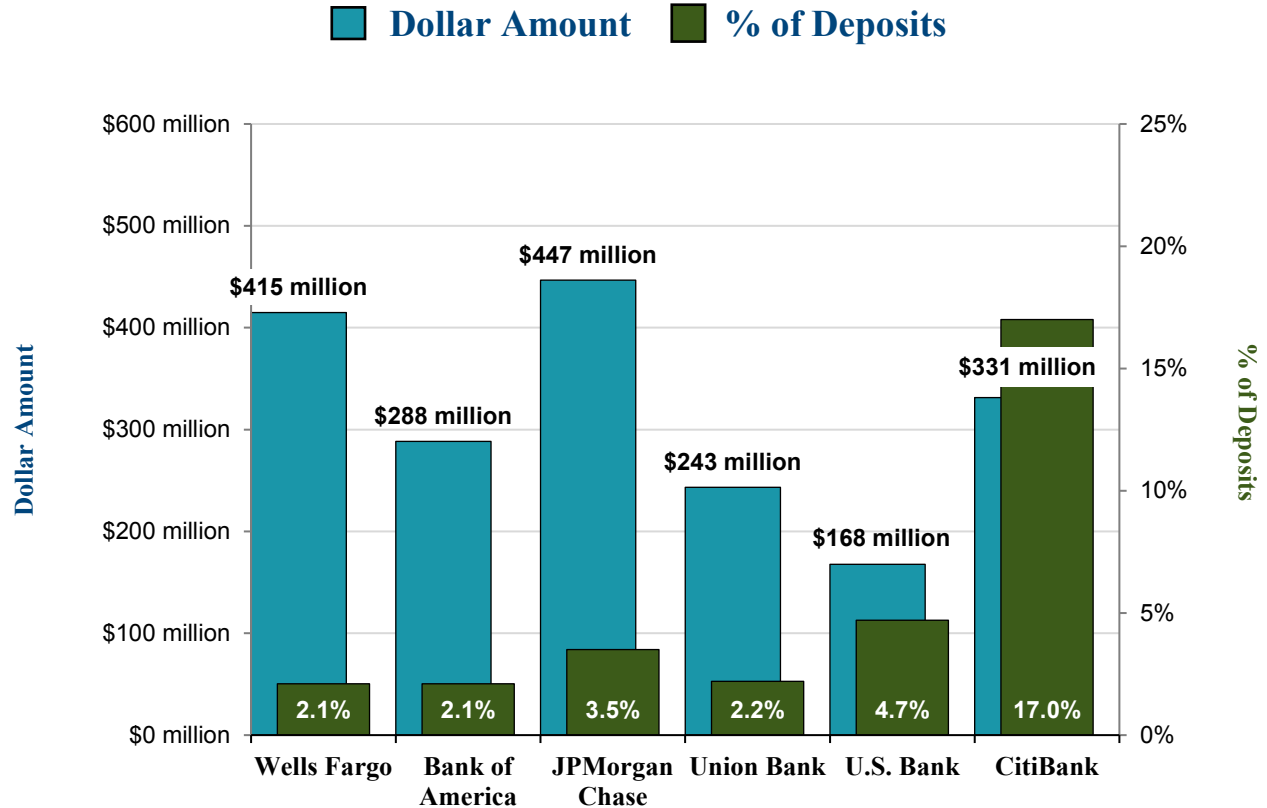


# Reinvestment Context

## 2019 San Diego County Market Share RTF Member Banks

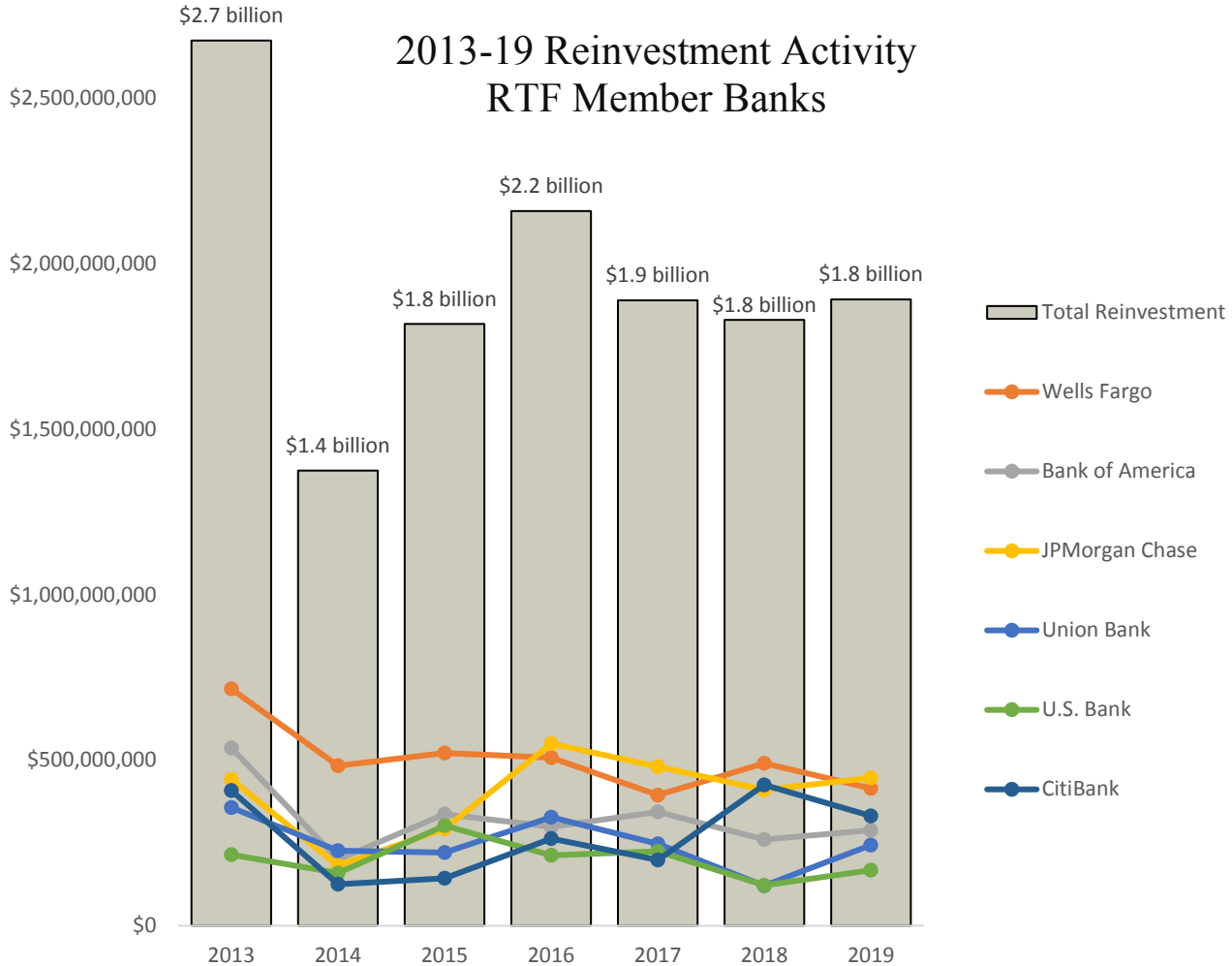


## 2019 San Diego County Reinvestment RTF Member Banks



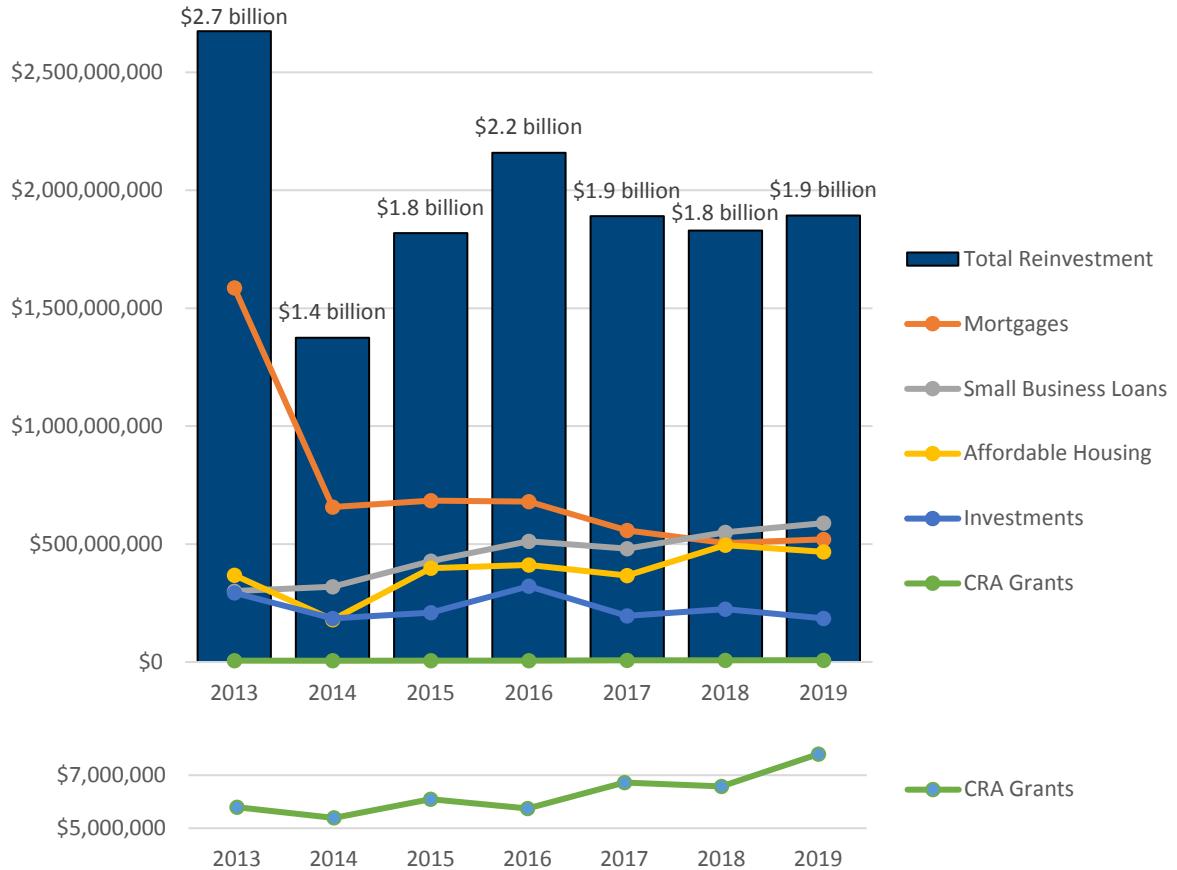
# Reinvestment Trend

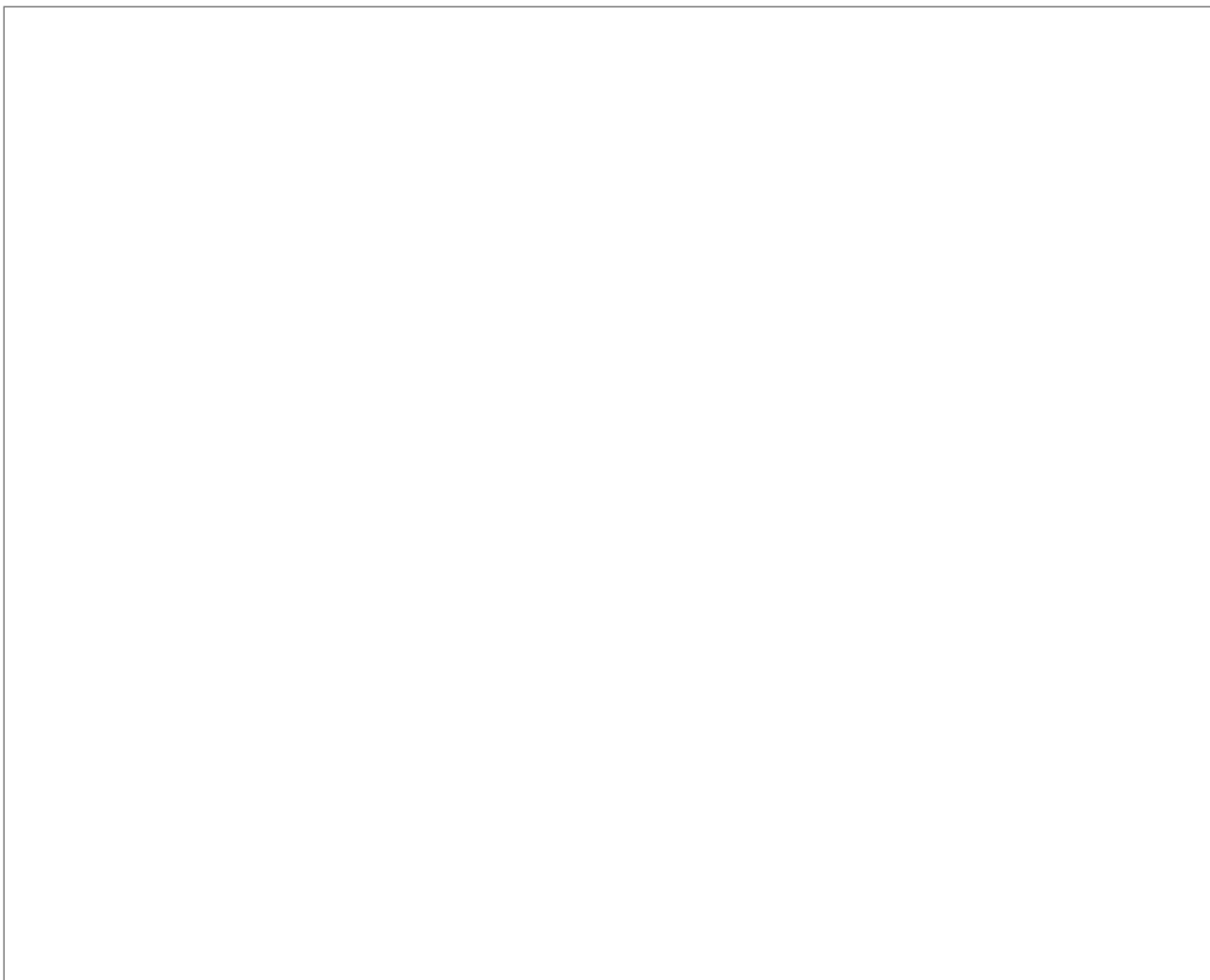
## 2013-19 Reinvestment Activity RTF Member Banks



# Reinvestment Trend

## 2013-19 Reinvestment Activity RTF Member Banks

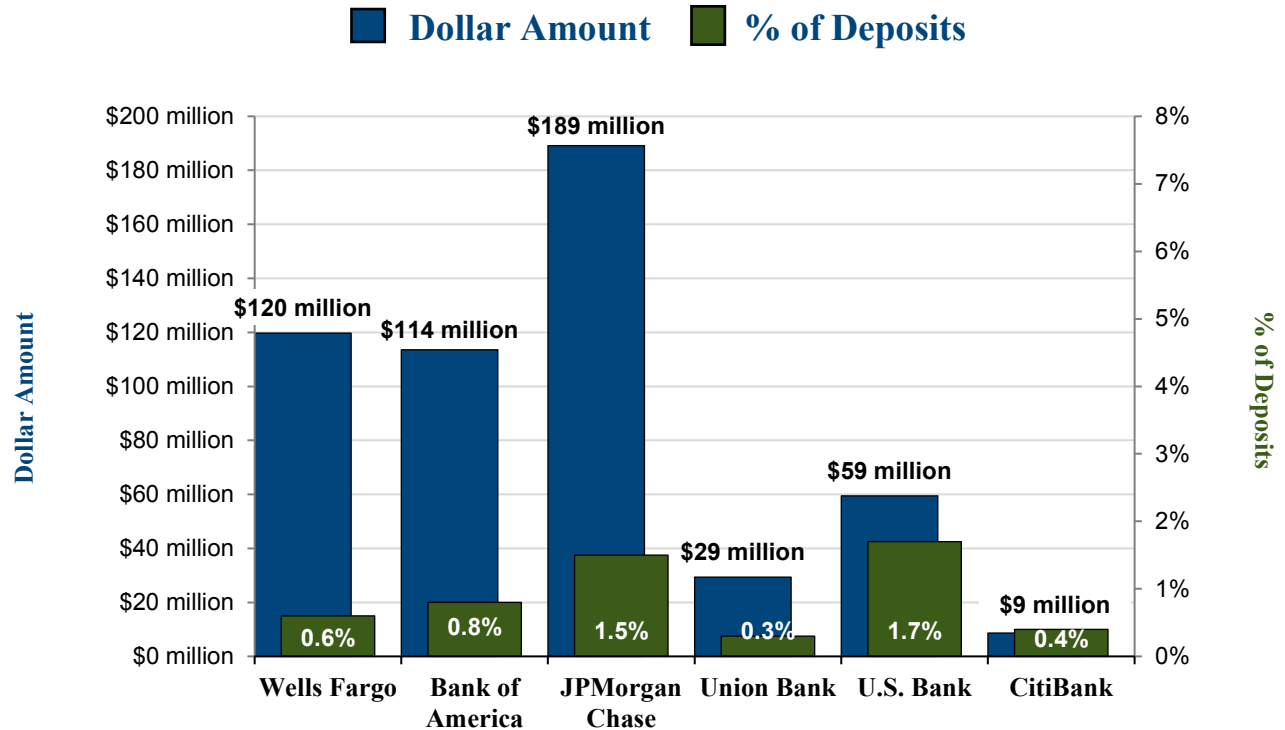




# LMI Mortgages - \$520 Million

2019 Home Purchase Mortgages, Refinancings, and Home Improvement Loans to Low and Moderate-Income Borrowers and Census Tracts – Up 3% in Dollar Value

Single Family (1-4 units), Owner-Occupied Properties

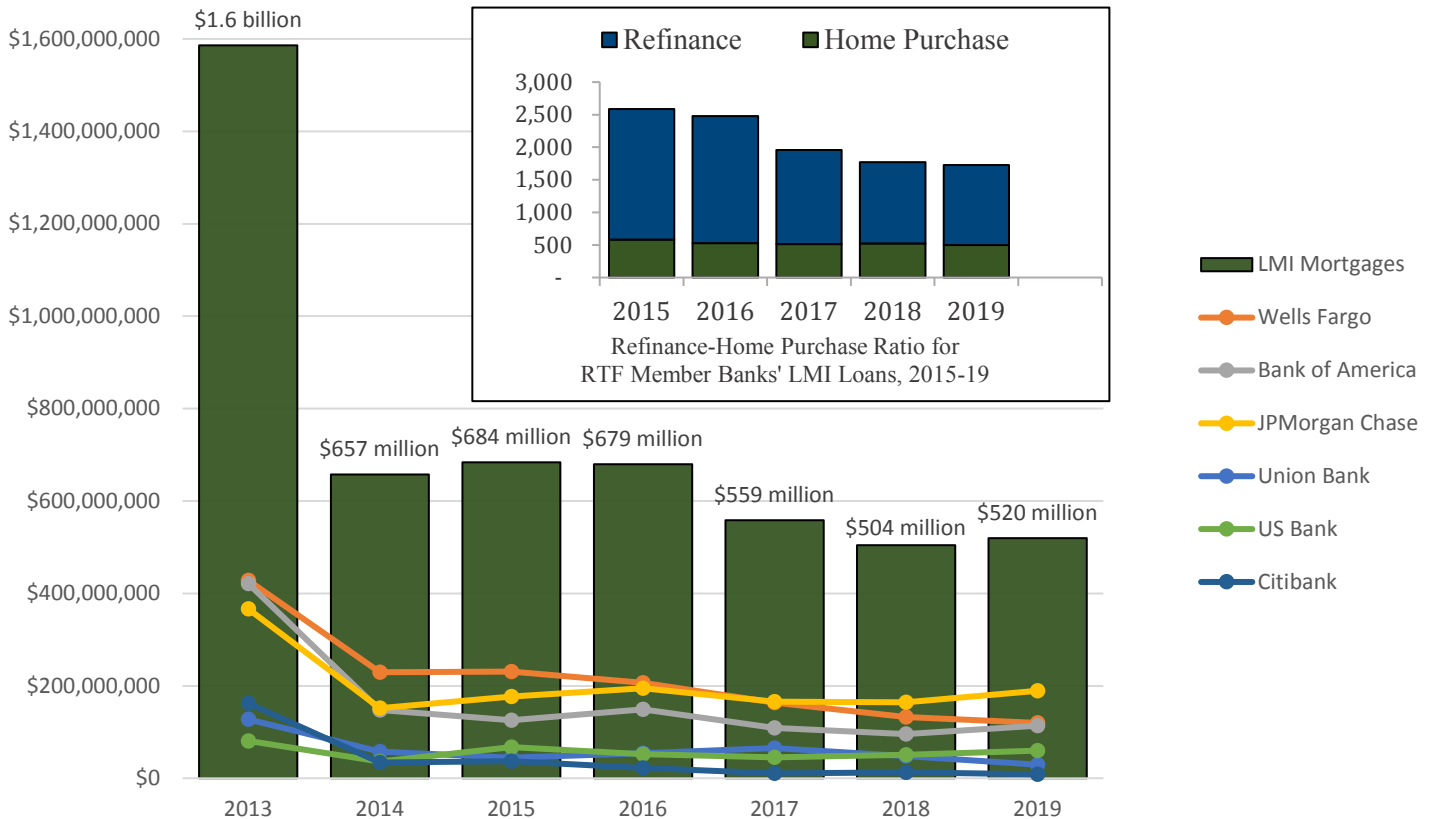




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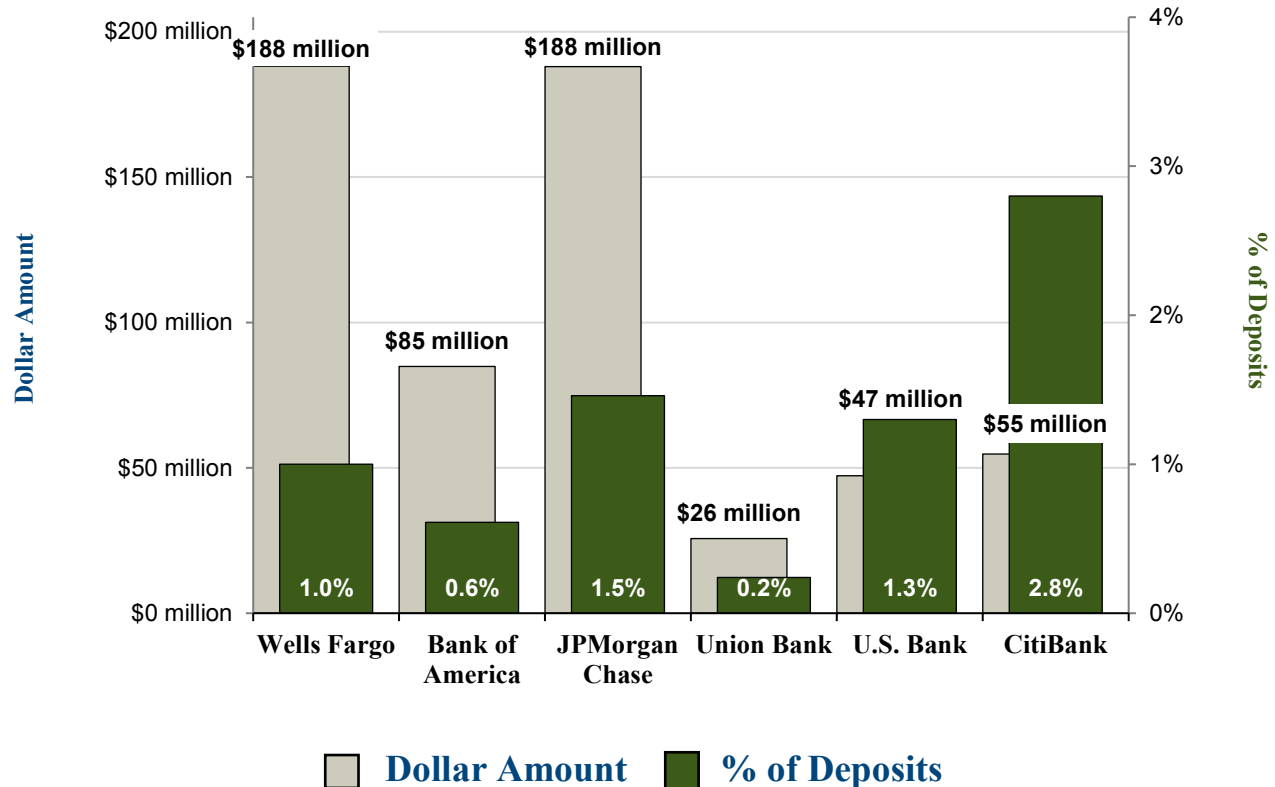
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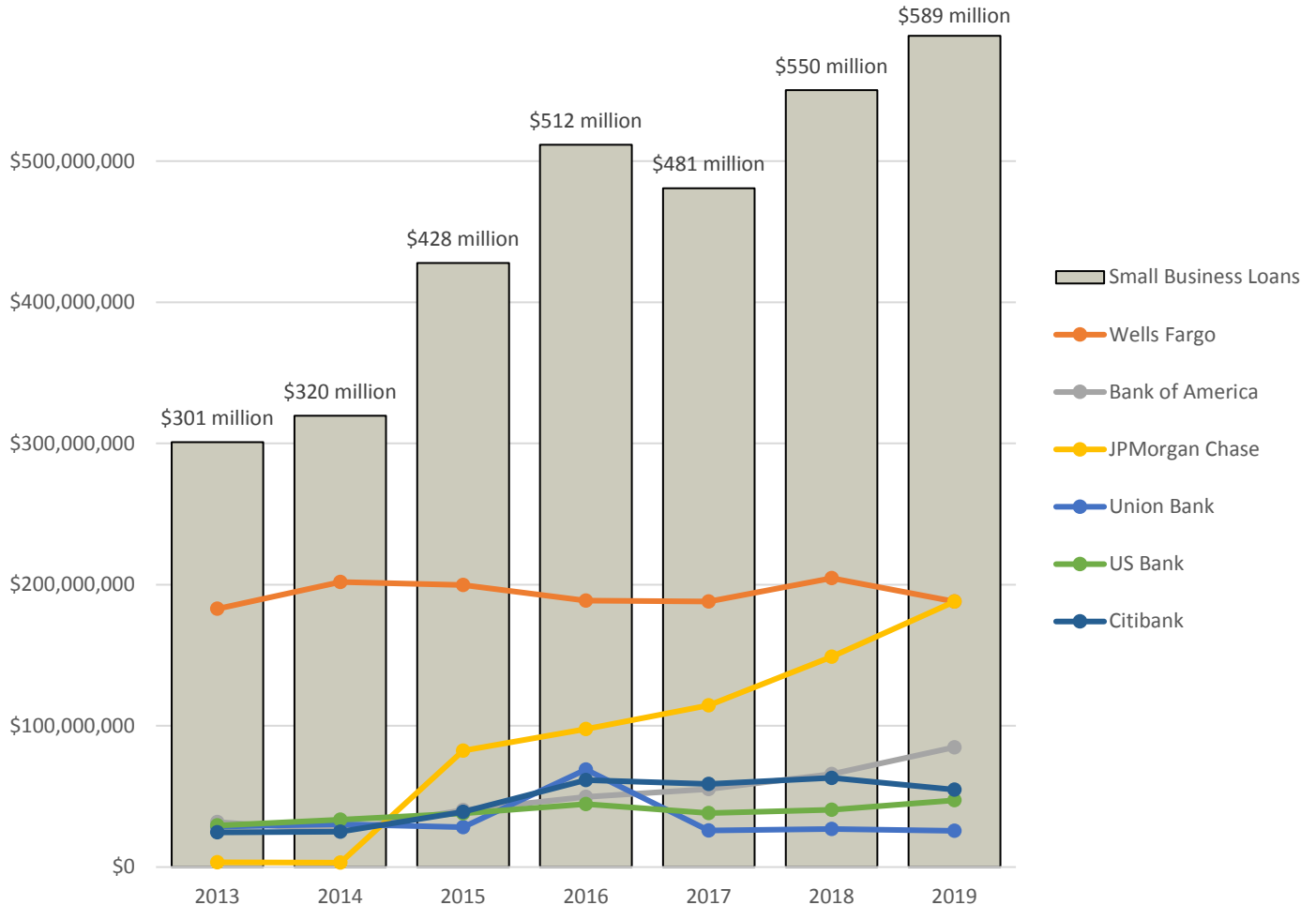
## Small Business Loans - \$589 Million

2019 Loans Under \$100,000 to Businesses With Less Than \$1 Million in Revenue – Up 7%



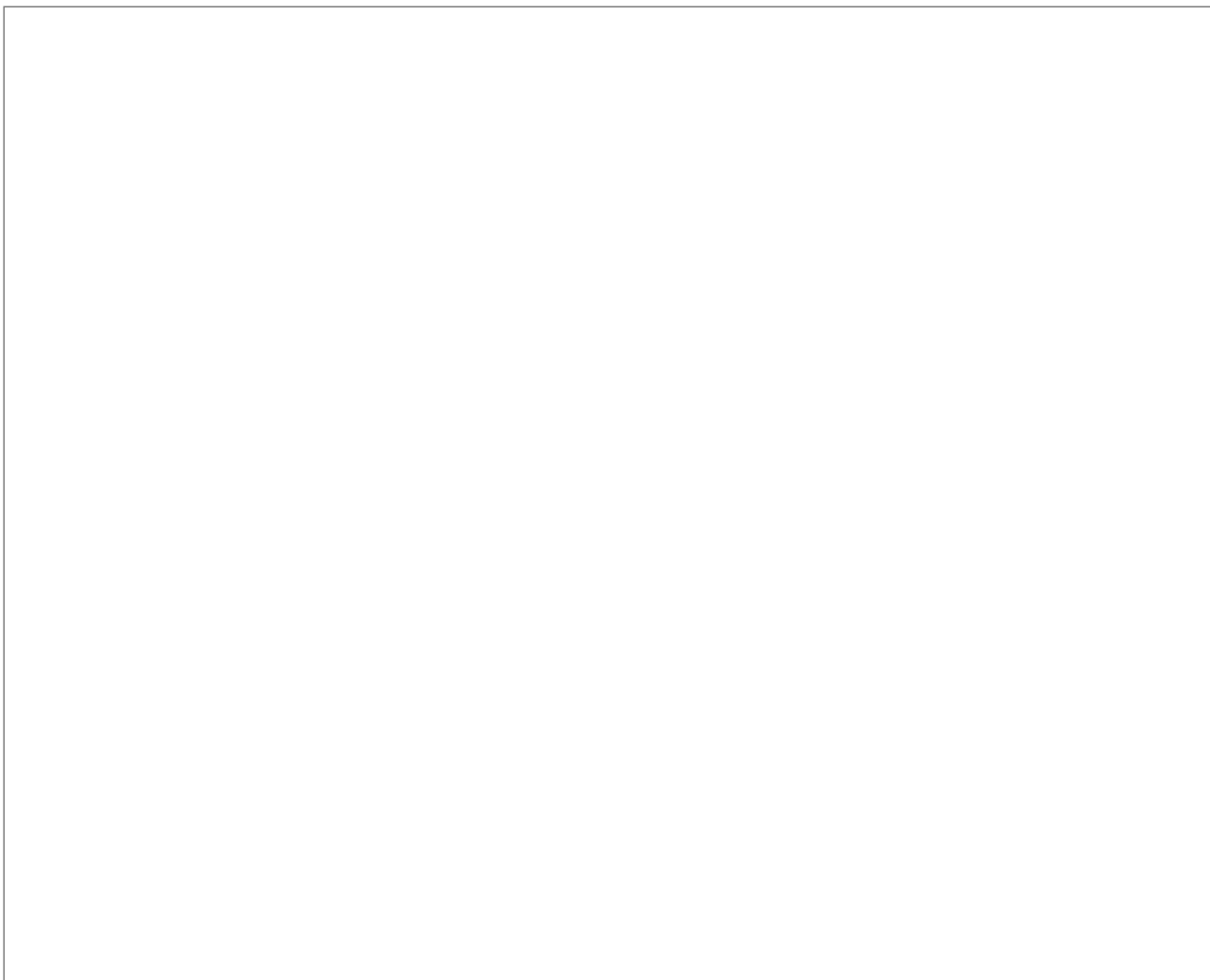
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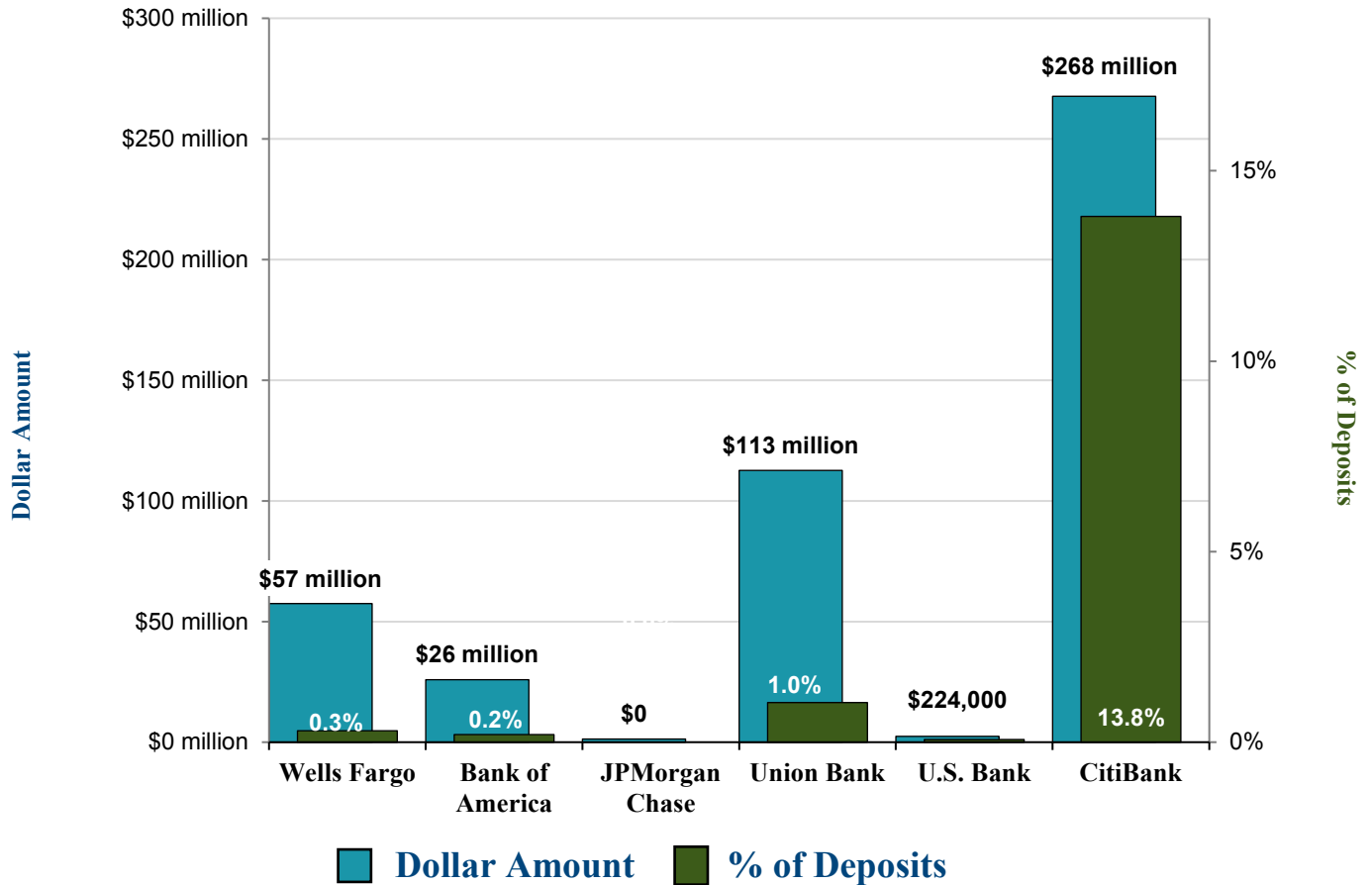
## CRA-Qualified Small Farm Loans - \$7.8 Million

	<b>Number or Count</b>	<b>% of RTF Total</b>	<b>Dollar Amount</b>	<b>% of Deposits</b>	<b>% of RTF Total</b>
<b>Wells Fargo Bank</b>	67	23.67%	\$2,864,000	0.01%	54.27%
<b>Bank of America</b>	48	16.96%	\$697,000	0.01%	13.21%
<b>JPMorgan Chase Bank</b>	126	44.52%	\$1,367,000	0.01%	25.90%
<b>MUFG Union Bank</b>	0	0.00%	\$0	0.00%	0.00%
<b>U.S. Bank</b>	42	14.84%	\$349,000	0.01%	6.61%
<b>Citibank</b>	0	0.00%	\$0	0.00%	0.00%
<b>All RTF Banks</b>	216	76.33%	\$2,413,000	0.01%	45.73%



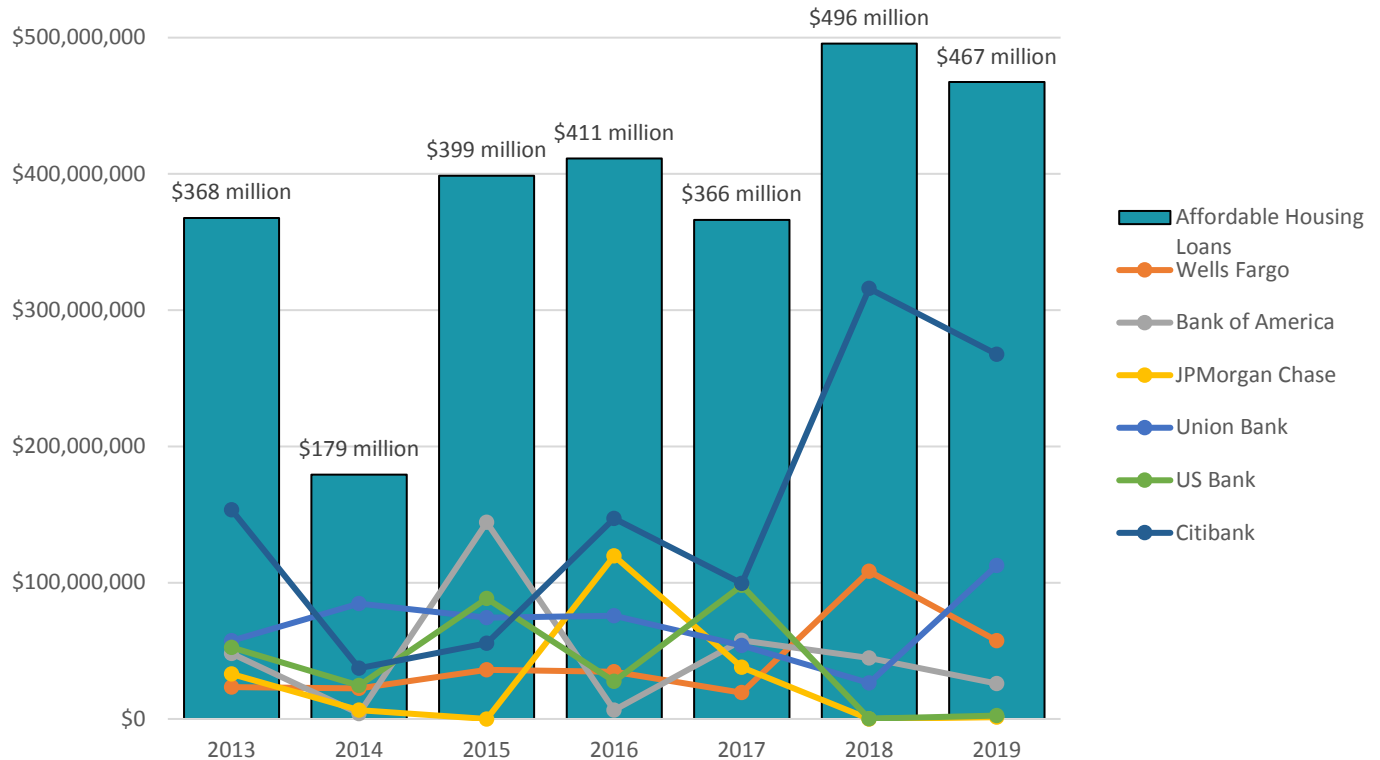
## Affordable Housing Loans - \$467 Million

2019 Loans to Income-Restricted Multifamily Housing Developments – Down 6%



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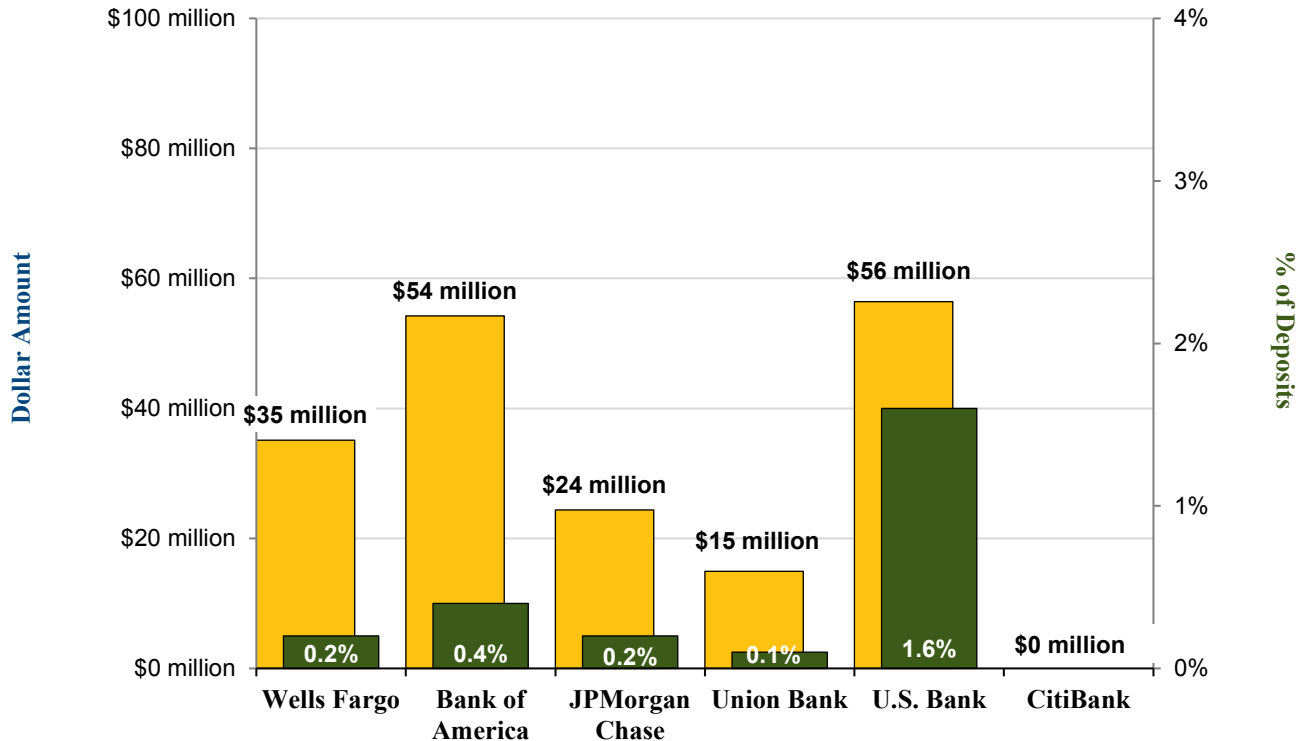
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# Tax Credits & Investments - \$185 Million

2019 CRA-Qualified Tax Credits and Investments – Down 17%

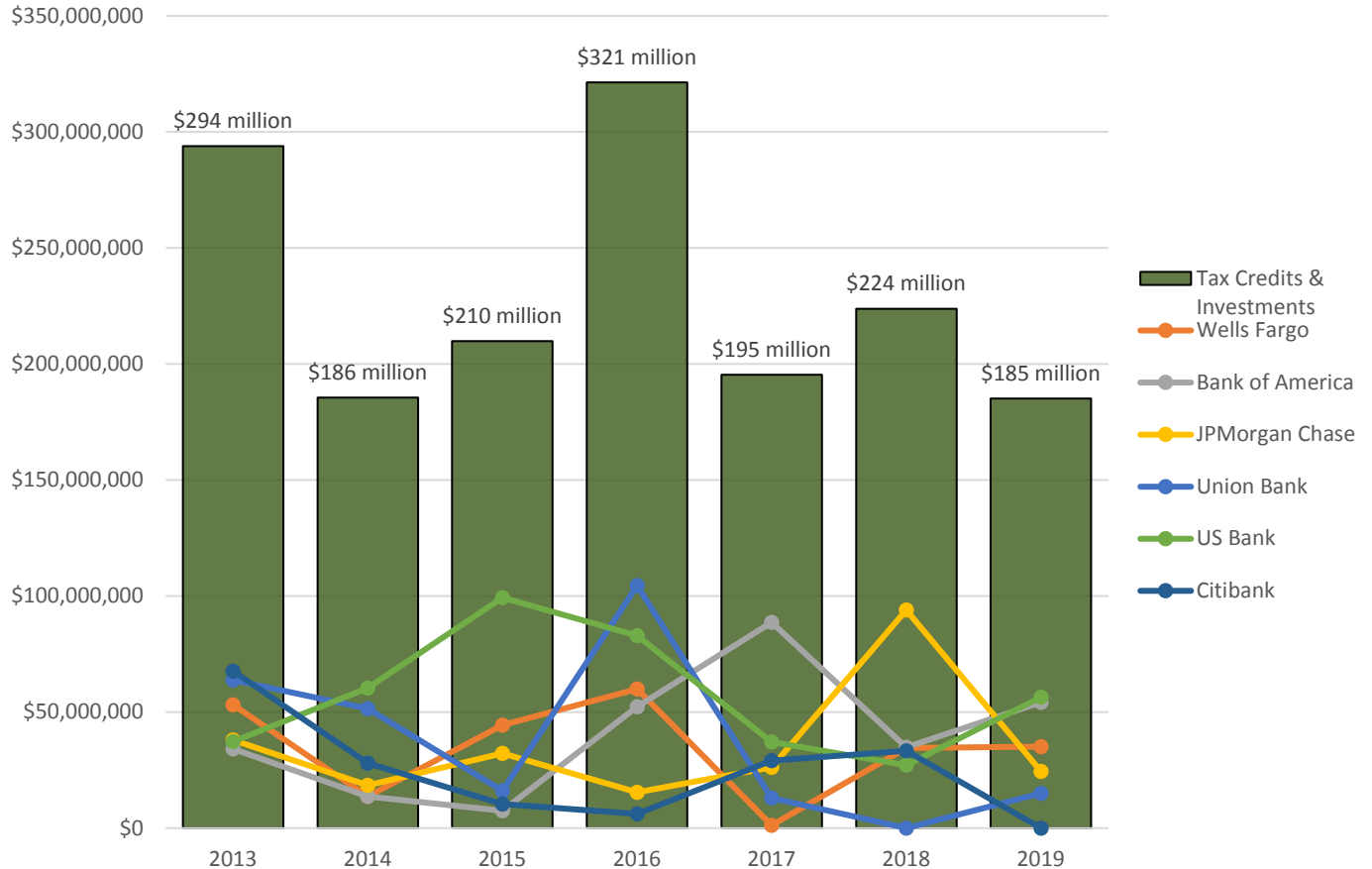
**■ Dollar Amount**   **■ % of Deposits**





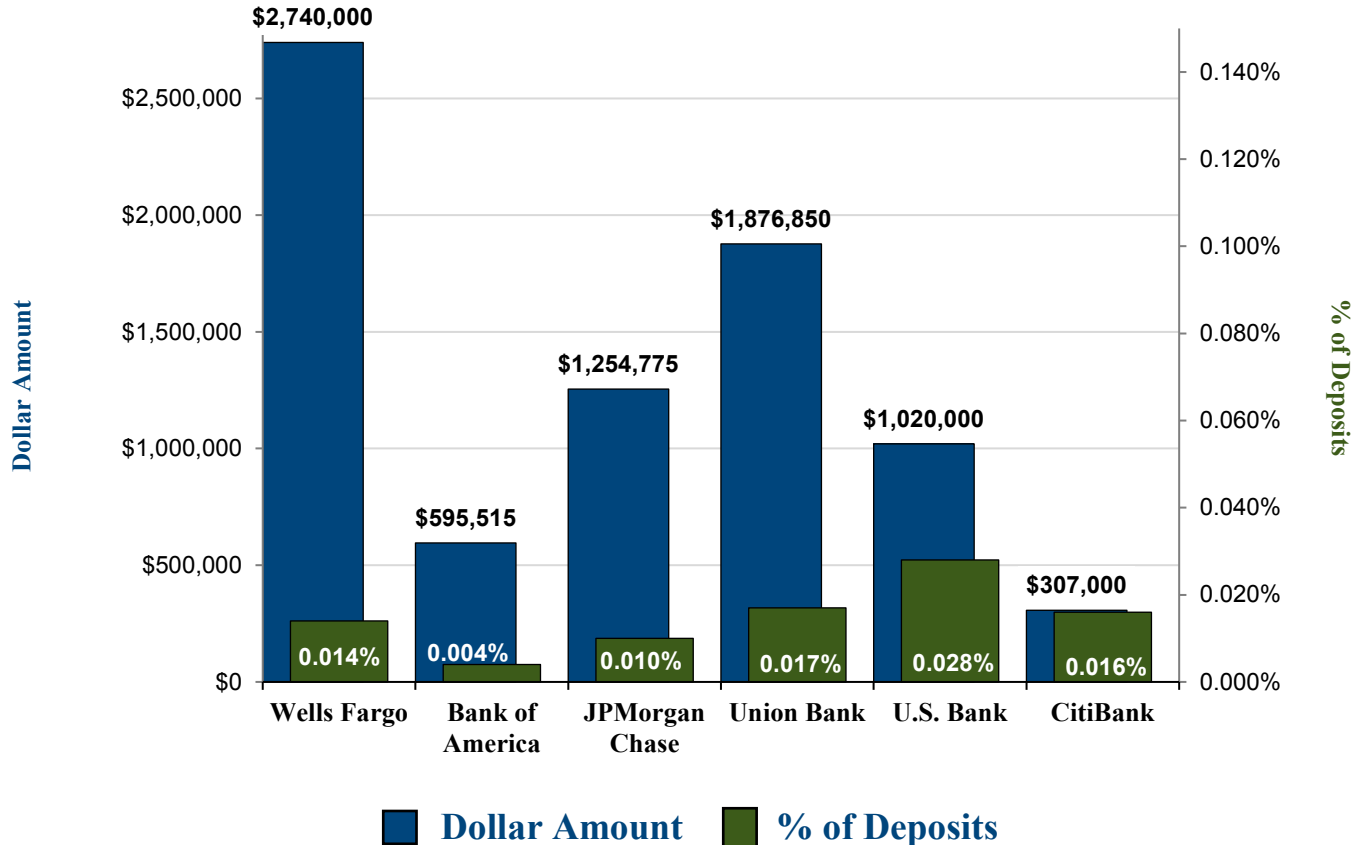
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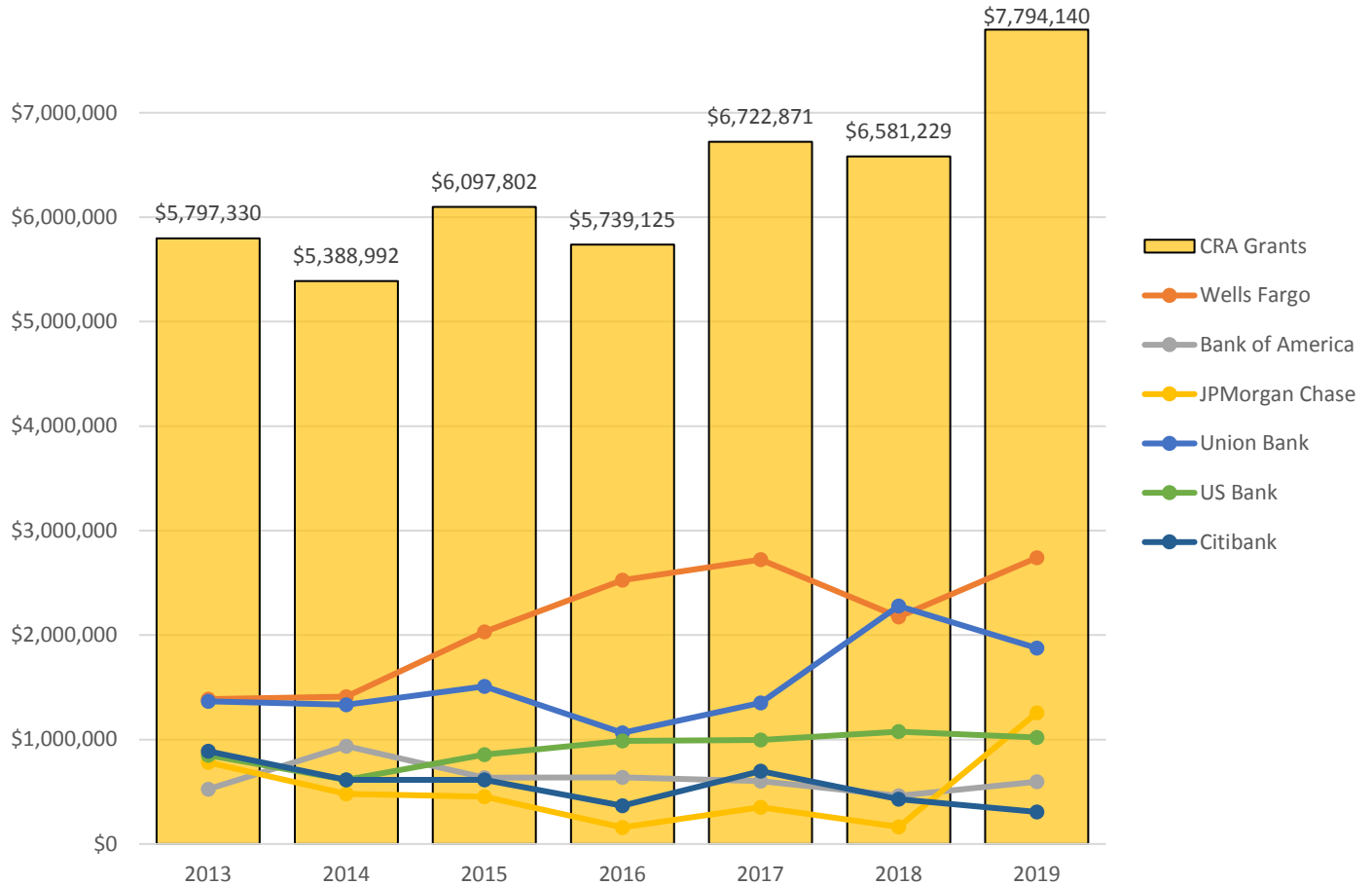
# CRA Grants & Contributions - \$7.8 Million

2019 CRA-Qualified Grants and Contributions – Up 18%



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2019 CRA-Qualified Grants and Contributions – Up 18%



	Wells Fargo	Bank of America	Chase	Union Bank	U.S. Bank	Citibank	RTF TOTALS	Median
2013 Mortgage Lending	428,161,000 7-year	421,152,427 7-year	366,354,000 7-year	127,421,000 7-year	80,862,000 7-year	162,095,000 7-year	1,586,045,427	264,224,500
2014 Mortgage Lending	229,166,000 change:	147,919,969 change:	151,660,000 change:	58,016,000 change:	36,125,000 change:	34,198,000 change:	657,084,969	102,967,985
2015 Mortgage Lending	231,096,000 -72%	125,790,000 -73%	177,055,000 -48%	44,881,000 -77%	67,523,000 -26%	37,187,000 -95%	683,532,000 -67%	96,656,500
2016 Mortgage Lending	206,333,000	149,217,351	194,794,000	54,510,000	51,936,000	22,645,000	679,435,351	101,863,676
2017 Mortgage Lending	163,822,000	108,629,569	165,578,000	65,339,000	44,890,000	10,341,000	558,599,569	86,984,285
2018 Mortgage Lending	132,766,819 '18-'19:	95,574,000 '18-'19:	164,583,000 '18-'19:	48,006,000 '18-'19:	50,818,286 '18-'19:	12,711,000 '18-'19:	504,459,105	73,196,143
2019 Mortgage Lending	119,714,000 -10%	113,536,000 19%	189,141,000 15%	29,345,000 -39%	59,449,083 17%	8,640,000 -32%	519,825,083 3%	86,492,542
<b>Average Mortgage Lending</b>	<b>215,865,546 1.1%</b>	<b>165,974,188 1.4%</b>	<b>201,309,286 2.0%</b>	<b>61,074,000 0.6%</b>	<b>55,943,338 1.5%</b>	<b>41,116,714 2%</b>	<b>741,283,072 1%</b>	<b>116,055,090</b>
2013 Small Business	182,910,000	31,938,072	3,456,000	28,579,000	29,418,000	24,570,000	300,871,072	28,998,500
2014 Small Business	201,943,334	25,928,517	3,120,000	30,315,000	33,479,000	24,958,000	319,743,851	28,121,759
2015 Small Business	199,874,011 3%	40,307,000 166%	82,444,000 5340%	28,186,000 -10%	38,102,000 61%	39,024,000 123%	427,937,011 96%	39,665,500
2016 Small Business	188,786,432	49,730,908	97,819,000	69,084,000	44,542,000	61,578,000	511,540,340	65,331,000
2017 Small Business	188,123,963	55,283,707	114,462,000	25,832,000	38,278,000	58,891,000	480,870,670	57,087,354
2018 Small Business	204,614,290	65,903,000	149,040,000	26,958,000	40,565,000	63,193,000	550,273,290	64,548,000
2019 Small Business	188,164,000 -8%	84,877,000 29%	188,008,000 26%	25,675,000 -5%	47,278,000 17%	54,752,000 -13%	588,754,000 7%	69,814,500
<b>Average Sm Biz Lending</b>	<b>193,488,004 1.0%</b>	<b>50,566,886 0.4%</b>	<b>91,192,714 0.9%</b>	<b>33,518,429 0.3%</b>	<b>38,808,857 1.1%</b>	<b>46,709,429 3%</b>	<b>454,284,319 1%</b>	<b>50,509,516</b>
2013 Aff Hsg Development	23,458,000	48,075,000	33,000,000	57,318,694	52,382,000	153,383,081	367,616,775	50,228,500
2014 Aff Hsg Development	22,486,790	3,973,568	6,400,000	84,619,485	24,500,000	37,250,000	179,229,843	23,493,395
2015 Aff Hsg Development	35,944,710 145%	144,259,570 -46%	0 -96%	74,298,561 96%	88,400,738 -95%	55,660,000 75%	398,563,579 27%	64,979,281
2016 Aff Hsg Development	34,717,999	6,565,000	119,616,037	75,642,295	27,590,000	147,102,000	411,233,331	55,180,147
2017 Aff Hsg Development	19,267,385	57,678,829	37,825,972	54,013,249	97,942,246	99,563,000	366,290,681	55,846,039
2018 Aff Hsg Development	108,313,846	44,750,000	0	26,379,558	223,732	315,880,000	495,547,136	35,564,779
2019 Aff Hsg Development	57,442,647 -47%	25,894,840 -42%	1,308,250 #DIV/0!	112,629,108 327%	2,421,000 982%	267,674,000 -15%	467,369,845 -6%	41,668,744
<b>Average Aff Hsg Lending</b>	<b>43,090,197 0.2%</b>	<b>47,313,830 0.4%</b>	<b>28,307,180 0.3%</b>	<b>69,271,564 0.6%</b>	<b>41,922,817 1.2%</b>	<b>153,787,440 9%</b>	<b>383,693,027 1%</b>	<b>46,708,698</b>
<b>TOTAL 2013 LENDING*</b>	\$660,589,745	\$502,162,049	\$403,169,000	\$291,712,540	\$176,592,000	\$340,048,081	\$2,374,273,415	\$371,608,541
<b>TOTAL 2014 LENDING*</b>	\$468,019,049	\$185,066,844	\$162,618,000	\$173,573,485	\$97,909,660	\$96,406,000	\$1,183,593,038	\$168,095,743
<b>TOTAL 2015 LENDING*</b>	\$475,414,421 -43%	\$329,189,342 -53%	\$260,499,000 4%	\$202,968,561 -22%	\$202,188,738 -38%	\$131,871,000 -3%	\$1,602,131,062 -28%	\$231,733,781
<b>TOTAL 2016 LENDING*</b>	\$444,817,552	\$245,814,491	\$534,335,037	\$221,417,600	\$128,439,500	\$256,325,000	\$1,831,149,180	\$251,069,746
<b>TOTAL 2017 LENDING*</b>	\$390,758,248	\$254,838,950	\$454,208,972	\$232,710,249	\$186,138,746	\$168,795,000	\$1,687,450,165	\$243,774,600
<b>TOTAL 2018 LENDING*</b>	\$453,841,055	\$224,710,237	\$316,085,000	\$118,498,558	\$93,769,018	\$391,784,000	\$1,598,687,868	\$270,397,619
<b>TOTAL 2019 LENDING*</b>	\$377,012,147 -17%	\$233,545,373 4%	\$421,049,250 33%	\$226,477,858 91%	\$110,247,083 18%	\$331,066,000 -15%	\$1,699,397,711 6%	\$282,305,687
<b>Average Total Lending*</b>	<b>467,207,460 2.5%</b>	<b>282,189,612 2.4%</b>	<b>364,566,323 3.6%</b>	<b>209,622,693 2.0%</b>	<b>142,183,535 3.9%</b>	<b>245,185,012 14%</b>	<b>\$1,710,954,634 3%</b>	<b>\$259,855,102</b>
2013 Investments & Tax Credits	53,076,000	34,122,208	38,000,000	63,760,377	37,309,659	67,669,170	293,937,414	45,538,000
2014 Investments & Tax Credits	13,626,210	13,619,248	18,400,000	51,522,066	60,340,947	28,048,083	185,556,554	23,224,042
2015 Investments & Tax Credits	44,370,415 -34%	7,464,583 59%	32,265,000 -36%	16,140,120 -77%	99,330,976 51%	10,345,937 -100%	209,917,031 -37%	24,202,560
2016 Investments & Tax Credits	59,928,690	52,324,839	15,422,221	104,531,165	82,937,120	6,141,818	321,285,853	56,126,765
2017 Investments & Tax Credits	1,217,212	88,673,189	26,278,541	13,000,000	37,167,169	29,095,344	195,431,455	27,686,943
2018 Investments & Tax Credits	34,504,373	34,868,757	93,964,869	0	27,106,425	33,291,238	223,735,662	33,897,806
2019 Investments & Tax Credits	35,110,714 2%	54,232,196 56%	24,380,000 -74%	14,938,619 #DIV/0!	56,427,000 108%	0 -100%	185,088,529 -17%	29,745,357
<b>Average Total Investments</b>	<b>22,214,525 0.1%</b>	<b>11,041,208 0.1%</b>	<b>17,733,000 0.2%</b>	<b>63,315,974 0.6%</b>	<b>39,396,316 1.1%</b>	<b>21,212,638 1%</b>	<b>174,913,661 0.3%</b>	<b>21,415,950</b>
2013 CRA Corporate Giving	1,387,000	525,640	781,000	1,365,690	850,000	888,000	5,797,330	869,000
2014 CRA Corporate Giving	1,409,500	937,219	480,000	1,332,083	614,690	615,500	5,388,992	776,360
2015 CRA Corporate Giving	2,029,600 98%	635,432 13%	453,000 61%	1,508,000 37%	856,770 20%	615,000 -65%	6,097,802 34%	746,101
2016 CRA Corporate Giving	2,525,000	639,166	158,778	1,064,368	985,563	366,250	5,739,125	812,365
2017 CRA Corporate Giving	2,722,000	602,082	352,500	1,351,339	996,950	698,000	6,722,871	847,475
2018 CRA Corporate Giving	2,174,000	461,549	162,250	2,278,250	1,075,180	430,000	6,581,229	768,365
2019 CRA Corporate Giving	2,740,000 26%	595,515 29%	1,254,775 673%	1,876,850 -18%	1,020,000 -5%	307,000 -29%	7,794,140 18%	1,137,388
<b>Average CRA Corporate Giving</b>	<b>2,141,014 0.01%</b>	<b>628,086 0.01%</b>	<b>520,329 0.01%</b>	<b>1,539,511 0.01%</b>	<b>914,165 0.03%</b>	<b>559,964 0.03%</b>	<b>6,303,070 0.01%</b>	<b>851,007</b>
<b>2013 SURVEY TOTAL</b>	\$715,052,745	\$536,809,897	\$441,950,000	\$356,838,607	\$214,751,659	\$408,605,251	\$2,674,008,159	\$425,277,625
<b>2014 SURVEY TOTAL</b>	\$483,054,759	\$199,623,311	\$181,498,000	\$226,427,634	\$158,865,297	\$125,069,583	\$1,374,538,584	\$190,560,656
<b>2015 SURVEY TOTAL</b>	\$521,814,436 -42%	\$327,289,357 -46%	\$293,217,000 1%	\$220,616,681 -32%	\$302,376,484 -22%	\$142,831,937 -19%	\$1,818,145,895 -29%	\$297,796,742
<b>2016 SURVEY TOTAL</b>	\$507,271,242	\$298,778,496	\$549,916,036	\$327,620,265	\$212,362,183	\$262,833,068	\$2,158,781,290	\$313,199,381
<b>2017 SURVEY TOTAL</b>	\$394,697,460	\$344,114,221	\$480,840,013	\$247,061,588	\$224,302,865	\$198,588,344	\$1,889,604,491	\$295,587,905
<b>2018 SURVEY TOTAL</b>	\$490,519,428	\$260,040,543	\$410,212,119	\$120,776,808	\$121,950,623	\$425,505,238	\$1,829,004,759	\$335,126,331
<b>2019 SURVEY TOTAL</b>	\$414,862,861 -15%	\$288,373,084 11%	\$446,684,025 9%	\$243,293,327 101%	\$167,694,083 38%	\$331,373,000 -22%	\$1,892,280,380 3.5%	\$309,873,042
<b>Average Survey Total</b>	<b>503,896,133 2.7%</b>	<b>323,575,558 2.7%</b>	<b>400,616,742 3.9%</b>	<b>248,947,844 2.3%</b>	<b>200,329,028 5.5%</b>	<b>270,686,632 15%</b>	<b>\$1,948,051,937 3%</b>	<b>309,631,669</b>

	Wells Fargo	Bank of America	Chase	Union Bank	U.S. Bank	Citibank	RTF TOTALS	Median
2013 % of Deposits	4.4%	5.6%	6.0%	5.1%	6.0%	25.0%	5.5%	5.8%
2014 % of Deposits	2.9%	2.1%	2.3%	3.4%	4.3%	7.2%	2.6%	3.2%
2015 % of Deposits	2.8% <i>-51%</i>	3.0% <i>-63%</i>	3.3% <i>-42%</i>	2.3% <i>-56%</i>	8.5% <i>-22%</i>	7.9% <i>-32%</i>	3.4% <i>-45%</i>	3.1%
2016 % of Deposits	2.5%	2.5%	5.4%	3.2%	5.8%	14.9%	3.7%	4.3%
2017 % of Deposits	2.0%	2.9%	4.7%	2.4%	6.2%	11.3%	3.0%	3.8%
2018 % of Deposits	2.4%	1.9%	3.3%	1.1%	3.3%	23.1%	2.9%	2.9%
2019 % of Deposits	2.1% <i>-12%</i>	2.1% <i>11%</i>	3.5% <i>6%</i>	2.2% <i>107%</i>	4.7% <i>40%</i>	17.0% <i>-26%</i>	3.0% <i>5%</i>	2.9%
<b>Average % of Deposits</b>	<b>2.7%</b> <i>2.68%</i>	<b>2.8%</b> <i>3%</i>	<b>4.1%</b> <i>3.91%</i>	<b>2.8%</b> <i>2.32%</i>	<b>5.5%</b> <i>5.50%</i>	<b>15.2%</b> <i>15%</i>	<b>33.2%</b>	<b>3.7%</b>
<b>2013 Local Deposits</b>	\$16,244,563,000	\$9,630,671,000	\$7,420,146,000	\$9,918,222,000	\$3,586,829,000	\$1,636,264,000	\$48,436,695,000	
<b>2014 Local Deposits</b>	\$16,484,044,000	\$9,707,069,000	\$8,063,920,000	\$12,456,911,000	\$3,672,131,000	\$1,728,855,000	\$52,112,930,000	
<b>2015 Local Deposits</b>	\$18,564,864,000 <b>19%</b>	\$11,350,323,000 <b>44%</b>	\$8,939,891,000 <b>74%</b>	\$9,670,607,000 <b>9%</b>	\$3,562,139,000 <b>0%</b>	\$1,797,112,000 <b>19%</b>	\$53,884,936,000 <b>29%</b>	
<b>2016 Local Deposits</b>	\$19,962,868,000	\$11,974,911,000	\$10,161,065,000	\$10,123,012,000	\$3,641,095,000	\$1,762,000,000	\$57,624,951,000	
<b>2017 Local Deposits</b>	\$20,630,071,000	\$13,091,471,000	\$11,628,076,000	\$11,093,318,000	\$3,798,868,000	\$1,837,000,000	\$62,078,804,000	
<b>2018 Local Deposits</b>	\$20,197,116,000	\$13,901,881,000	\$12,531,057,000	\$11,144,860,000	\$3,659,666,000	\$1,846,000,000	\$63,280,580,000	
<b>2019 Local Deposits</b>	\$19,366,398,000 <i>-4%</i>	\$13,888,704,000 <i>0%</i>	\$12,904,552,000 <i>3%</i>	\$10,824,568,000 <i>-3%</i>	\$3,589,222,000 <i>-2%</i>	\$1,946,000,000 <i>5%</i>	\$62,519,444,000 <i>-1%</i>	

\*Total Lending figure includes Comm. Dev. and Sm. Farm Lending. Due to space constraints, these subtotals are not shown.

Percentages show the 7-year change (blue or white), 2-year change (italics), and percent of deposits (small italics).

SAN DIEGO CITY-COUNTY REINVESTMENT TASK FORCE

2019 COMMUNITY INVESTMENT SURVEY SUMMARY

	Wells Fargo	Bank of America	JPMorgan Chase	MUFG Union Bank	U.S. Bank	Citibank	RTF TOTALS	Median
<b>Mortgage Lending</b>	<b>119,714,000</b>	<b>113,536,000</b>	<b>189,141,000</b>	<b>29,345,000</b>	<b>59,449,083</b>	<b>8,640,000</b>	<b>519,825,083</b>	<b>86,492,542</b>
% of deposits	0.6%	0.8%	1.5%	0.3%	1.7%	0.4%	0.8%	0.7%
% of total	23.0%	21.8%	36.4%	5.6%	11.4%	1.7%	27.5%	16.6%
<b>Small Business</b>	<b>188,164,000</b>	<b>84,877,000</b>	<b>188,008,000</b>	<b>25,675,000</b>	<b>47,278,000</b>	<b>54,752,000</b>	<b>588,754,000</b>	<b>69,814,500</b>
% of deposits	1.0%	0.61%	1.46%	0.24%	1.3%	2.8%	0.9%	1.1%
% of total	32.0%	14.4%	31.9%	4.4%	8.0%	9.3%	31.1%	12%
<b>Small Farm</b>	<b>2,864,000</b>	<b>697,000</b>	<b>1,367,000</b>	<b>0</b>	<b>349,000</b>	<b>0</b>	<b>5,277,000</b>	<b>523,000</b>
% of deposits	0.015%	0.005%	0.011%	0.000%	0.010%	0.0%	0.008%	0.01%
% of total	54.3%	13.2%	25.9%	0.0%	6.6%	0.0%	0.3%	10%
<b>Aff Hsg Devel</b>	<b>57,442,647</b>	<b>25,894,840</b>	<b>1,308,250</b>	<b>112,629,108</b>	<b>2,421,000</b>	<b>267,674,000</b>	<b>467,369,845</b>	<b>41,668,744</b>
% of deposits	0.3%	0.2%	0.0%	1.04%	0.07%	13.8%	0.7%	0.2%
% of total	12.3%	5.5%	0.3%	24.1%	0.5%	57.3%	24.7%	9%
<b>Community Devel</b>	<b>8,827,500</b>	<b>8,540,533</b>	<b>41,225,000</b>	<b>58,828,750</b>	<b>750,000</b>	<b>0</b>	<b>118,171,783</b>	<b>8,684,017</b>
% of deposits	0.05%	0.06%	0.32%	0.5%	0.02%	0.0%	0.19%	0.05%
% of total	7.5%	7.2%	34.9%	49.8%	0.6%	0.0%	6.2%	7.3%
<b>TOTAL LENDING</b>	<b>\$377,012,147</b>	<b>\$233,545,373</b>	<b>\$421,049,250</b>	<b>\$226,477,858</b>	<b>\$110,247,083</b>	<b>\$331,066,000</b>	<b>\$1,699,397,711</b>	<b>\$282,305,687</b>
% of deposits	1.9%	1.7%	3.3%	2.1%	3.1%	17.0%	3%	2.6%
% of total	22.2%	13.7%	24.8%	13.3%	6.5%	19.5%	90%	17%
<b>Tax Credits (various)</b>	<b>35,110,714</b>	<b>54,232,196</b>	<b>24,380,000</b>	<b>14,938,619</b>	<b>56,427,000</b>	<b>0</b>	<b>185,088,529</b>	<b>29,745,357</b>
% of deposits	0.2%	0.4%	0.2%	0.1%	1.6%	0.0%	0.3%	0.2%
% of total	19.0%	29.3%	13.2%	8.1%	30.5%	0.0%	9.8%	16.1%
<b>Other CRA Investments</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
% of deposits	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
% of total	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	0.0%	#DIV/0!
<b>TOTAL INVESTMENTS</b>	<b>\$35,110,714</b>	<b>\$54,232,196</b>	<b>\$24,380,000</b>	<b>\$14,938,619</b>	<b>\$56,427,000</b>	<b>\$0</b>	<b>\$185,088,529</b>	<b>\$29,745,357</b>
% of deposits	0.2%	0.4%	0.2%	0.1%	1.6%	0.0%	0.3%	0.2%
% of total	19.0%	29.3%	13.2%	8.1%	30.5%	0.0%	9.8%	
<b>CRA-Qualified Giving</b>	<b>2,740,000</b>	<b>595,515</b>	<b>1,254,775</b>	<b>1,876,850</b>	<b>1,020,000</b>	<b>307,000</b>	<b>7,794,140</b>	<b>1,137,388</b>
% of deposits	0.014%	0.004%	0.010%	0.017%	0.028%	0.016%	0.012%	0.015%
% of total	35.2%	7.6%	16.1%	24.1%	13.1%	3.9%	0.4%	15%
<b>TOTAL CRA GIVING</b>	<b>\$2,740,000</b>	<b>\$595,515</b>	<b>\$1,254,775</b>	<b>\$1,876,850</b>	<b>\$1,020,000</b>	<b>\$307,000</b>	<b>\$7,794,140</b>	<b>\$1,137,388</b>
<b>RTF SURVEY TOTAL</b>	<b>\$414,862,861</b>	<b>\$288,373,084</b>	<b>\$446,684,025</b>	<b>\$243,293,327</b>	<b>\$167,694,083</b>	<b>\$331,373,000</b>	<b>\$1,892,280,380</b>	<b>\$309,873,042</b>
% of total deposits	2.1%	2.1%	3.5%	2.2%	4.7%	17.0%	3.0%	2.9%
% of RTF total	21.9%	15.2%	23.6%	12.9%	8.9%	17.5%	100%	16%

RTF totals don't credit purchased mortgages, larger business loans or non-income restricted multifamily housing loans that the OCC (Office of the Comptroller of the Currency) gives CRA credit, below:

<b>OCC CRA TOTAL</b>	<b>\$930,171,861</b>	<b>\$457,324,084</b>	<b>\$842,711,525</b>	<b>\$395,322,310</b>	<b>\$236,878,083</b>	<b>\$393,563,000</b>	<b>\$3,255,970,863</b>	<b>\$426,323,197</b>
% of total deposits	4.8%	3.3%	6.5%	3.7%	6.6%	20.2%	5%	6%
% of RTF total	28.6%	14.0%	25.9%	12.1%	7.3%	12.1%	100%	13%
Total local deposits	<b>\$19,366,398,000</b>	<b>\$13,888,704,000</b>	<b>\$12,904,552,000</b>	<b>\$10,824,568,000</b>	<b>\$3,589,222,000</b>	<b>\$1,946,000,000</b>	<b>\$62,519,444,000</b>	<b>\$11,864,560,000</b>
% of RTF total	31%	22%	21%	17%	6%	3%	100%	
Market share	25%	15%	13%	13%	5%	2%	72%	10/14/20

I. Rating				Bank of America					JPMorgan Chase Bank					
National rating (as of mid-2019 survey)				Lending Outstanding	Investment Outstanding	Service High Satisfactory	OVERALL Outstanding			Lending High Sat	Investment Outstanding	Service High Satisfactory	OVERALL Satisfactory	
California rating (as of mid-2019 survey)				Outstanding	Outstanding	Outstanding	Outstanding			Outstanding	Outstanding	High Satisfactory	Outstanding	
Most recent evaluation date				1/8/2018					12/31/2013					
Period covered by exam				1/1/2012-12/31/2016 (2-1/4 years)					1/1/2011-12/31/2013 (3 years)					
Next anticipated examination date				12/2023					TBD					
<b>II. Performance Context</b>														
All RTF Banks				<i>avg loan size:</i>					<i>avg loan size:</i>					
San Diego market share	54.19%			<i>home purch</i>	\$365,517	Deposits \$	Market Share	% of RTF Total		<i>home purch</i>	\$343,871	Deposits \$	Market Share	% of RTF Total
San Diego MSA Deposits (June 30, 2019)	\$62,519,444,000			<i>smallest biz</i>	\$13,219	\$13,888,704,000		15.53%		<i>smallest biz</i>	\$11,015	\$12,904,552,000	14.13%	20.64%
<b>III. Lending Test</b>														
All RTF Banks				Number or Count					Number or Count					
% of				% of RTF					% of RTF					
LMI Single-Family Home Loans:				Dollar Amount					Dollar Amount					
Originations: Home purchases	501	\$178,755,452	0.29%	116	23.15%	\$42,400,000	0.31%	23.72%	186	37.13%	\$63,960,000	0.50%	35.78%	
Originations: Refinancings	1,225	\$312,190,016	0.50%	254	20.73%	\$62,774,000	0.45%	20.11%	471	38.45%	\$120,554,000	0.93%	38.62%	
Originations: Home improvement	299	\$28,879,615	0.05%	81	27.09%	\$8,362,000	0.06%	28.95%	58	19.40%	\$4,627,000	0.04%	16.02%	
Total purchases (all three loan types)*	1,288	\$426,589,000	0.68%	55	4.27%	\$16,612,000	0.12%	3.89%	378	29.35%	\$133,278,000	1.03%	31.24%	
<b>Total originations (all three loan types)</b>	<b>2,025</b>	<b>\$519,825,083</b>	<b>0.83%</b>	<b>451</b>	<b>70.98%</b>	<b>\$113,536,000</b>	<b>0.82%</b>	<b>72.78%</b>	<b>715</b>	<b>94.97%</b>	<b>\$189,141,000</b>	<b>1.47%</b>	<b>90.42%</b>	
<b>Sm Bus. Loans (&lt;\$100k, &lt;\$1 million rev)</b>	<b>41,354</b>	<b>\$588,754,000</b>	<b>0.94%</b>	<b>6,421</b>	<b>9.86%</b>	<b>\$84,877,000</b>	<b>0.61%</b>	<b>14.42%</b>	<b>17,068</b>	<b>41.27%</b>	<b>\$188,008,000</b>	<b>1.46%</b>	<b>31.93%</b>	
<b>Other CRA-qualified Small Bus. Loans*</b>	<b>16,981</b>	<b>\$848,344,000</b>	<b>1.36%</b>	<b>4,078</b>	<b>24.02%</b>	<b>\$152,339,000</b>	<b>1.10%</b>	<b>17.96%</b>	<b>5,781</b>	<b>34.04%</b>	<b>\$183,977,000</b>	<b>1.43%</b>	<b>21.69%</b>	
<b>CRA-qualified Small Farm Loans</b>	<b>283</b>	<b>\$5,277,000</b>	<b>0.01%</b>	<b>48</b>	<b>16.96%</b>	<b>\$697,000</b>	<b>0.01%</b>	<b>13.21%</b>	<b>126</b>	<b>44.52%</b>	<b>\$1,367,000</b>	<b>0.01%</b>	<b>25.90%</b>	
Affordable Housing - Construction, Acq/Rehat	8	\$172,726,023	0.28%	1	12.50%	\$23,187,101	0.17%	13.42%	0	0.00%	\$0	0.00%	0.00%	
Affordable Housing - Bonds	7	\$215,922,250	0.35%		0.00%		0.00%	0.00%	1	14.29%	\$1,308,250	0.01%	0.61%	
Affordable Housing - Loan Extensions	2	\$2,921,000	0.00%		0.00%		0.00%	0.00%	0	0.00%	\$0	0.00%	0.00%	
Affordable Housing - Permanent Loans	9	\$71,317,739	0.11%	1	11.11%	\$2,707,739	0.02%	3.80%	0	0.00%	\$0	0.00%	0.00%	
Affordable Housing - Other Loans	6	\$4,482,833	0.01%		0.00%		0.00%	0.00%	0	0.00%	\$0	0.00%	0.00%	
<b>Aff. hsg. units built, rehabbed or financed</b>	<b>2,803</b>	<b>(some units counted twice)</b>			<b>0.00%</b>				<b>324</b>	<b>11.56%</b>				
Other CRA-qualified Multifamily Loans*	71	\$88,757,483	0.14%		0.00%		0.00%	0.00%	65	91.55%	\$78,772,500	0.61%	88.75%	
Other Community Development Loans	23	\$118,171,783	0.19%	4	17.39%	\$8,540,533	0.06%	7.23%	1	4.35%	\$41,225,000	0.32%	34.89%	
<b>TOTAL LENDING (RTF calc.)</b>	<b>45,232</b>	<b>\$1,272,808,711</b>	<b>2.04%</b>	<b>6,926</b>	<b>15.31%</b>	<b>\$233,545,373</b>	<b>1.68%</b>	<b>18.35%</b>	<b>18,235</b>	<b>40.31%</b>	<b>\$421,049,250</b>	<b>3.26%</b>	<b>33.08%</b>	
<b>Total Lending (OCC/CRA calc.)*</b>	<b>63,572</b>	<b>\$2,636,499,194</b>	<b>4.22%</b>	<b>11,059</b>	<b>17.40%</b>	<b>\$402,496,373</b>	<b>2.90%</b>	<b>15.27%</b>	<b>24,459</b>	<b>38.47%</b>	<b>\$817,076,750</b>	<b>6.33%</b>	<b>30.99%</b>	
<b>IV. Investment Test</b>														
All RTF Banks				Number or Count					Number or Count					
% of				% of RTF					% of RTF					
Tax Credits:				Dollar Amount					Dollar Amount					
Affordable Housing (LIHTC)	14	\$185,088,529	0.296%	3	21.43%	\$54,232,196	0.39%	29.30%	1	7.14%	\$24,380,000	0.19%	13.17%	
Economic Development (NMTC)	0													
CRA-Qualified Renewable Energy Tax Credit	0													
Other CRA-Qualified Investments:														
Sm Business CDFI Investment	0													
Equity Investment	0													
<b>TOTAL TAX CREDITS &amp; INVESTMENTS</b>	<b>14</b>	<b>\$185,088,529</b>	<b>0.30%</b>	<b>3</b>	<b>21.43%</b>	<b>\$54,232,196</b>	<b>0.39%</b>	<b>29.30%</b>	<b>1</b>	<b>7.14%</b>	<b>\$24,380,000</b>	<b>0.19%</b>	<b>13.17%</b>	
CRA-Qualified Sponsorships & Grants	366	\$7,794,140	0.012%	19	5.19%	\$595,515	0.004%	7.64%	5	1.37%	\$1,254,775	0.010%	16.10%	
<b>Total Lending, Investments and Grants (RTF):</b>	<b>\$1,465,691,380</b>	<b>2.3%</b>				<b>\$288,373,084</b>	<b>2.1%</b>	<b>19.7%</b>			<b>\$446,684,025</b>	<b>3.5%</b>	<b>30.5%</b>	
Total Lending, Investments and Grants (OCC):*	\$2,829,381,863	4.5%				\$457,324,084	3.3%	16.2%			\$842,711,525	6.5%	29.8%	

\*OCC/CRA totals incl. pur. mortgages, lg. bus. loans & multifam not incl. by RTF

I. Rating				Citibank					MUFG Union Bank					
National rating (as of mid-2019 survey)				Lending	Investment	Service	OVERALL			Lending	Investment	Service	OVERALL	
California rating (as of mid-2019 survey)				Outstanding	Outstanding	Outstanding	Satisfactory			High Satisf.	Outstanding	Outstanding	Outstanding	
Most recent evaluation date				Outstanding	Outstanding	Outstanding	Outstanding			High Satisf.	Outstanding	Outstanding	Outstanding	
Period covered by exam				2/5/2018		(released Feb. 2017)				7/13/15				
Next anticipated examination date				1/1/2012 - 12/31/2016		(2 years)				4/12/2012-12/31/2014		(3 years)		
				00/00/2022						Unknown				
<b>II. Performance Context</b>														
All RTF Banks				avg loan size:					avg loan size:					
San Diego market share	54.19%			home purch	\$410,889	Deposits \$	Market Share	% of RTF Total	home purch	\$338,158	Deposits \$	Market Share	% of RTF Total	
San Diego MSA Deposits (June 30, 2019)	\$62,519,444,000			smallest biz	\$5,810	\$1,946,000,000	2.13%	3.11%	smallest biz	\$42,579	\$10,824,568,000	12.79%	17.31%	
<b>III. Lending Test</b>														
All RTF Banks				Number					Number					
%				% of RTF					% of RTF					
%				Dollar					Dollar					
%				% of					% of					
%				% of RTF					% of RTF					
LMI Single-Family Home Loans:				LMI Single-Family Home Loans:					LMI Single-Family Home Loans:					
Originations: Home purchases	501	\$178,755,452	0.29%	9	1.80%	\$3,698,000	0.19%	2.07%	19	3.79%	\$6,425,000	0.06%	3.59%	
Originations: Refinancings	1,225	\$312,190,016	0.50%	23	1.88%	\$4,427,000	0.23%	1.42%	87	7.10%	\$17,015,000	0.16%	5.45%	
Originations: Home improvement	299	\$28,879,615	0.05%	8	2.68%	\$515,000	0.03%	1.78%	57	19.06%	\$5,905,000	0.05%	20.45%	
Total purchases (all three loan types)*	1,288	\$426,589,000	0.68%	150	11.65%	\$45,214,000	2.32%	10.60%	26	2.02%	\$7,570,000	0.07%	1.77%	
<b>Total originations (all three loan types)</b>	<b>2,025</b>	<b>\$519,825,083</b>	<b>0.83%</b>	<b>40</b>	<b>6.35%</b>	<b>\$8,640,000</b>	<b>0.44%</b>	<b>5.27%</b>	<b>163</b>	<b>29.96%</b>	<b>\$29,345,000</b>	<b>0.27%</b>	<b>29.49%</b>	
Sm Bus. Loans (<\$100k, <\$1 million rev)	41,354	\$588,754,000	0.94%	9,424	22.79%	\$54,752,000	2.81%	9.30%	603	1.46%	\$25,675,000	0.24%	4.36%	
Other CRA-qualified Small Bus. Loans*	16,981	\$848,344,000	1.36%	1,846	10.87%	\$16,976,000	0.87%	2.00%	1,019	6.00%	\$134,474,000	1.24%	15.85%	
CRA-qualified Small Farm Loans	283	\$5,277,000	0.01%		0.00%		0.00%	0.00%		0.00%		0.00%	0.00%	
Affordable Housing - Construction, Acq/Rehat	8	\$172,726,023	0.28%	1	12.50%	\$650,000	0.03%	0.38%	3	37.50%	\$96,429,108	0.89%	55.83%	
Affordable Housing - Bonds	7	\$215,922,250	0.35%	6	85.71%	\$214,614,000	11.03%	99.39%		0.00%	\$0	0.00%	0.00%	
Affordable Housing - Loan Extensions	2	\$2,921,000	0.00%		0.00%	\$0	0.00%	0.00%		0.00%	\$0	0.00%	0.00%	
Affordable Housing - Permanent Loans	9	\$71,317,739	0.11%	7	77.78%	\$52,410,000	2.69%	73.49%	1	11.11%	\$16,200,000	0.15%	22.72%	
Affordable Housing - Other Loans	6	\$4,482,833	0.01%		0.00%		0.00%	0.00%		0.00%		0.00%	0.00%	
Aff. hsg. units built, rehabbed or financed	2,803	(some units counted twice)		1,636	58.37%				467	16.66%				
Other CRA-qualified Multifamily Loans*	71	\$88,757,483	0.14%		0.00%		0.00%	0.00%	6	8.45%	\$9,984,983	0.09%	11.25%	
Other Community Development Loans	23	\$118,171,783	0.19%		0.00%	\$0	0.00%	0.00%	12	52.17%	\$58,828,750	0.54%	49.78%	
<b>TOTAL LENDING (RTF calc.)</b>	<b>45,232</b>	<b>\$1,272,808,711</b>	<b>2.04%</b>	<b>11,114</b>	<b>24.57%</b>	<b>\$331,066,000</b>	<b>17.01%</b>	<b>26.01%</b>	<b>1,249</b>	<b>2.76%</b>	<b>\$226,477,858</b>	<b>2.09%</b>	<b>17.79%</b>	
<b>Total Lending (OCC/CRA calc.)*</b>	<b>63,572</b>	<b>\$2,636,499,194</b>	<b>4.22%</b>	<b>13,110</b>	<b>20.62%</b>	<b>\$393,256,000</b>	<b>20.21%</b>	<b>14.92%</b>	<b>2,300</b>	<b>3.62%</b>	<b>\$378,506,841</b>	<b>3.50%</b>	<b>14.36%</b>	
<b>IV. Investment Test</b>														
All RTF Banks				Number					Number					
%				% of RTF					% of RTF					
%				Dollar					Dollar					
%				% of					% of					
%				% of RTF					% of RTF					
Tax Credits:				Tax Credits:					Tax Credits:					
Affordable Housing (LIHTC)	14	\$185,088,529	0.296%	0	0.00%		0.00%	0.00%	3	21.43%	\$14,938,619	0.14%	8.07%	
Economic Development (NMTC)	0													
CRA-Qualified Renewable Energy Tax Credit	0													
Other CRA-Qualified Investments:				Other CRA-Qualified Investments:					Other CRA-Qualified Investments:					
Sm Business CDFI Investment	0													
Equity Investment	0													
<b>TOTAL TAX CREDITS &amp; INVESTMENTS</b>	<b>14</b>	<b>\$185,088,529</b>	<b>0.30%</b>						<b>3</b>	<b>21.43%</b>	<b>\$14,938,619</b>	<b>0.14%</b>	<b>8.07%</b>	
CRA-Qualified Sponsorships & Grants	366	\$7,794,140	0.012%	4	1.09%	\$307,000	0.016%	3.94%	132	36.07%	\$1,876,850	0.017%	24.08%	
<b>Total Lending, Investments and Grants (RTF):</b>	<b>\$1,465,691,380</b>	<b>2.3%</b>				<b>\$331,373,000</b>	<b>17.0%</b>	<b>22.6%</b>			<b>\$243,293,327</b>	<b>2.2%</b>	<b>16.6%</b>	
Total Lending, Investments and Grants (OCC):*	\$2,829,381,863	4.5%				\$393,563,000	20.2%	13.9%			\$395,322,310	3.7%	14.0%	

\*OCC/CRA totals incl. pur. mortgages, lg. bus. loans & multifam not incl. by RTF



I. Rating				U.S. Bank					Wells Fargo Bank							
National rating (as of mid-2019 survey)				Lending Outstanding	Investment Outstanding	Service Outstanding	OVERALL Outstanding					Lending Outstanding	Investment High Satisf.	Service High Satisfactory	OVERALL Outstanding	
California rating (as of mid-2019 survey)				Outstanding	Outstanding	High Satisfactory	Outstanding					Outstanding	Outstanding	High Satisfactory	Outstanding	
Most recent evaluation date				10/16/2017					<a href="#">2/4/19</a>							
Period covered by exam				1/1/2012-12/31/2015 (4 years)					1/1/2012-12/31/2018							
Next anticipated examination date				00/00/2022					2023							
<b>II. Performance Context</b>																
All RTF Banks				<i>avg loan size:</i>					<i>avg loan size:</i>							
San Diego market share		54.19%		<i>home purch</i>	\$420,345	<b>Deposits \$</b>	<b>Market Share</b>	<b>% of RTF Total</b>				<i>home purch</i>	\$347,568	<b>Deposits \$</b>	<b>Market Share</b>	<b>% of RTF Total</b>
San Diego MSA Deposits (June 30, 2019)		\$62,519,444,000		<i>smallest biz</i>	\$10,941	\$3,589,222,000	3.93%	5.74%				<i>smallest biz</i>	\$32,110	\$19,366,398,000	21.2%	30.98%
<b>III. Lending Test</b>																
All RTF Banks				<b>Number or Count</b>					<b>Number or Count</b>							
<b>LMI Single-Family Home Loans:</b>				<b>% of RTF Total</b>					<b>% of RTF Total</b>							
	<b>Number</b>	<b>Amount</b>	<b>% of Deposits</b>			<b>Dollar Amount</b>	<b>% of Deposits</b>	<b>% of RTF Total</b>			<b>Dollar Amount</b>	<b>% of Deposits</b>	<b>% of RTF Total</b>			
Originations: Home purchases	501	\$178,755,452	0.29%	39	7.78%	\$16,393,452	0.46%	9.17%	132	26.35%	\$45,879,000	0.24%	25.67%			
Originations: Refinancings	1,225	\$312,190,016	0.50%	129	10.53%	\$37,207,016	1.04%	11.92%	261	21.31%	\$70,213,000	0.36%	22.49%			
Originations: Home improvement	299	\$28,879,615	0.05%	50	16.72%	\$5,848,615	0.16%	20.25%	45	15.05%	\$3,622,000	0.02%	12.54%			
Total purchases (all three loan types)*	1,288	\$426,589,000	0.68%		0.00%		0.00%	0.00%	679	52.72%	\$223,915,000	1.16%	52.49%			
<b>Total originations (all three loan types)</b>	<b>2,025</b>	<b>\$519,825,083</b>	<b>0.83%</b>	<b>218</b>	<b>35.04%</b>	<b>\$59,449,083</b>	<b>1.66%</b>	<b>41.34%</b>	<b>438</b>	<b>62.70%</b>	<b>\$119,714,000</b>	<b>0.62%</b>	<b>60.70%</b>			
<b>Sm Bus. Loans (&lt;\$100k, &lt;\$1 million rev)</b>	41,354	\$588,754,000	0.94%	4,321	10.45%	\$47,278,000	1.32%	8.03%	5,860	14.17%	\$188,164,000	0.97%	31.96%			
<b>Other CRA-qualified Small Bus. Loans*</b>	16,981	\$848,344,000	1.36%	921	5.42%	\$69,184,000	1.93%	8.16%	3,336	19.65%	\$291,394,000	1.50%	34.35%			
<b>CRA-qualified Small Farm Loans</b>	283	\$5,277,000	0.01%	42	14.84%	\$349,000	0.01%	6.61%	67	23.67%	\$2,864,000	0.01%	54.27%			
Affordable Housing - Construction, Acq/Rehat	8	\$172,726,023	0.28%		0.00%	\$0	0.00%	0.00%	3	37.50%	\$52,459,814	0.27%	30.37%			
Affordable Housing - Bonds	7	\$215,922,250	0.35%		0.00%	\$0	0.00%	0.00%		0.00%	\$0	0.00%	0.00%			
Affordable Housing - Loan Extensions	2	\$2,921,000	0.00%	1	50.00%	\$2,421,000	0.07%	82.88%	1	50.00%	\$500,000	0.00%	17.12%			
Affordable Housing - Permanent Loans	9	\$71,317,739	0.11%		0.00%	\$0	0.00%	0.00%		0.00%	\$0	0.00%	0.00%			
Affordable Housing - Other Loans	6	\$4,482,833	0.01%		0.00%		0.00%	0.00%	6	100.00%	\$4,482,833	0.02%	100.00%			
<i>Aff. hsg. units built, rehabbed or financed</i>	<i>2,803 (some units counted twice)</i>			<i>128</i>	<i>4.57%</i>				<i>248</i>	<i>8.85%</i>						
Other CRA-qualified Multifamily Loans*	71	\$88,757,483	0.14%		0.00%		0.00%	0.00%		0.00%		0.00%	0.00%			
Other Community Development Loans	23	\$118,171,783	0.19%	1	4.35%	\$750,000	0.02%	0.63%	5	21.74%	\$8,827,500	0.05%	7.47%			
<b>TOTAL LENDING (RTF calc.)</b>	45,232	\$1,272,808,711	2.04%	4,711	10.42%	\$110,247,083	3.07%	8.66%	6,628	14.65%	\$377,012,147	1.95%	29.62%			
<b>Total Lending (OCC/CRA calc.)*</b>	63,572	\$2,636,499,194	4.22%	5,632	8.86%	\$179,431,083	5.00%	6.81%	10,643	16.74%	\$892,321,147	4.61%	33.84%			
<b>IV. Investment Test</b>																
All RTF Banks				<b>Number or Count</b>					<b>Number or Count</b>							
<b>Tax Credits:</b>				<b>% of RTF Total</b>					<b>% of RTF Total</b>							
	<b>Number</b>	<b>Amount</b>	<b>% of Deposits</b>			<b>Dollar Amount</b>	<b>% of Deposits</b>	<b>% of RTF Total</b>			<b>Dollar Amount</b>	<b>% of Deposits</b>	<b>% of RTF Total</b>			
Affordable Housing (LIHTC)	14	\$185,088,529	0.296%	5	35.71%	\$56,427,000	1.57%	30.49%	2	14.29%	\$35,110,714	0.18%	18.97%			
Economic Development (NMTC)	0															
CRA-Qualified Renewable Energy Tax Credit	0															
<b>Other CRA-Qualified Investments:</b>																
Sm Business CDFI Investment	0															
Equity Investment	0															
<b>TOTAL TAX CREDITS &amp; INVESTMENTS</b>	14	\$185,088,529	0.30%	5	35.71%	\$56,427,000	1.57%	30.49%	2	14.29%	\$35,110,714	0.18%	18.97%			
CRA-Qualified Sponsorships & Grants	366	\$7,794,140	0.012%	94	25.68%	\$1,020,000	0.028%	13.09%	112	30.60%	\$2,740,000	0.014%	35.15%			
<b>Total Lending, Investments and Grants (RTF):</b>		<b>\$1,465,691,380</b>	<b>2.3%</b>			<b>\$167,694,083</b>	<b>4.7%</b>	<b>11.4%</b>			<b>\$414,862,861</b>	<b>2.1%</b>	<b>28.3%</b>			
Total Lending, Investments and Grants (OCC):*		\$2,829,381,863	4.5%			\$236,878,083	6.6%	8.4%			\$930,171,861	4.8%	32.9%			

\*OCC/CRA totals incl. pur. mortgages, lg. bus. loans & multifam not incl. by RTF