



**NEW YORK STATE
DEPARTMENT OF FINANCIAL SERVICES
FINANCIAL FRAUDS AND CONSUMER PROTECTION DIVISION**

One State Street
New York, NY 10004

PUBLIC SUMMARY

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Date of Evaluation: March 31, 2014

Institution: Metropolitan Commercial Bank
99 Park Avenue
New York, NY 10016

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

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GENERAL INFORMATION

This document is an evaluation of the Community Reinvestment Act (“CRA”) performance of Metropolitan Commercial Bank (“MCB”) prepared by the New York State Department of Financial Services (the “Department” or “DFS”). This evaluation represents the Department’s current assessment and rating of the institution’s CRA performance based on an evaluation conducted as of March 31, 2014. This is the first performance evaluation conducted by DFS since the bank converted to a state charter effective December 31, 2013.

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

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

- (1) Outstanding record of meeting community credit needs;
- (2) Satisfactory record of meeting community credit needs;
- (3) Needs to improve record of meeting community credit needs; and
- (4) Substantial noncompliance in meeting community credit needs.

Section 76.5 further requires that the CRA rating and the written summary (“Evaluation”) be made available to the public. Evaluations of banking institutions are primarily based on a review of performance tests and standards described in Section 76.7 and detailed in Sections 76.8 through 76.13. The tests and standards incorporate the 12 assessment factors contained in Section 28-b of the New York Banking Law.

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

OVERVIEW OF INSTITUTION'S PERFORMANCE

DFS evaluated MCB according to the intermediate small bank performance criteria pursuant to General Regulations of the Superintendent ("GRS") Parts 76.7 and 76.12. The assessment period included calendar years 2009 through 2013 and January 1 to March 31, 2014. DFS assesses MCB a "2" rating, indicating a "Satisfactory" record of helping to meet community credit needs. This is the first performance evaluation conducted by DFS since MCB converted to New York State charter effective December 31, 2013.

The rating is based on the following factors:

Lending Test: "Satisfactory"

MCB's small business, HMDA-reportable and other lending-related activities were reasonable in light of the bank's business strategy, aggregate and peer group activity, and the demographic characteristics of the assessment area.

- **Loan-to-Deposit Ratio and Other Lending-Related Activities:** "Outstanding"

MCB's average loan-to-deposit ("LTD") ratio was more than reasonable considering its size, business strategy, financial condition, and peer group's activity.

During the evaluation period, MCB's average LTD ratio was 94.8%, significantly higher (by 18.7%) than its peer's LTD average of 76.1%.

- **Assessment Area Concentration:** "Outstanding"

During the evaluation period, MCB originated 95% by number and 93% by dollar value of its total HMDA-reportable and small business loans inside its assessment area. This majority of lending inside of its assessment area was an excellent record of lending, albeit with low lending volume in both types of loans.

- **Distribution by Borrower Characteristics:** "Needs to Improve"

MCB's lending to businesses by revenue size demonstrated an excellent rate of lending to small businesses, but MCB's HMDA-reportable lending demonstrated a poor rate of lending to low- and moderate-income ("LMI") borrowers.

Overall, MCB originated 75.0% by number and 84.3% by dollar value of its total business loans to small businesses (those with gross annual revenues of \$1 million or less), compared to aggregate averages of 34.4% and 28.6%, respectively.

By contrast, all 19 of MCB's one-to-four family loans were made to upper or unknown income borrowers; MCB originated no loans to LMI individuals.

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

The distribution of small business and HMDA-reportable loans, based on lending in census tracts of varying income levels, demonstrated a reasonable rate of lending in LMI geographies.

- **Action Taken in Response to Written Complaints with Respect to CRA:**

Neither MCB nor DFS received any written complaints regarding MCB’s CRA performance.

Community Development Test (Loans, Investments, Services): “Satisfactory”

MCB’s community development performance demonstrated reasonable responsiveness to the community development needs of the assessment area, particularly through community development loans and investments.

- **Community Development Loans:** “Outstanding”

During the evaluation period, MCB originated \$67.1 million in new community development loans, which was an excellent level of community development lending.

- **Community Development Qualified Investments:** “Satisfactory”

During the evaluation period, MCB made \$1.9 million in new community development investments and \$217,154 in community development grants. Qualified investments provided affordable housing opportunities to LMI residents of New York City, and 93.0% of grants were contributed to support affordable housing and community service needs.

- **Community Development Services:** “Needs to Improve”

MCB demonstrated a poor level of community development services.

- **Innovative or Complex Practices:**

MCB did not engage in any innovative or complex community development practices.

- **Responsiveness to Credit and Community Development Needs:**

MCB demonstrated reasonable responsiveness to credit and community development needs.

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

PERFORMANCE CONTEXT

Institution Profile

Metropolitan Commercial Bank (“MCB”) was originally chartered in 1999 as a national bank known as Metropolitan National Bank (“MNB”). MNB converted to New York State charter as a commercial bank on November 8, 2013 to become MCB. Metropolitan Bank Holding Corporation is the bank’s holding company and owns 100% of MCB’s stock. PASL Holding LLC, a limited liability holding company, owns 12.94% of the common stock of Metropolitan Bank Holding Corporation.

MCB has four branches (three in Manhattan and one in Brooklyn), including its corporate headquarters at 99 Park Avenue, New York, NY 10016.

MCB offers personal and business banking services, commercial lending products that include real estate financing (such as acquisition loans, income-producing property financing, renovation loans, construction loans) and commercial lending services (such as working capital, equipment financing, accounts receivable financing, medical receivables financing and trade services).

Per the Consolidated Report of Condition (the “Call Report”) as of March 31, 2014, filed with the Federal Deposit Insurance Corporation (“FDIC”), MCB reported total assets of \$662.7 million, of which \$525.4 million were net loans and lease finance receivables. It also reported total deposits of \$499.8 million, resulting in a LTD ratio of 105.1%.

According to the latest available comparative deposit data as of June 30, 2013, MCB had a market share of 0.05%, or \$448.4 million in a market of \$850.4 billion, ranking it 55th among 112 deposit-taking institutions in its assessment area consisting of Bronx, Kings, New York, Queens and Richmond counties. JPMorgan Chase, BNY Mellon and Citibank, collectively, control 64.0% of the deposit market share.

The following table summarizes MCB’s loan portfolio, based on Schedule RC-C of the bank’s December 31, 2010, 2011, 2012, 2013 and March 31, 2014 Call Reports.

TOTAL GROSS LOANS OUTSTANDING										
Loan Type	2010		2011		2012		2013		2014	
	\$000's	%	\$000's	%	\$000's	%	\$000's	%	\$000's	%
Loans secured by Real Estate										
1-4 Family Residential Mort. Loans	47,570	10.6	30,924	7.4	32,035	7.6	54,365	10.8	53,520	10.0
Commercial Mortgage Loans	259,385	57.8	224,231	53.4	228,569	54.1	263,164	52.4	275,823	51.7
Multifamily Mortgages	50,049	11.2	46,749	11.1	44,248	10.5	39,586	7.9	40,596	7.6
Commercial & Industrial Loans	40,117	8.9	72,765	17.3	89,338	21.2	114,545	22.8	131,233	24.6
Construction Loans	40,564	9.0	33,220	7.9	21,360	5.1	20,787	4.1	22,510	4.2
Other Loans	9,025	2.0	10,551	2.5	5,044	1.2	8,691	1.7	8,600	1.6
Farm Land Loans	1,871	0.4	1,732	0.4	1,584	0.4	1,425	0.3	1,383	0.3
Total Gross Loans	448,581	100.0	420,172	100.0	422,178	100.0	502,563	100.0	533,665	100.0

As illustrated in the above table, MCB is primarily a commercial lender with 76.3% of its loan portfolio in commercial mortgages and commercial & industrial loans, as of March 31, 2014.

MCB has four banking offices, of which two branches are located in upper census tracts; one is in an unknown census tract in Manhattan (New York County); and one is in Brooklyn (Kings County) in a moderate-income census tract. All branches are open during the hours of 8:30 AM to 4:30 PM, extending to 6:00 PM for one day at different locations during the week. The branch in Brooklyn, which is in a moderate-income census tract, is also open Sundays from 10:00 AM to 2:00 PM.

Supplementing the banking offices are automated teller machines (“ATMs”). Each branch has three ATMs and all dispense cash and accept deposits. MCB does not have off-site ATMs, but customers have the ability to access NYCE and PLUS network ATMs at various locations and other institutions.

Examiners did not find evidence of financial or legal impediments that had an adverse impact on MCB’s ability to meet the credit needs of its community.

Assessment Area

MCB’s assessment area is comprised of the five counties representing the New York City Region: Bronx, Kings, New York, Queens and Richmond.

There are 2,168 census tracts in the area, of which 292 are low-income, 578 are moderate-income, 654 are middle-income, 580 are upper-income, and 64 are tracts with no income indicated.

Assessment Area Census Tracts by Income Level							
County	N/A	Low	Mod	Middle	Upper	Total	LMI %
Bronx	10	129	101	64	35	339	67.8
Kings	13	108	269	234	137	761	49.5
New York	12	37	65	23	151	288	35.4
Queens	26	16	134	303	190	669	22.4
Richmond	3	2	9	30	67	111	9.9
Total	64	292	578	654	580	2,168	40.1

Demographic & Economic Data

Population and Income

The assessment area had a population of 8,175,133 during the examination period. About 11.9% of the population were over the age of 65; 80.9% were 16 or older; and 19.1% were under the age of sixteen.

Of the 1,842,289 families in the assessment area, 29.9% were low-income, 16.9% were moderate-income, 16.7% were middle-income and 36.6% were upper-income families. There were 3,047,249 households in the assessment area, of which 18.1% had incomes below the poverty level and 4.1% were on public assistance.

The weighted average median family income within the assessment area was \$65,513.

The Bronx and Kings County both had weighted average median family incomes significantly lower than the MSA. The average family incomes for these counties were \$42,639 and \$54,363, respectively. Queens County had a MSA median family income of \$64,928. Richmond and New York Counties exceeded the average MSA income in the assessment area. Richmond County had a MSA family income of \$83,600 and New York County had the highest MSA family income with an average of \$104,415.

Housing Characteristics

There were 3,343,424 housing units within the assessment area, with multifamily accounting for 60.0% and one-to-four family 40.0% of the units. Rental housing units made up 61.0% and owner-occupied 30.1% of all housing units.

Of the 2,040,592 rental housing units, 53.1% were in LMI census tracts while 46.9% were in middle- and upper-income tracts. Among the five counties in the assessment area, the Bronx had the highest percentage (81.9%) of renter-occupied units in LMI tracts and Kings County was second highest with 63.5%. Average monthly gross rent was \$1,123.

Of the 1,006,657 owner occupied housing units, 20.5% were in LMI census tracts while 79.5% were in middle- and upper-income tracts. The median age of the housing stock was 69 years and the median home value in the assessment area was \$526,503.

Business Demographics

There were 636,017 non-farm businesses in the assessment area. Of these, 71.9% were businesses with reported revenues of less than or equal to \$1 million, 5.4% reported revenues of more than \$1 million, and 22.7% did not report their revenues. Of all the businesses in the assessment area 78.4% were businesses with less than fifty employees, and 94.0% operated from a single location. The largest industries in the area were in services (44.6%), retail trade (15.1%), and finance, insurance & real estate (8.9%), while 14.2% of businesses were not classified.

Unemployment Rates

According to the New York State Department of Labor, the average unemployment rate for New York State for the evaluation period was 8.2%. Bronx County had the highest average unemployment rate at 12.5%, followed by Kings County with a rate of 9.9%. New York County had the lowest unemployment rate (7.7%). The annual average unemployment rate for the evaluation period decreased for New York State by approximately 10% from 8.6% in 2010 to 7.7% in 2013. Bronx County's four-year unemployment rate of 12.5% was 52.4% higher than the New York State rate.

Assessment Area Unemployment Rate						
	Statewide	Bronx	Kings	New York	Queens	Richmond
2010	8.6	12.8	10.3	8.1	8.7	8.8
2011	8.2	12.4	9.8	7.5	8.2	8.3
2012	8.5	12.8	10.0	7.8	8.4	8.7
2013	7.7	11.8	9.4	7.2	7.8	7.8
Avg. (4 yrs.)	8.2	12.5	9.9	7.7	8.3	8.4

Community Information

Community contacts included a community-based nonprofit organization focused on improving access for housing opportunities, resources, and information for South Asian Americans throughout New York City and a nonprofit corporation in central Brooklyn that partners with residents and businesses to improve their quality of life and transform the neighborhood into a safe, vibrant place to live, work and visit.

Community contacts indicated the need for more affordable rental housing since residents spend 50% or more of their income on rent. Further, they noted that banks should offer low cost deposit and loan products and services to help residents build up credit to improve their access to rental housing, homeownership opportunities, and employment.

PERFORMANCE STANDARDS AND ASSESSMENT FACTORS

DFS evaluated MCB under the intermediate small bank performance standards in accordance with GRS Parts 76.7 and 76.12, which consist of the lending test and the community development test.

The lending test includes:

- 1. Loan-to-deposit ratio and other lending-related activities;*
- 2. Assessment area concentration;*
- 3. Distribution by borrower characteristics;*
- 4. Geographic distribution of loans; and*
- 5. Action taken in response to written CRA-related complaints*

The community development test includes:

- 1. Community development lending;*
- 2. Community development investments;*
- 3. Community development services;*
- 4. Innovative or complex practices; and*
- 5. Responsiveness to community development needs*

The following factors were also considered in assessing the bank's record of performance:

- 1. Extent of participation by the board of directors or board of trustees in formulating CRA policies and reviewing CRA performance;*
- 2. Any practices intended to discourage credit applications;*
- 3. Evidence of prohibited discriminatory or other illegal credit practices;*
- 4. Record of opening and closing offices and providing services at offices; and*
- 5. Process factors, such as activities to ascertain credit needs and the extent of marketing and special credit related programs*

DFS derived statistics employed in this evaluation from various sources. MCB submitted bank-specific information both as part of the examination and on its Call Report submitted to the FDIC. DFS obtained aggregate lending data from the Federal Financial Institutions Examination Council and deposit data from the FDIC. DFS calculated LTD ratios from information shown in the bank's Uniform Bank Performance Report submitted to the FDIC.

DFS derived the demographic data referred to in this report from the 2000 and 2010 U.S. Censuses and the U.S. Department of Housing and Urban Development. DFS based business data on Dun & Bradstreet reports which Dun and Bradstreet updates annually. DFS obtained unemployment data from the New York State Department of Labor.

The assessment period included calendar years 2010 through 2013 and January through March 2014.

The community development test was given greater weight in this evaluation. MCB is primarily a commercial lender and has limited participation in one-to-four family lending.

Aggregate small business loan data are shown for comparative purposes only. MCB is not required to report this data. As such, MCB’s small business lending is not included in the aggregate data.

This is the first Performance Evaluation conducted by DFS since MCB converted to New York State charter in 2013.

Current CRA Rating: “Satisfactory”

Lending Test: “Satisfactory”

MCB’s small business, HMDA-reportable and other lending related activities were reasonable in light of the bank’s business strategy, aggregate and peer group activity, and the demographic characteristics of the assessment area.

Loan-to-Deposit Ratio and Other Lending Related Activities: “Outstanding”

MCB’s average LTD ratio was more than reasonable considering its size, business strategy, financial condition, and peer group’s lending activity.

During the evaluation period, MCB’s average LTD ratio was 94.8%, with a high of 105.1% for the quarter ended March 31, 2014 and a low of 84.7% for the period ended June 30, 2012. MCB’s overall LTD average was significantly higher (18.7%) than its peers¹ LTD average of 76.1%.

The table² below shows MCB’s LTD ratios in comparison with the peer group’s ratios for the last 17 quarters.

Loan-to-Deposit Ratios																		
	2010 Q1	2010 Q2	2010 Q3	2010 Q4	2011 Q1	2011 Q2	2011 Q3	2011 Q4	2012 Q1	2012 Q2	2012 Q3	2012 Q4	2013 Q1	2013 Q2	2013 Q3	2013 Q4	2014 Q1	Avg.
Bank	104.6	99.2	99.1	97.4	94.0	94.5	89.7	88.0	86.7	84.7	89.7	94.2	96.0	96.7	92.8	99.1	105.1	94.8
Peer	80.9	80.4	79.7	78.9	76.5	76.6	75.9	75.1	73.3	74.3	74.5	74.0	73.2	74.9	75.1	75.8	74.8	76.1

Assessment Area Concentration: “Outstanding”

During the evaluation period, MCB originated 95% by number and 93% by dollar value of its total HMDA-reportable and small business loans inside its assessment area. This

1 MCB’s peer group is peer group 3 – Insured commercial banks having assets between \$300 million and \$1 billion.

2 LTD ratios for MCB and its peer group taken from the Uniform Bank Performance Reports.

substantial majority of lending was an excellent record of lending inside of the assessment area.

HMDA-Reportable Loans:

MCB originated thirty-two HMDA-reportable loans during the evaluation period, of which twenty-nine, or 90.6% by number and 91.4% by dollar value, were made within the assessment area.

Small Business Loans:

MCB originated twenty-eight small business loans during the evaluation period, all of which were originated within the assessment area.

The following table shows the percentages of MCB's HMDA-reportable and small business loans originated inside and outside of the assessment area.

Distribution of Loans Inside and Outside of the Assessment Area										
Loan Type	Number of Loans					Loans in Dollars (in thousands)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
HMDA-Reportable										
2010	4	80.0%	1	20.0%	5	15,600	88.6%	2,000	11.4%	17,600
2011	1	100.0%	-	0.0%	1	2,000	100%	-	0.0%	2,000
2012	2	100.0%	-	0.0%	2	3,050	100%	-	0.0%	3,050
2013	19	90.5%	2	9.5%	21	36,319	90.8%	3,692	9.2%	40,011
2014 *	3	100.0%	-	0.0%	3	3,825	100%	-	0.0%	3,825
Subtotal	29	90.6%	3	9.4%	32	60,794	91.4%	5,692	8.6%	66,486
Small Business										
2010	1	100.0%	-	0.0%	1	800	100%	-	0.0%	800
2011	7	100.0%	-	0.0%	7	4,038	100%	-	0.0%	4,038
2012	7	100.0%	-	0.0%	7	3,589	100%	-	0.0%	3,589
2013	13	100.0%	-	0.0%	13	5,922	100%	-	0.0%	5,922
Subtotal	28	100.0%	-	0.0%	28	14,349	100%	-	0.0%	14,349
Grand Total	57	95.0%	3	5.0%	60	75,143	93.0%	5,692	7.0%	80,835
* January to March 31, 2014. MCB did not originate small business loans in 2014										

Distribution by Borrower Characteristics: "Needs to Improve"

The distribution of loans based on borrower characteristics demonstrated a more than reasonable rate of lending to small business owners but a poor rate of lending to LMI borrowers.

Overall, MCB originated 75.0% by number and 84.3% by dollar value of total business

loans to small businesses (those with gross annual revenues of \$1 million or less), compared to aggregate averages of 31.1% and 28.6%, respectively.

By contrast, MCB's mortgage lending was substantially in commercial loans,³ and MCB did not engage in a significant amount of residential (one-to-four family) lending. MCB originated a total of 19 loans for a total of \$32.6 million. No loans were originated to LMI borrowers; instead, all of MCB's 19 one-to-four family loans were made to borrowers with upper and unknown incomes.

The following tables provide summaries of MCB's small business and HMDA-reportable lending by borrower characteristics during the evaluation period.

³ Per Section 3, page 2 ("Gross Loans Outstanding") of this performance evaluation, MCB is primarily a commercial lender with 76.3% of its loan portfolio in commercial mortgages and commercial and industrial loans, as of March 31, 2014.

Distribution of Small Business Loans by Revenue Size of Business									
2010									
Rev. Size	Bank				Aggregate				Bus.Dem.
	#	%	\$000's	%	#	%	\$000's	%	%
Rev. <= \$1MM	1	100%	800	100%	21,946	16.8%	759,656	22.0%	74.9%
Rev. > \$1MM		0.0%		0.0%					5.3%
Rev. Unknown		0.0%		0.0%					19.8%
Total	1	100%	800	100%	130,596		3,457,353		100%
2011									
Rev. Size	Bank				Aggregate				Bus.Dem.
	#	%	\$000's	%	#	%	\$000's	%	%
Rev. <= \$1MM	7	100%	4,038	100%	56,624	33.5%	1,157,901	26.9%	65.1%
Rev. > \$1MM		0.0%		0.0%					3.7%
Rev. Unknown		0.0%		0.0%					31.2%
Total	7	100%	4,038	100%	169,041		4,306,803		100%
2012									
Rev. Size	Bank				Aggregate				Bus.Dem.
	#	%	\$000's	%	#	%	\$000's	%	%
Rev. <= \$1MM	5	71.4%	2,589	72.1%	69,494	39.5%	1,442,261	30.3%	70.7%
Rev. > \$1MM	2	28.6%	1,000	27.9%					5.0%
Rev. Unknown		0.0%		0.0%					24.3%
Total	7	100%	3,589	100%	176,102		4,759,546		100%
2013									
Rev. Size	Bank				Aggregate				Bus.Dem.
	#	%	\$000's	%	#	%	\$000's	%	%
Rev. <= \$1MM	8	61.5%	4,672	78.9%	70,718	44.0%	1,690,162	33.0%	71.9%
Rev. > \$1MM	5	38.5%	1,250	21.1%					5.4%
Rev. Unknown		0.0%		0.0%					22.7%
Total	13		5,922		160,893		5,117,318		100.0%
GRAND TOTAL									
Rev. Size	Bank				Aggregate				
	#	%	\$000's	%	#	%	\$000's	%	%
Rev. <= \$1MM	21	75.0%	12,099	84.3%		34.4%		28.6%	
Rev. > \$1MM	7	25.0%	2,250	15.7%					
Rev. Unknown	-	0.0%	-	0.0%					
Total	28		14,349						

Distribution of HMDA-Reportable Lending by Borrower Income				
2012				
Borrower Income	Bank			
	#	%	\$000's	%
Low		0.0%		0.0%
Moderate		0.0%		0.0%
LMI	0	0.0%	0	0.0%
Middle		0.0%		0.0%
Upper	1	50.0%	1,150	37.7%
Unknown	1	50.0%	1,900	62.3%
Total	2		3,050	
2013				
Borrower Income	Bank			
	#	%	\$000's	%
Low		0.0%		0.0%
Moderate		0.0%		0.0%
LMI	0	0.0%	0	0.0%
Middle		0.0%		0.0%
Upper	11	73.3%	21,263	77.6%
Unknown	4	26.7%	6,130	22.4%
Total	15		27,393	
2014				
Borrower Income	Bank			
	#	%	\$000's	%
Low		0.0%		0.0%
Moderate		0.0%		0.0%
LMI	0	0.0%	0	0.0%
Middle		0.0%		0.0%
Upper	2	100.0%	2,200	100.0%
Unknown		0.0%		0.0%
Total	2		2,200	
GRAND TOTAL				
Borrower Income	Bank			
	#	%	\$000's	%
Low		0.0%		0.0%
Moderate		0.0%		0.0%
LMI	0	0.0%	0	0.0%
Middle		0.0%		0.0%
Upper	14	73.7%	24,613	75.4%
Unknown	5	26.3%	8,030	24.6%
Total	19		32,643	

Geographic Distribution of Loans: "Satisfactory"

MCB's business and HMDA-reportable lending resulted in a reasonable rate of loans originated in LMI census tracts.

Business Loans:

The distribution of business loans based on the income level of the geography of the business demonstrated a reasonable level of lending in LMI census tracts.

Overall, and for every year during the evaluation period, the levels of lending in LMI census tracts were above the aggregate levels, as well as the business demographics in the assessment area. MCB originated 50% by number and 56.6% by dollar value of their business loans in LMI geographies, compared to the aggregate's levels of 25.1% and

23.3%, respectively.

The following table provides a summary of the distribution of MCB's business lending based on the income level of the geography.

Distribution of Small Business Lending by Geographic Income of the Census Tract									
2010									
Geographic Income	Bank				Aggregate				Bus.Dem.
	#	%	\$000's	%	#	%	\$000's	%	%
Low	1	100.0%	800	100.0%	7,760	5.9%	226,481	6.6%	8.9%
Moderate		0.0%		0.0%	22,536	17.3%	557,241	16.1%	21.2%
LMI	1	100.0%	800	100.0%	30,296	23.2%	783,722	22.7%	30.1%
Middle		0.0%		0.0%	28,353	21.7%	719,465	20.8%	22.1%
Upper		0.0%		0.0%	70,123	53.7%	1,858,456	53.8%	46.4%
Unknown		0.0%		0.0%	1,824	1.4%	95,710	2.8%	1.3%
Total	1	100.0%	800	100.0%	130,596	100.0%	3,457,353	100.0%	100.0%
2011									
Geographic Income	Bank				Aggregate				Bus.Dem.
	#	%	\$000's	%	#	%	\$000's	%	%
Low	1	14.3%	483	12.0%	11,192	6.6%	254,608	5.9%	9.0%
Moderate	1	14.3%	500	12.4%	31,953	18.9%	724,477	16.8%	22.2%
LMI	2	28.6%	983	24.3%	43,145	25.5%	979,085	22.7%	31.2%
Middle	1	14.3%	250	6.2%	38,321	22.7%	908,588	21.1%	23.1%
Upper	4	57.1%	2,805	69.5%	85,401	50.5%	2,322,262	53.9%	44.3%
Unknown		0.0%		0.0%	2,174	1.3%	96,868	2.2%	1.4%
Total	7	100.0%	4,038	100.0%	169,041	100.0%	4,306,803	100.0%	100.0%
2012									
Geographic Income	Bank				Aggregate				Bus.Dem.
	#	%	\$000's	%	#	%	\$000's	%	%
Low	1	14.3%	460	12.8%	13,374	7.6%	368,671	7.7%	9.3%
Moderate	4	57.1%	2,400	66.9%	30,387	17.3%	758,188	15.9%	20.5%
LMI	5	71.4%	2,860	79.7%	43,761	24.8%	1,126,859	23.7%	29.8%
Middle	1	14.3%	230	6.4%	39,630	22.5%	1,053,509	22.1%	22.9%
Upper	1	14.3%	499	13.9%	86,264	49.0%	2,301,869	48.4%	44.0%
Unknown	0	0.0%	0	0.0%	6,447	3.7%	277,309	5.8%	3.3%
Total	7	100.0%	3,589	100.0%	176,102	100.0%	4,759,546	100.0%	100.0%
2013									
Geographic Income	Bank				Aggregate				Bus.Dem.
	#	%	\$000's	%	#	%	\$000's	%	%
Low	2	15.4%	1,082	18.3%	13,768	8.6%	377,563	7.4%	9.2%
Moderate	4	30.8%	2,390	40.4%	29,022	18.0%	846,934	16.6%	20.3%
LMI	6	46.2%	3,472	58.6%	42,790	26.6%	1,224,497	23.9%	29.6%
Middle	2	15.4%	600	10.1%	36,854	22.9%	1,167,651	22.8%	22.5%
Upper	4	30.8%	1,750	29.6%	75,412	46.9%	2,431,577	47.5%	44.7%
Unknown	1	7.7%	100	1.7%	5,837	3.6%	293,593	5.7%	3.3%
Total	13	100.0%	5,922	100.0%	160,893	100.0%	5,117,318	100.0%	100.0%
GRAND TOTAL									
Geographic Income	Bank				Aggregate				Bus.Dem.
	#	%	\$000's	%	#	%	\$000's	%	%
Low	5	17.9%	2,825	19.7%		7.2%		7.0%	
Moderate	9	32.1%	5,290	36.9%		17.9%		16.4%	
LMI	14	50.0%	8,115	56.6%		25.1%		23.3%	
Middle	4	14.3%	1,080	7.5%		22.5%		21.8%	
Upper	9	32.1%	5,054	35.2%		49.8%		50.5%	
Unknown	1	3.6%	100	0.7%		2.6%		4.3%	
Total	28	100.0%	14,349	100.0%					

HMDA-Reportable Loans:

The distribution of MCB's HMDA-reportable loans based on the income level of the geography demonstrated reasonable rates of lending in areas of different income levels.

Although there were no loans extended in LMI geographies during 2011, 2012 and the first quarter of 2014, the overall distribution of loans originated in 2010 and 2013 compared favorably with the owner-occupied housing demographics and aggregate levels.

The following table provides a summary of MCB's HMDA-reportable lending distribution based on the income level of the geography.

Distribution of HMDA-Reportable Lending by Geographic Income of the Census Tract									
2010									
Geographic Income	Bank				Aggregate				OO HUs
	#	%	\$000's	%	#	%	\$000's	%	%
Low	2	50.0%	6,000	38.5%	2,306	3.8%	1,131,937	4.1%	3.3%
Moderate	1	25.0%	3,600	23.1%	8,951	14.8%	3,529,876	12.9%	17.3%
LMI	3	75.0%	9,600	61.5%	11,257	18.6%	4,661,813	17.0%	20.6%
Middle		0.0%		0.0%	16,997	28.1%	5,730,513	20.9%	34.4%
Upper	1	25.0%	6,000	38.5%	32,169	53.1%	16,925,089	61.7%	45.0%
Unknown		0.0%		0.0%	136	0.2%	122,968	0.4%	
Total	4		15,600		60,559		27,440,383		
2011									
Geographic Income	Bank				Aggregate				OO HUs
	#	%	\$000's	%	#	%	\$000's	%	%
Low		0.0%		0.0%	2,380	4.0%	1,720,989	5.6%	3.3%
Moderate		0.0%		0.0%	9,120	15.2%	4,826,095	15.7%	17.3%
LMI	0	0.0%	0	0.0%	11,500	19.2%	6,547,084	21.3%	20.6%
Middle		0.0%		0.0%	16,580	27.6%	5,864,886	19.0%	34.4%
Upper	1	100.0%	2,000	100.0%	31,797	53.0%	18,232,046	59.2%	45.0%
Unknown		0.0%		0.0%	151	0.3%	160,699	0.5%	
Total	1		2,000		60,028		30,804,715		
2012									
Geographic Income	Bank				Aggregate				OO HUs
	#	%	\$000's	%	#	%	\$000's	%	%
Low		0.0%		0.0%	2,536	3.7%	1,656,920	4.4%	3.5%
Moderate		0.0%		0.0%	9,303	13.5%	4,796,306	12.8%	17.0%
LMI	0	0.0%	0	0.0%	11,839	17.1%	6,453,226	17.2%	20.5%
Middle	1	50.0%	1,900	62.3%	17,474	25.3%	7,090,909	19.0%	33.6%
Upper	1	50.0%	1,150	37.7%	39,555	57.2%	23,601,475	63.1%	45.9%
Unknown		0.0%		0.0%	245	0.4%	273,098	0.7%	
Total	2		3,050		69,113		37,418,708		
2013									
Geographic Income	Bank				Aggregate				OO HUs
	#	%	\$000's	%	#	%	\$000's	%	%
Low	1	5.3%	550	1.5%					3.5%
Moderate	4	21.1%	6,983	19.2%					17.0%
LMI	5	26.3%	7,533	20.7%					20.5%
Middle	2	10.5%	4,123	11.4%					33.6%
Upper	12	63.2%	24,663	67.9%					45.9%
Unknown		0.0%		0.0%					0.0%
Total	19		36,319						
2014									
Geographic Income	Bank				Aggregate				OO HUs
	#	%	\$000's	%	#	%	\$000's	%	%
Low		0.0%		0.0%					
Moderate		0.0%		0.0%					
LMI	0	0.0%	0	0.0%					
Middle		0.0%		0.0%					
Upper	3	100.0%	3,825	100.0%					
Unknown		0.0%		0.0%					
Total	3		3,825						
GRAND TOTAL									
Geographic Income	Bank				Aggregate				OO HUs
	#	%	\$000's	%	#	%	\$000's	%	%
Low	3	11.5%	6,550	11.5%		3.8%		4.7%	
Moderate	5	19.2%	10,583	18.6%		14.4%		13.7%	
LMI	8	30.8%	17,133	30.1%		18.2%		18.5%	
Middle	3	11.5%	6,023	10.6%		26.9%		19.5%	
Upper	15	57.7%	33,813	59.4%		54.6%		61.4%	
Unknown	-	0.0%	-	0.0%		0.3%		0.6%	
Total	26		56,969						

Action Taken in Response to Written Complaints with Respect to CRA: “Satisfactory”

Neither MCB nor DFS received any written CRA-related complaints regarding MCB’s performance.

Community Development Test: “Satisfactory”

MCB’s community development performance demonstrated reasonable responsiveness to the community development needs of its assessment area, particularly through community development loans and investments, considering MCB’s capacity and the need for and availability of such opportunities in the area.

During the evaluation period, MCB originated \$67.1 million in new community development loans. MCB also made \$1.1 million in new community development investments and \$217,154 in community development grants.

A more detailed description of MCB’s community development activity follows.

Community Development Lending: “Outstanding”

During the evaluation period, MCB originated \$67.1 million in new community development loans. Total originated loans were 2.4% of annualized total assets. This demonstrated an excellent amount of community development lending during the evaluation period.⁴

Approximately 51% of MCB’s community development lending extended credit to projects that provided or supported community services, such as nursing facilities accepting Medicaid patients. Loans for affordable housing made up 32.2% of all community development loans, and 17.1% of all loans were made revitalize neighborhoods and provide economic development.

Community Development Loans				
Purpose	This Evaluation Period		Outstanding from Prior Evaluation Periods	
	# of Loans	\$000	# of Loans	\$000
Affordable Housing	6	21,630		
Economic Development	1	5,000		
Community Services	19	34,006		
Revitalize and Stabilize	5	6,500		
Total	31	67,136	0	0

⁴ For analysis purposes, renewals of lines of credit that occur during the evaluation period are considered new extensions of credit. However, the level of lending is reviewed across the time period of the exam.

Below are highlights of MCB's community development lending:

- MCB extended a \$3.7 million loan secured by a multi-tenant commercial building located in a moderate-income census tract. The borrower caters to small businesses and individuals in need of workspace. This loan specifically benefitted the Greenpoint area, a neighborhood in Brooklyn (Kings County) that presently is undergoing revitalization.
- MCB extended a \$2.5 million loan for a 160-bed skilled nursing facility that provides nursing and rehabilitation services to LMI individuals. This facility derived 62% of revenues from Medicaid.
- MCB extended an \$8.3 million term loan to fund five affordable multifamily housing projects in the Bedford-Stuyvesant section of Brooklyn. Sixty percent of the units are located in moderate-income census tracts.
- MCB made a \$5 million commitment to a loan fund specializing in U.S. Small Business Administration ("SBA") loans. Through this fund, MCB will purchase community development loans guaranteed by the SBA, which are extended to small businesses located in LMI areas or create jobs for LMI individuals.
- In 2012 MCB renewed a \$3.2 million loan to an organization that provides family shelter for single mothers and their children. The facility is located in a moderate-income census tract in Brooklyn.

Community Development Investments: "Satisfactory"

During the evaluation period, MCB made \$1.9 million in new community development investments. In addition, MCB made \$217,000 in community development grants. Qualified investments and grants constituted 0.08% of annualized total assets, demonstrating a reasonable amount of community development investments during the evaluation period.

Qualified investments provided affordable housing opportunities to LMI residents in New York City; MCB contributed 93.1% of the grants towards affordable housing and community service causes.

Community Development Investments and Grants				
	This Evaluation Period		Outstandings from Prior Evaluation Periods	
	# of Inv.	\$000	# of Inv.	\$000
CD Investments				
Affordable Housing	4	1,950		
Economic Development				
Community Services				
Other				
Total	4	1,950	0	0
CD Grants	# of Grants	\$000	Not Applicable	
Affordable Housing	7	109		
Economic Development				
Community Services	50	93		
Revitalize & Stabilize	3	15		
Total	60	217		

Below are highlights of MCB's community development investments and grants.

- MCB purchased \$950,000 worth of multifamily secured mortgage revenue bonds of different maturity dates issued by the New York City Housing Development Corporation ("NYCHDC").⁵ The proceeds were used to finance multifamily housing projects under NYCHDC's affordable housing programs: Low-Income Affordable Marketplace Program ("LAMP"), New Housing Opportunities Program ("New HOP") and Mitchell-Lama.⁶

MCB targeted these multifamily rental properties at individuals with incomes at or below 80% of area median income, mostly in LMI census tracts inside MCB's assessment area.

- MCB purchased \$500,000 worth of NYCHDC's 2014 Series B bonds with a maturity date of May 1, 2017. The 2014 Series B issue provided subsidy loans for approximately 300 affordable multifamily projects located in the five boroughs of NYC. MCB made the loans under the Participation Loan Program, Article 8-A Loan Program and the Mitchell-Lama Program.⁷

5 NYCHDC which commenced operations in 1972, is a public benefit corporation organized and existing under the laws of New York State, created for purposes of providing and encouraging the investment of private capital in safe and sanitary dwelling accommodations in the City of New York. NYCHDC provides affordable housing for families and persons of low income whose need for housing accommodations cannot be provided by the ordinary operations of private enterprise, or in areas designated as blighted, through the provision of low interest mortgage loans.

6 LAMP is an affordable housing program for those earning less than 60% of NYC's area median income (AMI). New HOP finances multifamily rental housing affordable to moderate- and middle-income families. Mitchell-Lama was created in 1955 and provides affordable rental and cooperative housing to moderate- and middle-income families.

7 HPD's Participation Loan Program was created to provide low interest loans to private owners of housing to rehabilitate housing for LMI households. Section 8, also known as the Housing Choice Voucher Program, provides

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- MCB purchased \$500,000 worth of the Series 2013 bonds issued by the New York State Housing Finance Agency to finance affordable housing rental projects pursuant to Section 236⁸ of the National Housing Act. The tenants in the rental properties securing the bonds met the income limit set by the program.
 - MCB made \$217,154 in grants to several nonprofit organizations that provide affordable housing and a range of community services to LMI individuals and small businesses. For example:
 - a. MCB contributed \$61,943 to the Federal Home Loan Bank of New York (“FHLBNY”), to help the Affordable Housing Program (“AHP”). Each year the FHLBNY sets aside 10% of its earnings to support the creation and preservation of housing for lower income families and individuals through its AHP. The FHLBNY also offers Community Lending Programs and the First Home Club, a grant program for first-time homebuyers.
 - b. MCB contributed \$46,500 to a nonprofit that assists in the development and revitalization of affordable homeowner and rental housing including rental housing programs serving households with incomes as low as 50% of area median income.
 - c. MCB contributed \$38,750 to a nonprofit that offers mentoring programs to the city’s neediest youth, including teenage mothers and children with developmental disabilities.

Community Development Services: “Needs to Improve”

During the evaluation period, three bank officers provided only limited community development services. MCB employees volunteered to provide technical assistance in community development lending, and mentoring to LMI children on budgeting and obtaining financial aid to go to college. MCB needs to improve its community development services in the future.

Innovative, Complex or Flexible Practices:

MCB did not make use of any innovative, complex or flexible products or practices during the evaluation period.

Responsiveness to Community Development Needs:

The volume of MCB’s community development loans that supported affordable health

funding for rent subsidies for eligible low-income families to locate decent, safe, and affordable housing.

⁸ The Section 236 program requires that tenants moving into Section 236 housing must have incomes at or below 80% of area median income.

services, and investments in multifamily housing through revenue bonds that funded affordable housing projects, demonstrated reasonable responsiveness to the assessment area's credit and community development needs.

Additional Factors

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

The Board of Directors reviews and approves the CRA Plan at least twice a year. CRA updates are given quarterly at senior management and risk management meetings.

During the evaluation period, MCB performed a CRA self-assessment conducted by a third party service provider.

Discrimination and other illegal practices

DFS examiners did not note evidence of practices by MCB intended to discourage applications for the types of credit offered by MCB.

DFS examiners did not note evidence of prohibited, discriminatory or other illegal practices.

Record of opening and closing offices and providing services at offices

MCB operates four full-service banking offices. Three of the branches, including the main office, are located in New York County, while the fourth branch is in Kings County. Of the four branches, two are located in upper-income census tracts, one in a moderate-income census tract, and one in a census tract of unknown income.

MCB did not open or close branches during the evaluation period.

Distribution of Branches within the Assessment Area							
County	N/A	Low	Moderate	Middle	Upper	Total	LMI
	#	#	#	#	#	#	%
Kings			1			1	100%
New York	1				2	3	0%
Total	1	-	1	-	2	4	25%

Process Factors

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

banking institution.

MCB ascertains the credit needs of the community primarily by interacting with nonprofit organizations to whom loans and grants are made.

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

MCB's marketing efforts included branch advertisements and community meetings showcasing loan and deposit products.

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

In addition to the community development loans described in the Community Development Lending section of this report, MCB extended \$2.2 million in loans to a nursing home and rehabilitation center primarily serving LMI individuals in Oneida and Nassau counties. The facilities are located in New York State but outside of MCB's assessment area.

GLOSSARY

Aggregate Penetration Rate

The number of loans originated and purchased by all reporting lenders in specified categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the assessment area.

Community Development

“Community development”:

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

Community Development Loan

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

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

Community Development Service

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

- Providing technical assistance on financial matters to nonprofit, tribal or government organizations serving LMI housing or economic revitalization and development needs;
- Providing technical assistance on financial matters to small businesses or community development organizations;
- Lending employees to provide financial services for organizations facilitating affordable housing construction and rehabilitation or development of affordable housing;
- Providing credit counseling, home buyers and home maintenance counseling, financial planning or other financial services education to promote community development and affordable housing;
- Establishing school savings programs for LMI individuals;
- Providing seminars for LMI persons on banking and bank account record-keeping;
- Making ATM “Training Machines” available for extended periods at LMI community sites or at community facilities that serve LMI individuals; and
- Technical assistance activities to community development organizations such as:
 - ❖ Serving on a loan review committee;
 - ❖ Developing loan application and underwriting standards;
 - ❖ Developing loan processing systems;
 - ❖ Developing secondary market vehicles or programs;
 - ❖ Assisting in marketing financial services, including the development of advertising and promotions, publications, workshops and conferences;
 - ❖ Furnishing financial services training for staff and management;
 - ❖ Contributing accounting/bookkeeping services; and
 - ❖ Assisting in fund raising, including soliciting or arranging investments.

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

Income Level

The income level for borrowers is based on household or family income. A geography's income is categorized by median family income for the geography. In both cases, the income is compared to the MSA or statewide nonmetropolitan median income.

Income level of individual or geography	% of the area median income
Low-income	Less than 50
Moderate-income	At least 50 and less than 80
Middle-income	At least 80 and less than 120
Upper-income	120 or more

Loans to Small Businesses

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

Low or Moderate Income ("LMI") Geographies

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

LMI Borrowers

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

LMI Individuals/Persons

Individuals or persons whose income is less than 80% of the area median family income. In the case where the individual resides in a MSA or PMSA, this would relate to the median family income for that MSA or PMSA. Otherwise, the area median family income would be the statewide non-metropolitan median family income. In all instances, the area median family incomes used to measure individual income levels are updated annually by HUD.

LMI Penetration Rate

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

Low-Income Housing Tax Credit (LIHTC)

A dollar for dollar tax credit for affordable housing, created under the Tax Reform Act of 1986, that provides incentives to invest in projects for the utilization of private equity in the development of affordable housing aimed at low income Americans. It is also more commonly called Section 42 credits in reference to the applicable section of the IRC. The tax credits are more attractive than tax deductions as they provide a dollar for dollar reduction in a taxpayer's federal income tax. It is more commonly attractive to corporations since the passive loss rules and similar tax changes greatly reduced the value of tax credits and deductions to individual taxpayers.

New Markets Tax Credit (NMTC)

The New Markets Tax Credits (NMTC) Program was established by Congress in December 2000 to stimulate economic and community development and job creation in low-income communities. It permits individual and corporate taxpayers to receive a credit against federal income taxes for making qualified equity investments in Community Development Entities (CDEs). The credit provided to the investor totals 39% of the cost of the investment and is claimed over a 7-year period. CDEs must use substantially all of the taxpayer's investments to make qualified investments in low-income communities. The Fund is administered by the US Treasury Department's Community Development Financial Institutions Fund (CDFI).

Qualified Investment

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

- Financial intermediaries (including community development financial institutions, community development corporations, minority- and women-owned financial institutions, community loan funds, micro-finance institutions and low-income or community development credit unions) that primarily lend or facilitate lending in LMI areas or to LMI individuals in order to promote community development;
- Organizations engaged in affordable housing rehabilitation and construction;
- Organizations, including, for example, small business investment corporations that promote economic development by financing small businesses;

- Facilities that promote community development in LMI areas or LMI individuals, such as youth programs, homeless centers, soup kitchens, health care facilities, battered women's centers, and alcohol and drug recovery centers;
- Projects eligible for low-income housing tax credits;
- State and municipal obligations, such as revenue bonds that specifically support affordable housing or other community development needs;
- Organizations serving LMI housing or other community development needs, such as counseling for credit, home ownership, home maintenance, and other financial services education; and
- Organizations supporting activities essential to the capacity of LMI individuals or geographies to utilize credit to sustain economic development, such as day care operations and job training programs that facilitate access to permanent jobs.