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May 29, 2018

Greg Sullivan
OCC-National Bank Examiners
111 Wall Street, 3rd Floor
New York, NY 10005

Via email: greg.sullivan@occ.treas.gov

RE: Citibank's CRA Performance Evaluation for 2012-2016

Dear Mr. Sullivan:

Empire Justice Center, Central Islip Civic Council, Economic Opportunity Council of Suffolk, Inc., La Fuerza Unida, Inc., Long Island Housing Services, Inc., SafeGuard Credit Counseling Services, Inc., and SUNY Farmingdale Small Business Development Center, all with offices in Nassau and/or Suffolk Counties, are sending these comments about Citibank and its CRA performance between 2012 and 2016 on Long Island.¹

As seen by Appendix A: Organizational Summaries, the above-named organizations have years of experience working with consumers, homeowners and small businesses in Nassau and/or Suffolk Counties.

INTRODUCTION

The Needs of Long Island

Long Island is often perceived as a mecca of wealth. If one were to quickly visit the “Gold Coast” Mansions on the North Shore of Long Island or the white sandy beaches of the South Shore they may likely leave with an impression that the majority of Long Islanders are very wealthy.

However, it does not take much prodding to observe the reality that underneath the façade of wealth, there are thousands of Long Islanders living in poverty. This face of Long Island struggles to get by on very low wages, food stamps, or worse, at risk of homelessness. As of

¹ The terms “Long Island” and “Nassau/Suffolk Counties” will be used interchangeably in this letter. They both mean Nassau and Suffolk Counties.

January 2017, there were 3,937 homeless Long Islanders.²

Long Island's poverty rate is on the rise. The poverty rate has increased from 5.5% in 2011 with 152,425 Long Islanders living in poverty to 6.6% in 2015 with 185,415 Long Islanders living in poverty. This is the highest it has been since 1959.² Although this rate is half the New York average, the rate is very deceiving. The Federal Poverty level for a family of four is \$24,000, and the cost of living on Long Island is one of the highest in the country. This means that families above the poverty rate are still subject to homelessness and living paycheck to paycheck. Paule Pachter, CEO of Long Island Cares, a Hauppauge-based regional food bank, states that "agencies are seeing an increase between 10% and 25% in the number of Long Islanders turning to pantries". One "can't live on the current poverty [threshold] on Long Island."³ Many Long Islanders making more than the Federal Poverty level of \$24,000 a year are still struggling but don't qualify for government assistance.

Some will blame the "pockets of poverty" on Long Island's long history of segregation. This segregation was rooted in the initial housing boom created by William Levitt, who created housing for veterans after World War II.³ Only whites were allowed to purchase these homes in "Levittown."⁴ According to the Citi-supported Policy Link report, Long Island continues to be among the country's most racially segregated regions.⁵ Between 2010 and 2014 about 42% of census block groups – census tracts with a population between 600 and 3,000 people- did not have a black resident.⁶ Black Long Islanders are almost three times as likely as white Long Islanders to live below the poverty threshold; 12.1% of blacks live in poverty as compared to 4.3% of whites. Nearly 9% of Blacks are unemployed.⁷ High unemployment tends to be concentrated in the region's communities of color, such as Hempstead Village, where nearly 1 in 5 people is unemployed.⁸

The wealth-poverty disparity is clearly a growing issue on Long Island. The Long Island Association released a study, "Long Island's Thinning Middle Class," portraying the region as increasingly polarized, with more incomes both at the bottom and the top.⁹ The study concluded

² Long Island Coalition for the Homeless, *Homeless County Results* (Jan. 27, 2017)

www.addresssthehomeless.org/homeless-count-2

²Olivia Winslow, *LI's Poverty Rate Highest Since 1959*, Newsday (Mar. 27, 2017), <http://www.newsday.com/long-island/li-s-poverty-rate-highest-since-1959-report-says-1.13325091>

³Editorial Board, *Long Island's High Cost of Living Can't Go On*, Newsday (Apr. 24, 2015), <http://www.newsday.com/opinion/editorial/long-island-s-high-cost-of-living-can-t-go-on-1.10328771>

³ William Levitt, *Entrepreneur* (Oct. 10, 2008), <https://www.entrepreneur.com/article/197662>

⁴ Ibid.

⁵ *An Equity Profile of Long Island*, PolicyLink (2017),

http://www.policylink.org/sites/default/files/LongIslandProfile_final.pdf.

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.

⁹ *Long Island's Thinning Middle-Class*, Long Island Association (Oct. 1, 2016),

<https://chambermaster.blob.core.windows.net/userfiles/UserFiles/chambers/2181/CMS/LIA-Income-Distribution-Report-3.pdf>

that while numbers increased in the upper income and low income brackets, the middle class itself was becoming a thinner slice of the region's population.¹⁰

In addition, the demographics of Long Island have changed dramatically. The influx of immigrants, and the fact that many of these groups have the highest rate of population growth, makes it imperative that key sectors of the economy have the language and cultural skills to meet their needs. By 2015, there were 526,000 immigrants living on Long island, making up 18% of the population.¹¹ The top 5 countries of birth for Long Island Immigrants are: El Salvador (14%) India (7%) Dominican Republic (5%) Jamaica (4%).¹² Gel Ross, a research associate at Policy Link, said of Long Island's racial and ethnic composition: "...By 2030, Long Island's racial composition will be 52% white," down from 67% in 2014.¹³ "In the early 2030s, it is projected to become a majority people of color," Ross said.¹⁴ After 2030, the same group that has been left behind will become the majority. This demonstrates the importance of providing language access assistance to pre-purchase and post-purchase home ownership counseling, among other matters. Access to products and banking contacts must be available in several languages in order to mirror the community.

Another issue is that the high cost of rental properties leave Long Islanders with little to no savings to put towards homeownership.¹⁵ The median asking rent in Suffolk ranges from \$1722/month to \$1803/month. The median asking rent in Nassau is \$2220/ month.¹⁶

As can be seen by the exorbitant cost of rentals on Long Island, the need for wealth building through homeownership is critical, especially for people of color. One will never get out of the cycle of poverty being a renter. Long Island's housing crisis can be addressed in two broad ways: by increasing the supply of affordable rental housing by investing in affordable housing projects and by helping more families of color and low-moderate income families become homeowners via reentering the CRA mortgage market and supporting nonprofits working with first-time homebuyers.

There is great opportunity for investment, as well as a great need on Long Island, in the arena of small business lending. With small businesses comprising nearly 90% of business establishments in Long Island, the outlook for small business is a key indicator for Long Island's recovery.¹⁷ The need exists for great expansion and the infusion of capital to retain current businesses and to create new small businesses. This could become the epicenter of Long Island's growth. It is critical that the workforce is supported. Wages must be comparable to the cost of living on Long

¹⁰ Ibid.

¹¹ *An Equity Profile of Long Island*, PolicyLink (2017),

<http://www.policylink.org/sites/default/files/LongIslandProfile-final.pdf>

¹² *New Americans on Long Island: A Vital Fifth of the Economy*, report by Fiscal Policy Institute, May 2015

¹³ *An Equity Profile of Long Island*, PolicyLink (2017),

<http://www.policylink.org/sites/default/files/LongIslandProfile-final.pdf>.

¹⁴ Ibid.

¹⁵ Editorial Board, *Long Island's High Cost of Living Can't Go On*, Newsday (Apr. 24, 2015),

<http://www.newsday.com/opinion/editorial/long-island-s-high-cost-of-living-can-t-go-on-1.10328771>

¹⁶ John A. Rizzo, *LIA Monthly Economic Report*, Long Island Association (May 2017),

<https://chambermaster.blob.core.windows.net/UserFiles/Chambers/2181/CMS/LIA-Monthly-Economic-Report-May.pdf>

¹⁷ Ibid.

Island, and small businesses must be able to have a relationship with their local banks to turn to for commercial needs, capital, and support.

Citibank's Role

In 2016, Citibank was the 3rd largest depository on Long Island, with 66 offices and \$13.1 billion in deposits (10.56% of all FDIC deposits) in the Nassau/Suffolk MSA market. (See FDIC Marketshare table, Table 1 in Appendix B.) Given Citibank's significant depository presence on Long Island, we believe that the bank should have a significant CRA presence as well.

Empire Justice Center staff had two conference calls (May 17th and 25th) with Citibank staff members to discuss some of the bank's initiatives on Long Island. During the second call, Citi staff answered clarification questions of Empire Justice, and Empire Justice staff shared some of their thoughts about the work of Citi on Long Island. This letter incorporates some of information from those discussions.

A terrific opportunity exists for Citibank to expand its support of the Long Island community. As advocates for low-moderate income families and communities of color, the undersigned organizations believe it is a prudent business model to market to these communities. Properly qualified loan products—mortgage, consumer and small business—must be developed and/or marketed. Access to jobs, credit repair, access to credit, first time homebuyer opportunities, community development and business development all are not only a prudent business model for a bank, but it is also a CRA obligation that a player such as Citibank, with \$13.1 billion in deposits on Long Island, return some of these deposits as investments, loans and services to the community.

FRINGE BANKING AND CONSUMER LOAN PRODUCTS

Introduction

All New Yorkers must have access to mainstream financial institutions. Those institutions must provide access to safe and affordable products, including low cost bank accounts, small dollar loans, home repair loans, and auto loans.

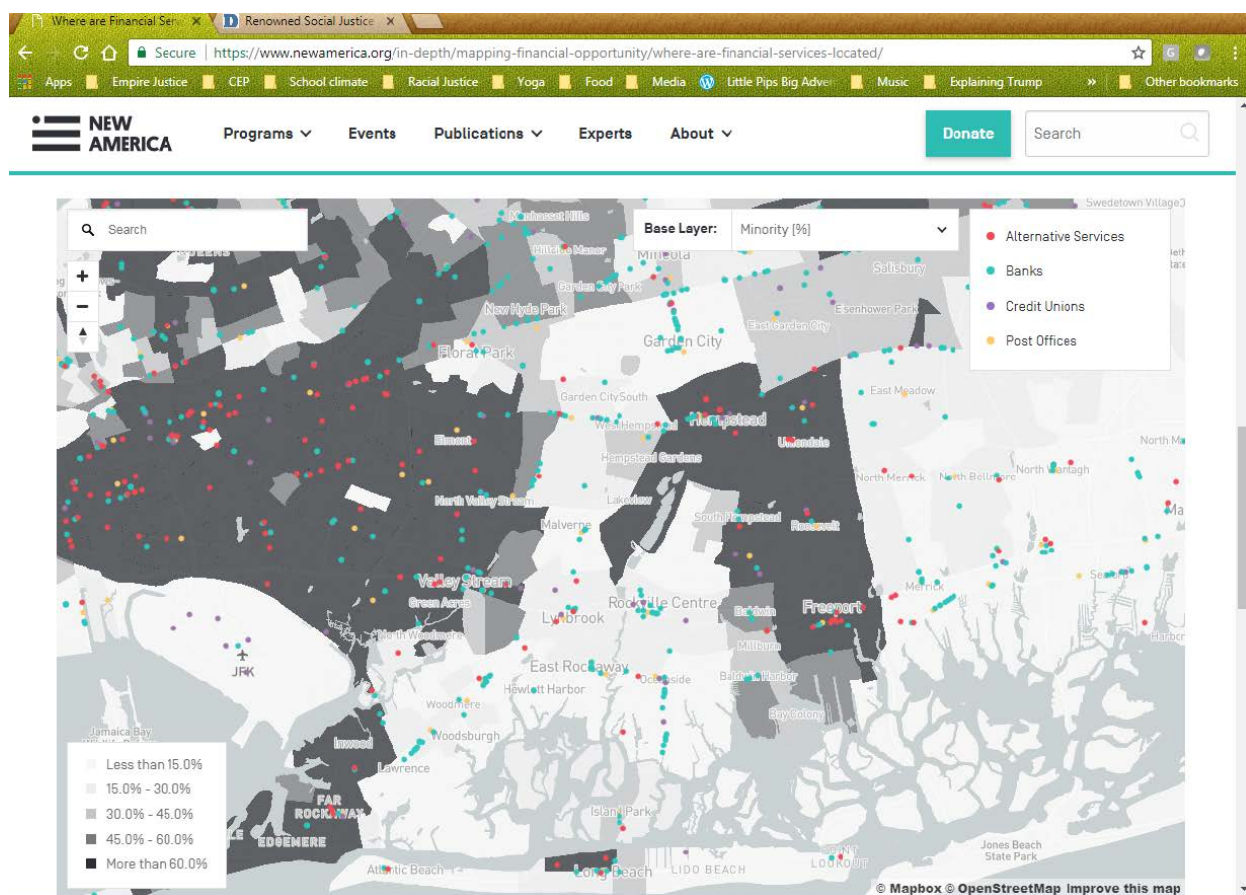
As banks have fled low and moderate-income neighborhoods and communities of color, they have been replaced by the fringe financial industry that charges predatory terms for check cashing, small dollar, and home repair loans.¹⁸

In Mapping Financial Opportunity, the New America Foundation has mapped where traditional bank and credit union branches, alternative services and post offices are located for the entire country.¹⁹ Many low-moderate income and majority non-white neighborhoods do not have bank or credit union branches and instead have alternative services.

¹⁸ http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2699279

¹⁹ <https://www.newamerica.org/in-depth/mapping-financial-opportunity/where-are-financial-services-located/>

For example, the image below from the website shows the various financial services in Nassau County along with the percent minority by census tract (the darkest is 60% or more minority). Note that the highest concentrations of alternative financial services (red dots), and lower concentrations of banks (blue dots) are in the communities with 60% or more people of color. In comparison, many of the communities with the lowest concentrations of people of color have several banks in a row competing for the residents' business.



African American and Latino borrowers and neighborhoods have historically been targeted for predatory home loans. While, thanks to Dodd-Frank and strong NYS laws, most predatory mortgage lending is currently shut down. However, this spring, the Senate and House passed legislation that will substantially weaken consumer protection and reduce public access to data. The president is expected to sign the bill any day.²⁰

In August 2017, the New York Federal Reserve updated its interactive report, “Community Credit: A New Perspective on America's Communities.” This report shows that, while over 96% of adults on Long Island are included in the credit economy, 9% and 10% of these adults in Nassau and Suffolk Counties, respectively, are experiencing credit stress, meaning they are weak (60+ days overdue for all 4 quarters of past year) or struggling (60+ days overdue for 1-3 quarters last year). These consumers don’t have access to safe and affordable small dollar loans

²⁰ <https://www.nytimes.com/aponline/2018/05/22/us/politics/ap-us-congress-banking.html>.

to respond to emergencies. They use subprime products that put their financial security at further risk. The information in the NY Federal Reserve's report shows us that mainstream financial institutions **MUST develop safe and affordable loan products that build assets and wealth for all residents**, with an emphasis on supporting opportunity for those who live paycheck to paycheck.²¹

Borrowers and communities of color are targeted for higher cost consumer products. The providers of these products are subject to little or no regulation and they are adversely impacting the ability of Black and Latino families to save for a home, education or retirement. Wealth is stripped from these communities by check cashers, payday lenders, and auto dealers. A study by the New York Office of the Public Advocate found that a customer with an annual income of \$17,000 pays \$250 in check cashing fees instead of \$60 to a bank for comparable services.²²

Consumers have to resort to rent-to-own stores instead of being able to obtain a small dollar loan to purchase an item at market price. Instead, they pay 3-4 times the cost of an item and, even then, have it repossessed if they miss a single payment.

The lack of access to small dollar loans results in black communities being disproportionately sued for small, unpaid bills, which further impacts their credit scores and ability to obtain prime credit. Pro Publica's research on these lawsuits points to the lack of wealth in black communities as a contributing factor. Typical black households have a net worth of \$11,000 vs \$142,000 for white households.²³ The wealth gap between black and white families has increased since the Great Depression.²⁴ As housing prices have rebounded since the Great Recession in white neighborhoods, home equity has increased. Minority neighborhoods have not seen a similar rise in housing prices.²⁵

In light of these factors, safe affordable products are essential for those consumers. The products should be marketed to un- and underbanked consumers. The interest rate and fees charged should be commensurate with the true risk of making such loans.

Checking accounts, overdrafts and credit cards

According to the January 26, 2018 comments submitted by the Association for Neighborhood & Housing Development (ANHD), Citibank's basic full service "Simple checking" account costs

²¹ FEDERAL RESERVE BANK of NEW YORK. August 2017. Community Credit : A New Perspective on America's Communities. As found at: <https://www.newyorkfed.org/data-and-statistics/data-visualization/community-credit-profiles/index.html>.

²² Squires and O'Connor, *Fringe Banking in Milwaukee: The Rise of Check Cashing Businesses and the Emergence of Two-Tiered Banking System*. (1997) at 5,6, as cited by Saunders, "The impact of Treasury's Proposed Regulation under the "EFT 99" Provisions of the Debt Collection Improvement Act of 1996 On the Poor, the Elderly and the 'Unbanked.'" (1997) at note 13, at: http://www.nclc.org/images/pdf/other_consumer_issues/exempt_public_benefits/testimony_eft99_debt_collecti_on_improvement_act_97.pdf.

²³ <https://www.propublica.org/article/debt-collection-lawsuits-squeeze-black-neighborhoods>

²⁴ <http://www.pewresearch.org/fact-tank/2014/12/12/racial-wealth-gaps-great-recession/>

²⁵ <http://www.businessinsider.com/great-recession-exacerbated-a-big-racial-disparity-in-the-housing-market-2015-6>

\$12 per month and requires a minimum balance of \$1500 or two transactions (direct deposit and one bill pay) to waive it, which can be challenging for some people to meet.

We appreciate that they also offer their Access account. This is a lower-cost checkless checking account that does not allow for overdrafts at all and the \$10 fee can be waived multiple ways with one transaction (online bill pay, \$1500 minimum balance, or direct deposit). ANHD has heard that in some branches staff help customers opening up the account to set up a system to avoid that monthly fee.

The December 2017 Pew report on overdraft use²⁶ documents that 3 out of 4 customers do not understand that they can choose to have the transaction declined when they have insufficient funds. Banks do not communicate effectively about how to use overdrafts. Even when customers have talked to bank staff, their understanding of overdraft programs is low.

Through the first three quarters of 2016, 626 large banks reported collecting \$8.4 billion in revenue from overdraft and NSF fees, an increase of 3.6 percent over the same period in 2015. **We are pleased to see that Citibank is not among the top 10 banks with the most overdraft/NSF fees.**²⁷ Moreover, according to complaints filed with the CFPB between 1/1/2015 and 9/30/2016, Citibank had only 49 complaints, or 0.02 complaints per 10,000 accounts, related to “Problems Caused by My Account Being Low;” and its fees were by far the lowest of those noted in the report, \$6.38 per account.²⁸

Also according to ANHD’s comments, Citibank is one of the few banks to have adopted all of Pew’s best practices and three of the four better practices on their checking accounts. They do not allow for overdrafts on ATM withdrawals and point of sales debit cards. They do not reorder transactions from high to low, which increases the chance of an overdraft, they limit the number of overdrafts per day, and they do not have an extended overdraft fee. They only lack a trigger before an overdraft is charged.

ANHD also noted that Citibank offers a secured credit card to build or repair credit. It has a low barrier to entry (\$200 minimum deposit) and now has no annual fee. We encourage Citi to continue this, and also to explore other types of credit building products such as credit building loans and the Lending Circles the bank has supported in the past.

Small dollar loans

Thirty percent of American households do not have the financial resources to meet an emergency and 44% do not have resources to meet a three-month emergency. In light of this, a **closed-end small dollar loan product** can help such families meet this need.

²⁶ <http://www.pewtrusts.org/en/research-and-analysis/issue-briefs/2017/12/overdraft-does-not-meet-the-needs-of-most-consumers>

²⁷ “From March 1, 2012, through November 14, 2016, there were 10,617 complaints submitted to the CFPB in the category “Bank Account/ Service” with the issue “Problems Caused by My Account Being Low.””

<https://uspirg.org/reports/usp/big-banks-big-overdraft-fees>

²⁸ Ibid.

A local Rochester area credit union has successfully piloted, and expanded a small dollar loan for its customers.²⁹ Since its inception, the loan has been widely marketed, is available online, has a quick approval process and allows the borrower time to repay. As shown in Rochester and by the NY Fed report, this is an important community credit need.

Advocates on Long Island have shared stories about consumers needing as little as \$1,000 to cover an emergency and are unable to get it. This causes them to begin to default on their mortgage.

Citi shared in its first call with Empire Justice that the bank does offer consumer loans, such as personal installment loans and lines of credit, through its retail units. Staff also noted that customers with a Citi credit card, not just those with bank accounts, are eligible to apply for a personal installment loan.

On the second call, Citi shared that it is developing a program to help consumers develop credit in a responsible way. It includes working with CDFIs to develop small dollar loan products and provide financial literacy, as well as working one-on-one with consumers.

We appreciate the work Citi is doing in this area and urge Citi to ensure that any current and future personal and small dollar loan products fit the criteria in the recent guidance of the OCC.³⁰

Auto loans

Reports, enforcement actions and local practices have documented a host of abusive and deceptive practices in auto lending in the last year. A December 2016 New York Times editorial raised alarms about these practices and noted a rise in delinquencies.³¹ In October 2017, the NY Attorney General announced a settlement with 2 auto dealer groups over deceptive practices including charging customers for after-sales credit repair.³² An October 2017 NCLC report documented that optional products, such as service contracts, “involves large mark-ups and arbitrary and discriminatory pricing for consumers.”³³

At an October 2017 meeting with the New York Department of Financial Services, a Rochester community development financial institution (CDFI) shared that its African American and Latino members are regularly channeled into subprime loans without their credit being pulled by some dealers. In contrast, white borrowers are channeled into prime loans without their credit being pulled.

Not only are these junk add-ons unfairly priced, but the predatory pricing means that borrowers owe much more than the car is worth. The CDFI was approached by its members to see if they could refinance the loans, but the high loan-to-values (LTVs) of the cars made it impossible.

²⁹ <https://www.esl.org/personal/loans/short-term-loan>

³⁰ <https://www.occ.gov/news-issuances/bulletins/2018/bulletin-2018-14.html>

³¹ https://www.nytimes.com/2016/12/21/opinion/an-avoidable-crash-in-car-loans.html?_r=0

³² <https://ag.ny.gov/press-release/ag-schneiderman-announces-over-1-million-settlements-two-auto-dealer-groups-deceptive>

³³ <https://www.nclc.org/issues/auto-add-ons-add-up.html>

Consumers are put into loans such that LTVs are as high as 145% as soon as the car leaves the lot.

This all indicates that fairly and affordably priced auto loans for used and new cars is an important community credit need. A Rochester area pilot program is described below.

Driven2Success is the auto loan program that Consumer Credit Counseling Services of Rochester (CCCS) is piloting with the Genesee Coop FCU. CCCS is helping people who have completed workforce development programs to get qualified for an affordable car loan. CCCS coaches the clients on credit and budget improvements and then builds a strong loan application that is presented to Genesee Coop. To date, two borrowers have been approved and 100 more are in coaching. A financial institution has funded a loss reserve fund so underwriting/lending can be more flexible.

Abusive payday loans fill a void caused by the lack of safe affordable small dollar products. Similarly abusive car loans for low value used cars force low wage workers with subprime credit to take on such loans in order to work. Just as predatory mortgages resulted in foreclosures and destroyed credit, auto loans made to fail will have the same tragic consequences. However, the subprime auto lending market is smaller than the mortgage market, so failed auto loans won't have the same widespread economic consequences to the entire economy. Still, banks need to develop safe affordable alternatives for low-moderate income borrowers who need a used auto loan.

According to Citi staff, Citi does not currently do direct and indirect auto lending, having exited these areas several years ago. Due to the limited public transportation, particularly in remote areas, people on Long Island need affordable, reliable cars to get to work and appointments. We urge Citi to consider re-entering these markets to offer responsible new and used auto loans, while assuring that auto dealers are not discriminating in their mark-up of the loans.

Conclusion

The Long Island residents experiencing credit stress, as documented in the NY Federal Reserve study, are unlikely to benefit from the mortgage lending and small business products offered by banks in Nassau and Suffolk Counties. These residents need transparent, safe, and affordable checking accounts, regulated small dollar loans and responsible used auto loans. We are pleased to see that Citibank is already supporting these consumers with an affordable checkless checking account, limiting overdrafts and their fees, and offering a credit building credit card.

We look forward to working with Citibank to develop and market products to meet the need of residents for fairly priced emergency and non-emergency closed-ended small dollar loans and responsible auto loans for used cars.

CITIBANK'S MORTGAGE LENDING IN NASSAU/SUFFOLK MSA and UNDERSERVED COMMUNITIES

In 2016, Citigroup ranked 3rd in depository market share with 66 offices and \$13.11 billion in deposits (10.56% of all FDIC deposits) in the Nassau/Suffolk MSA market. (See FDIC Marketshare table, Table 1 in Appendix B.)

We examine Citigroup's total mortgage lending and home purchase lending in relation to its peers, the other top depositories in the Nassau/Suffolk MSA, using the 2016 HMDA data. The 2015 top depository lending tables are also attached for comparison purposes. To provide additional context, we then share some maps of Nassau and Suffolk Counties showing where lending is and is not happening.

Citigroup's Mortgage Lending Compared to Its Peers

Total Mortgage Lending Market Share

First, we compared the total number of mortgages originated in 2016 among the top 10 banks with the largest deposits in the Nassau/Suffolk MSA. These banks have branches and thus CRA obligations in the Nassau/Suffolk MSA. As seen in Table 2, Appendix B, Citigroup originated a total of 1,299 mortgage loans in 2016, capturing about 3% of the Nassau/Suffolk MSA market. While Citigroup's total lending market share is less than a third of its depository market share of 10.56%, the bank's 2nd place ranking in MSA mortgage lending among the top 10 depositories is slightly better than its 3rd place 2016 depository ranking. Still, Citigroup is at a sluggish pace of lending as compared to its depository market share.

We would expect a bank's market share among various traditionally underserved communities to be at least that of its MSA market share. Citigroup only met this standard in loans to low-moderate income households. In 2016 Citigroup captured:

- 2% of total lending market among Black and Latino households, and ranked 2nd among the top 10 banks
- 3% of the market among low-moderate income households, and ranked 2nd among the top 10 banks
- 2% of the market in low-moderate income census tracts, and tied for 2nd among the top 10 banks
- 2% of the market in minority census tracts, and ranked 2nd among the top 10 banks

Though Citigroup's ranking compared to its peers across each underserved category is more favorable than its MSA ranking, its overall levels of lending are exceedingly low when compared to the bank's depository market share.

Together, the top 10 depositories only captured 15% of the Nassau/Suffolk total lending market, indicating that most loans are being originated by non-depository mortgage lenders and credit unions. These entities, which do not have CRA obligations, along with smaller depositories, captured the other 85% of the Nassau/Suffolk total lending market.

Citigroup's ranking compared to the average of the Top 10 banks in terms of lending distribution to black and Hispanic households and in minority census tracts is consistent with the rankings above, with Citigroup sitting in 2nd place. Its distribution of loans to low-moderate income households and in low-moderate income census tracts was discouraging, where Citigroup ranked 4th and tied for 5th, respectively.

Other financial institutions (OFI) had a higher percentage of their loans going to each category examined when compared to the average of the top 10 banks (and Citigroup), with the exception of low-moderate income households, where lending rates were comparable between the Top 10 banks and OFI. Given their huge depository market share, all of these banks, including Citigroup, need to do more outreach to and develop creative products that meet the needs of these communities and populations.

While not discussed here, see also Table 3 in Appendix B for how Citigroup compared to its peers in 2015 with respect to its number of loans.

Total Dollar Volume Lending Market Share

Next, we compared the dollar volume of total mortgage lending in 2016 among the top 10 banks in Nassau/Suffolk MSA with the largest deposits. As seen in Table 4, Appendix B, Citigroup originated a total of \$533.13 million in mortgage loans in 2016, capturing about 4% of the Nassau/Suffolk MSA market. While Citigroup's total lending market share is dramatically less than its depository market share of 10.56%, the bank's 2nd place ranking in MSA mortgage lending among the top 10 depositories is slightly better than its 3rd place 2016 depository ranking. Citigroup also captured more of the dollar volume market in 2016 compared to its market share in number of loans. Still, Citigroup has room to improve its mortgage lending market share.

We would expect a bank's market share among various traditionally underserved communities to be at least that of the MSA market share. Citigroup did not meet this standard for any of the categories examined. In total dollar volume of lending to the different communities in the Nassau/Suffolk MSA, in 2016 Citigroup captured:

- 2% of the dollar volume market among Black and Latino households, and ranked 2nd among the top 10 banks
- 3% of the low-moderate income household market, and ranked 2nd among the top 10 banks
- 2% of the low-moderate income census tract market, and tied for 2nd among the top 10 banks
- 2% of the minority census tract market, and ranked 2nd among the top 10 banks

Together, the top 10 depositories only captured 17% of the Nassau/Suffolk total dollar volume lending market, indicating that most loans are being originated by non-depository mortgage lenders and credit unions. These entities, which do not have CRA obligations, along with smaller depositories, captured the other 83% of the Nassau/Suffolk market.

Citigroup's lending distribution within the categories examined is exceedingly poor compared to both AFI and OFI. In 2016:

- 8% of Citigroup's dollars went to black and Latino households, compared to 14% for AFI and 15% for OFI
- 11% of Citigroup's dollars went to low to moderate income households, compared to 15% for AFI and 16% for OFI
- 6% of Citigroup's dollars went to homes in low to moderate income census tracts, compared to 10% for AFI and 11% for OFI
- 6% of Citigroup's dollars went to homes in minority census tracts, compared to 10% for AFI and 10% for OFI

While not discussed here, see also Table 5 in Appendix B for how Citigroup compared to its peers in 2015 with respect to its dollar volume lending.

Home Purchase Lending Market Share

As seen in Table 6 in Appendix B, Citigroup originated 928 home purchase loans in 2016, capturing 4% of the MSA's home purchase lending market. This makes Citigroup the 2nd largest home purchase lender among the top 10 depositories in 2016, slightly better than its 3% market share of total mortgage loans and its 3rd place depository market share ranking, but far short of its 10.56% depository market share.

Citigroup underperformed among each underserved category when compared to its overall MSA home purchase market share, though it performed better than most of its peers. In 2016, Citigroup captured:

- 3% of the home purchase loan market among Black and Latino households, and tied for 1st among the top 10 banks
- 3% of the market among low-moderate income households, and ranked 2nd among the top 10 banks
- 3% of the market in low-moderate income census tracts, and ranked 2nd among the top 10 banks
- 3% of the market in minority census tracts, and tied for 2nd among the top 10 banks

Together, the top 10 depositories only captured 17% of the Nassau/Suffolk home purchase lending market, meaning that other lenders captured the other 83% of the market.

As seen by Table 11 in Appendix B, only four of the top 12 depositories are among Nassau/Suffolk's top 20 home purchase lenders in 2015, but Citigroup is one of them. Wells Fargo, the area's top home purchase lender with 10.7% of the market, was the area's 14th largest bank in 2016, so it did not make the comparison list. Most of the top home purchase lenders are mortgage banks/companies and credit unions, which do not have CRA obligations; these top lenders captured almost 35% of the market, double that of the top depositories.

While not discussed here, see also Table 7 in Appendix B for how Citigroup compared to its peers in 2015 with respect to its home purchase lending.

Mapping Long Island's Mortgage Lending

Another way to look at lending is by mapping the number of loans by census tract and overlaying that with neighborhood demographics. As seen by the maps in Appendix C, we did this for Nassau and Suffolk County, mapping the total and home purchase lending of all HMDA reporters to give context as to where, geographically, lending is occurring or where there are low levels of lending. We believe the OCC will find these maps useful to understand the mortgage lending landscape on Long Island and to use as a basis for reviewing where Citibank is and is not lending.

Nassau County

In 2015, there were 17,776 mortgage loans originated in Nassau County, an average of 62 loans per census tract. Figure 1 in Appendix C shows the total loan originations of all HMDA reporters by census tract and neighborhood demographics (tracts less than 80% of area median family income and tracts 50-100% non-white) for Nassau County. The map indicates that mortgage lending is generally spread throughout most of Nassau County, with tracts of average or above average lending (green and blue) throughout the county. Some sections of central, south central and northeastern Nassau County, however, are red, showing significantly less lending than the average. Also, most of the low-to-moderate income communities (less than 80% of area median family income) and/or communities of color (50-100% non-white) have lending that is below the county average (red and yellow tracts with hash marks). These areas include: Inwood, Hempstead, Uniondale, Roosevelt, Freeport and New Cassel.

There were 9,951 home purchase originations in Nassau County in 2015, an average of 35 loans per census tract. Figure 2 in Appendix C shows the home purchase originations of all HMDA reporters by census tract and neighborhood demographics (tracts less than 80% of area median family income and tracts 50-100% non-white) for Nassau County. The pattern of home purchase lending in Nassau is similar to that of its total mortgage lending, as seen in Figure 1. There do appear to be few tracts with the least amount of lending (red tracts), and some of the tracts that were red or yellow in the total mortgage lending map are now yellow or green. This suggests that, as a whole, HMDA reporting lenders tend to work harder to reach out to low-moderate income communities and communities of color with respect to home purchase loans than with refinance or home improvement loans.

Overall, these maps suggest that mortgage lending is happening throughout much of Nassau County.

Suffolk County

In 2015, there were 18,961 mortgage loans originated in Suffolk County, an average of 59 loans per census tract. Figure 3 in Appendix C shows the total loan originations of all HMDA reporters

by census tract and neighborhood demographics (tracts less than 80% of area median family income and tracts 50-100% non-white) for Western and Central Suffolk County. As with Nassau County, mortgage lending appears to be generally spread throughout western and central Suffolk County, with tracts of average or above average lending (green and blue) throughout the area. Some areas that are communities of color and low-moderate income areas obtained more loans than average (green areas), including Northampton, Flanders, North Bay Shore and parts of Huntington Station, North Amityville and Bay Shore. Other low-moderate income communities of color, however, had lending levels significantly or somewhat below average (red and yellow), including Brentwood, Central Islip and parts of Riverhead, Gordon Heights, Brookhaven and Bay Shore.

There were 10,252 home purchase originations in Suffolk County in 2015, an average of 32 loans per census tract. Figure 4 in Appendix C shows the home purchase originations of all HMDA reporters by census tract and neighborhood demographics (tracts less than 80% of area median family income and tracts 50-100% non-white) for western and central Suffolk County. The pattern of home purchase lending in this part of Suffolk is similar to that of its total mortgage lending, as seen in Figure 4. The notable exceptions include Northampton and Flanders which are not above average in home purchase lending (yellow), and Bay Shore which is all above average in home purchase lending (green).

Overall, these maps suggest that mortgage lending is happening throughout most of western and central Suffolk County.

Mortgage Loan Products and Initiatives

During Empire Justice's second call with Citi, bank staff shared about the Nationwide Mortgage Collaborative (NMC).³⁴ It is a collaborative of CDFIs headed up by Springboard CDFI and HUD-approved housing counseling agencies. Combining the products of various CDFIs, including their correspondent lending products (i.e. Citi Mortgage), the collaborative via an online platform expands the set of mortgage products available to consumers so they get the product that best fits them. According to a press release Citi shared with Empire Justice,³⁵ Citi Community Development will provide \$1 million to Springboard CDFI will expand its loan origination platform to 13 states during 2018. The expansion will build the capacity of the NMC to deliver responsible mortgage credit access for low- to moderate-income, minority, rural, and other underserved first-time homebuyers.

Citibank also has its own affordable, fixed rate, mortgage product, the HomeRun Mortgage, which can be used for purchase or rate term refinancing. According to information on the bank's website,³⁶ down payments are as low as 3%, of which only 1% has to be from the borrower (the other 2% can be from grants and programs). No mortgage insurance is required, interest rates are

³⁴ <https://www.mortgagecollaborative.org/>.

³⁵ <https://www.businesswire.com/news/home/20180228006216/en/Citi-Community-Development-Springboard-CDFI-Announce-Major>.

³⁶

https://online.citi.com/US/JRS/portal/template.do?ID=mortgage_community_lending_homerun&JFP_TOKEN=7XY47UBP

comparable to conventional loan rates, and there are flexible credit guidelines. The website does not give the exact credit score limits or interest rates.

According to Long Island Housing Partnership (LIHP), although the product is a popular program in the boroughs, its Long Island clients are most likely to use SONYMA which is more compatible with grants. Therefore, clients do not take advantage of HomeRun on Long Island. LIHP clients are almost always first time home buyers, so the SONYMA DPAL, along with the 2% lender credit they receive from Citibank, make it a better option. LIHP presently has 2 commitments using the HomeRun product in 2018.

Conclusion: Citigroup's Mortgage Lending

We are pleased that Citigroup is the 2nd largest mortgage lender among the top banks in Nassau and Suffolk Counties. Still, there is significant room for Citigroup to grow to better serve Long Island and its low-moderate income neighborhoods and people and communities of color:

- Its low mortgage lending volume in all areas examined was not on par with its depository market share;
- Its lower than expected market shares in every category -- low-moderate income households and census tracts, Black and Latino households, and minority census tracts; and
- Its lower than expected distribution of loans to almost every category -- low-moderate income census tracts, Black and Latino households, and minority census tracts.

Citigroup's total loans and home purchase loans market share is only 3% and 4%, respectively, as compared to its 10.56% depository market share. As seen in the lending maps, mortgage lending is happening in many communities across Long Island. There is a clear opportunity here for Citigroup to make more loans among Long Island's low-moderate income neighborhoods and to increase its outreach and lending to communities of color.

CITIGROUP'S SMALL BUSINESS LENDING

As with mortgage lending, we look at a bank's small business lending performance in comparison to its peers in a point in time. We examine Citigroup's lending in relation to its peers, the other top depositories in the Nassau/Suffolk MSA, using the 2016 CRA small business data.

Citigroup's Small Business Lending Compared to Peers

As with the mortgage lending, we compare a bank's small business lending to its peers, the other depositories with the greatest market share in the Nassau/Suffolk MSA. Included in this letter is a table with the number of loans and dollar volume of small business lending for the top 11 banks that reported CRA small business loans in 2016. (See Table 9 in Appendix B.) As seen above in this letter, Citigroup ranked 3rd in deposit market share in the Nassau/Suffolk MSA in 2016 with 10.56% of the market. We use this information when comparing Citigroup's small business lending with its peers.

Number of Loans Market Share

As seen in the above referenced table, in 2016, Citigroup, with 7,159 loans, captured 7.8% percent of the small business lending market, making Citigroup the 3rd among the top 11 banks, and 4th among all lenders, in Nassau/Suffolk in terms of number of small business loans. We are pleased to see that Citigroup's market share in the various categories examined met or exceeded its overall market share in all categories. **Still, while better than its number of mortgage loans market share, we would like to see Citigroup's overall market penetration with respect to number of small business loans get significantly closer to its depository market share of 10.56%.**

Compared to its overall small business loan market share of 7.8% in the Nassau/Suffolk MSA, Citigroup had a market share of:

- 7.9% among businesses in low-moderate income census tracts, making Citigroup 4th among the top 11 banks
- 8.1% in loans of \$100,000 or less, making Citigroup 3rd among the top 11 banks
- 8.3% in loans of \$100,000 or less to businesses in low-moderate income census tracts, putting Citigroup 4th among the top 11 banks
- 13.4% among businesses with gross annual revenues under \$1 million, putting Citigroup 2nd among the top 11 banks
- 13.5% among businesses with gross annual revenues under \$1 million in low-moderate income census tracts, putting Citigroup 2nd among the top 11 banks

Citigroup performed better among businesses with GAR<\$1 million, with a 2nd place ranking among the top 11 banks, but ranked 4th in loans in low-moderate income census tracts and loans <\$100,000 in low-moderate income census tracts. Given that 99% of Citigroup's lending dollars were distributed in loans <\$100,000, we would expect more of those loans to fund businesses in low-moderate income census tracts; only 15% of Citigroup's loans <\$100,000 were to businesses in low-moderate income census tracts.

Dollar Volume Lending Market Share

In 2016, with \$88.24 million in lending, Citigroup captured 3.1% of the dollar volume of small business lending in Nassau/Suffolk, making it the 7th largest dollar volume lender among the top 11 banks, and 9th among all lenders, in the Nassau/Suffolk MSA. (See the bottom half of above referenced table.)

Citigroup's dollar volume lending market share in all categories examined fell far short of its 10.56% depository market share, and its ranking compared to its peers in these categories did not meet its 3rd place ranking in depository market share, except for one category (Citigroup tied for 3rd with TD Bank in its dollar volume of lending to businesses with GAR<\$1 million).

Citigroup's average loan size of \$12,330, the smallest among the top banks, as well as the fact that 99% of its loans were loans <\$100,000, indicates that Citigroup does most of its small

business lending via credit card loans. We are very concerned about this and would like to hear about Citigroup's small business credit card and other small dollar loan products for businesses. We would be happy to have a conversation with Citigroup about how to better serve Long Island businesses, particularly smaller businesses and those located in low-moderate income communities or communities of color.

Except for its dollar volume lending market share in low to moderate income census tracts, Citigroup's share of the dollar volume lending in the various markets was more than its overall small business market share. Compared to its overall small business dollar volume lending market share of 3.1% in the Nassau/Suffolk MSA, Citigroup had a market share of:

- 2.6% among businesses in low-moderate income census tracts, making Citigroup 8th among the top 11 banks
- 4.8% in lending of \$100,000 or less, making Citigroup 4th among the top 11 banks
- 4.5% in lending of \$100,000 or less to businesses in low-moderate income census tracts, putting Citigroup 4th among the top 11 banks
- 5.7% among businesses with gross annual revenues under \$1 million, tying with TD Bank for 3rd among the top 11 banks
- 4.5% among businesses with gross annual revenues under \$1 million in low-moderate income census tracts, putting Citigroup 6th among the top 11 banks

In most categories examined, Citigroup outperformed all financial institutions (AFI) and other financial institutions (OFI) in the distribution of its lending dollars. However, the distribution of Citigroup's resources in low-moderate income census tracts is lacking when compared to AFI and OFI. In 2016, 13.3% of Citigroup's loan dollars went to businesses in low-moderate income census tracts, compared to 16.7% for OFI and 16.1% for AFI. Citigroup also falters in comparison to the average of the Top 11 banks, with 15.7% of dollars from these institutions going to businesses in low-moderate income census tracts, compared to Citigroup's 13.3%.

Conclusion: Citigroup's Small Business Lending

Citigroup's small business lending performance exceeds its mortgage lending performance. While there is still some room for improvement with respect to making more than credit card loans to businesses and loans to businesses in low-moderate income neighborhoods, Citigroup, as well as the other top banks, has been able to penetrate the small business market in a way that works, especially when compared to mortgage lending. This could be the different nature of the two markets.

CITIGROUP'S COMMUNITY DEVELOPMENT ACTIVITIES

Introduction

As stated earlier, Long Island's poverty rate is the highest it has been since 1959. The Long Island Association reported a combined 6.6 percent poverty rate for Nassau and Suffolk counties in 2015, as compared to the 1959 poverty rate of 6.8 percent. The average annual number of Long Islanders living below the federal poverty line increased from 152,462 to 185,415, an

increase of 32,953 or 22% between 2011 and 2015. In a town such as East Hampton, there is a perception of great wealth. However, the Town of East Hampton received more than 4,000 pre-applications for its Section 8 housing voucher waiting list in January, 2018. This is a record number and a ten-fold increase since 2012 when the list was last opened up.³⁷

Therefore, the need for CRA work on Long Island and partnerships with banks that have high depository market shares such as Citigroup is critical. With \$13.1 billion in deposits and 10.56% of the market in 2016, Citibank is the 3rd largest depository on Long Island. Long Island advocates, however, have had limited experience with Citigroup. Not for profits, housing agencies or first time homebuyer organizations report few Citigroup partnerships.

Citi Staff Highlights

Below are some of the community development investments Citi staff highlighted during its calls with Empire Justice.

H&WC Virtual VITA. Citi Community Development is the founding corporate partner of the Health and Welfare Council of Long Island's (HWCLI) **Virtual VITA** program on Long Island. HWCLI had a very successful 2018 Virtual VITA tax filing year with the back office support of the NYC Food Bank. In 2018, HWCLI helped to submit 363 returns yielding \$402,054 for tax filers, \$114,140 of which was via the Earned Income Tax Credit (EITC). In this, the second year of the program, HWCLI implemented new municipal partnerships with the Towns of Babylon, Brookhaven and Riverhead and has raised awareness with support from partners such as Newsday.

During the first call, Empire Justice shared about the Monroe County/Rochester VITA program, C.A.S.H., which is hosted at Empire Justice Center. Compared to the 363 returns prepared by the Citi Long Island Virtual VITA in 2018, C.A.S.H. annually prepares returns for between 10,000-13,000 families. In 2017, the free tax preparation assistance program returned over \$16.9 million in tax refunds, of which \$8.1 million was the EITC, to working families. Clearly, there is a large growth opportunity for Long Island's Virtual VITA program. We urge Citi to increase its financial support to make this happen.

CARECEN Pathways 2 Citizenship Long Island. Citi Community Development is the founding corporate partner of the Pathway to Citizenship Long Island (P2C LI) program, and is also responsible for facilitating the program partnerships currently in place with the NYS Department of Labor for re-credentialing of academic diplomas and Bethpage Federal Credit Union for microloans when an application fee waiver does not apply. Citi's support also incorporates financial counseling into the program model. Since June 2014 through 5/14/2018, the organization has completed 3,214 naturalization applications with 3,127 submitted to U.S. Citizenship and Immigration Services (USCIS). 2,537 fee waivers have been completed and 97% of clients were low- to moderate-income (LMI) individuals.

Empire Justice noted that the organization has recently started doing immigration representation in its Long Island Office at Touro Law School. Immigrants have a variety of needs, including

³⁷ <https://www.newsday.com/long-island/suffolk/east-hampton-affordable-housing-1.17128828>

affordable mortgage loans, affordable rental housing and housing rights education when their immigration status is in jeopardy. We urge Citi to expand its support of immigrant work to these other areas, in addition to the work it already does around financial counseling. During the second call, Citi offered to connect the new immigration attorney with P2C LI to share resources.

Long Island Housing Partnership CLT. The Long Island Housing Partnership Community Land Trust (LIHP CLT), is the first regional Community Land Trust (CLT) covering all of Long Island, both Nassau and Suffolk Counties, with the mission to provide new and innovative homeownership opportunities to low- and moderate-income families. Citi Community Development is the founding corporate partner, helping to accelerate the development of 127 Sandy-damaged scattered site properties in the CLT pipeline by ensuring that the CLT has the resources to capitalize on all potential development opportunities, while addressing obstacles as they arise in closing deals. Citi's support provides funds for traditional predevelopment expenses (survey, environmental, legal, etc.), development expenses (hard costs), financing and subsidy gaps/shortfalls and the time of dedicated, skilled staff that are capable of navigating multi-stakeholder development deals. Citi anticipates that the first properties will be placed in the CLT in Q2 2018 with homeowners purchasing CLT homes by end of 2018. LIHP is also working with Grounded Solutions, which is providing technical assistance on ground leases, outreach and marketing.

The Long Island Equity Agenda (Urban League of Long Island/Policy Link/Long Island Community Foundation). Policy Link has worked with the Urban League of Long Island to advance the work of the Long Island Equity Council, which was formed after the release of a profile, [An Equity Profile of Long Island](#), and accompanying policy brief, [Empowering Black Long Island](#), in April 2017.³⁸ This report was produced by Policy Link and PERE, with lead support from Citi Community Development and funding from Long Island Community Foundation and The Robert Wood Johnson Foundation.

The goal of this racial equity body of work is intended to close the racial wealth gap among Black residents by providing equitable employment opportunities as well as greater access to education, financial services, healthcare, housing, transportation that can transform lives and enable Black Long Islanders to participate more broadly in the economy. The [Policy Link Long Island data profile](#) found that closing the racial wealth gap in 2014 would have led to a \$24 billion boost to the local economy. This engagement has been particularly important as the challenges local leaders on Long Island face, and the solutions they are testing, is helping everyone better understand and address economic security for African-Americans in a suburban context. The Long Island Equity Council has met monthly to build up its voice, messaging, and an action plan to move forward a racial equity agenda that could transform the lives of Black Long Islanders. Policy Link and the Urban League has facilitated the development of a results-based framework – a strategic approach to using data to drive outcomes – for the council that will serve as a road map to move the work forward and achieve long-term results for the community.

³⁸ These can be found at: <http://www.policylink.org/resources-tools/empowering-black-long-island> and <http://www.policylink.org/resources-tools/long-island-equity-profile>.

In the first call with Empire Justice, Citi staff noted that they are now working locally to develop sets of recommendations and action items for each community. The bank is also asking the Federal Reserve Bank of NY to conduct a more localized community credit needs study on Long Island, which can be paired with the Policy Link reports to inform the recommendations and action items. We are glad to see this and hope that Citi will reach out to some of the signatories in this letter to participate in designing the recommendations.

Small Business Succession Plans. Empire Justice heard on the first call that Citi is considering financing small business succession plans like worker collaboratives, ESOPs and worker-owned cooperatives, so that small businesses stay in local communities and provide job stability for workers. We urge Citi to provide substantial financial support to initiatives like these.

Support of Home-Based Child Care. Citi supports an SBDC of Farmingdale facilitated 8-week workshop series for home-based child care providers. The workshops cover, among other things, writing a business plan, accounting, legal structure and marketing of your business, and certification with the Child Care Council. Citi is the sole funder outside the SBDC of these series of workshops.

Expanding Access to ATMs for Minority Depository Institutions (MDIs), Community Banks and Credit Unions. Since mid-2016 Citibank has been piloting with a total of 23 participating MDIs, community banks and credit unions to offer their customers, with no out-of-network fees, the use of Citi's 2400 branch ATMs. The Citi ATM Community Network continues as a pilot in 2018.³⁹ We applaud Citi for this simple, yet innovative, way to expand consumer access to affordable ATMs, and urge the bank to significantly expand the project within its footprint, particularly to community development credit unions and MDIs.

Long Island Advocates' Highlights

Empire Justice Center reached out to local consumer advocates to describe both community credit needs and their own experiences with Citigroup. Those responses are summarized below.

Mortgage Servicing and Foreclosure Prevention. As Anchor Partner to the New York State Office of the Attorney General's (OAG) Homeownership Protection Program (HOPP), Empire Justice Center oversees grants made to over 90 agencies throughout New York State (but not including New York City) that provide housing counseling and legal services, free of charge.

Empire Justice has found over the 15 years it has done foreclosure prevention work that the most effective way to resolve foreclosures and delinquencies is through a local single point of contact which organizations can reach to address and escalate issues.

Economic Opportunity Council (EOC) of Suffolk, Inc. The most difficult step for low to moderate income first time homebuyers is the gathering of funds for down payment and closing costs. The cost of homes and their associated real estate taxes are expensive in the Long Island housing market. Likewise, rents are high, making it very difficult for the low to moderate income individual/family to save at all.

³⁹ <https://www.occ.gov/publications/publications-by-type/other-publications-reports/cdi-newsletter/minority-depository-may-2018/article-4-citibank.html>

As a HUD approved housing counseling agency, it is the responsibility of EOC to not only provide housing counseling services to the low to moderate income first time homebuyers, but also provide them with information on local down payment assistance programs, such as Suffolk County Down Payment Assistance Program, HOME funds and First Home Club funds, and affordable mortgage products such as SONYMA Mortgage with closing costs assistance (CCAL). Their ability to access these programs greatly increases their chances of becoming a first time homebuyer.

EOC has worked with Citi in the past and is looking forward to continuing that working relationship. EOC would appreciate Citi's support for its vast array of our programs.

CDC of Long Island. CDC reports that Citi Community Development and Citi Foundation have been very supportive of CDCLI's programs over many years. In addition to providing funding in support of CDC's homeownership and foreclosure prevention programs, Citi has also assisted CDC's community revitalization efforts in the Village of Hempstead, and their community development financial institution affiliate. Citi's lending team meets with CDC on an annual basis to discuss affordable mortgage products, and their Community Relations Director serves on CDC's Council of Advisors. Lastly, Citi has provided permanent financing on some of the multifamily developments with private partners that CDC has.

Long Island Housing Partnership (LIHP). LIHP states that Citibank has and continues to be an excellent lending partner. Its programs meet the needs of the LIHP's LMI homebuyers through the SONYMA and Home Run products; which includes their down payment assistance. Citi's staff is very knowledgeable regarding their lending products, have excellent communication skills, and are very responsive. Citi Community Development is a valued partner in the LIHP's Community Land Trust Initiative,⁴⁰ providing funding to rebuild homes damaged by Super Storm Sandy. These homeowners will be at 80% AMI. Citi staff worked with SONYMA and LIHP on the Spruce Up Brentwood Program where homes in the LMI community of Brentwood were given a spruce up in Fall 2017.

La Fuerza Unida. La Fuerza Unida's (LFU) experience with Citigroup has been limited. LFU indicates that Citigroup is virtually a non-existent bank; it looks down on small businesses and low to middle class depositors. Citi has not shared information with LFU about its mortgages products, business loans, lines of credit or its hospitality to customers. La Fuerza was denied a couple of applications, which prompted the organization to close an account held at the bank some time ago. On the foreclosure front, for homeowners with mortgages from Citibank who have been in jeopardy of foreclosure, LFU has been highly disappointed when approaching Citibank. It has not heard of any client interested in going to Citigroup for any business.

Nassau Suffolk Law Services. Nassau/Suffolk Law Services represents low-income individuals and families facing eviction. The number of eviction proceedings filed on Long Island each year is relatively consistent. Nassau County sees somewhere between 8,000 and 9,000 eviction proceedings annually, while Suffolk County sees around 15,000. A majority of these cases are likely due to the failure to pay rent. The current fair market rents (FMR) for Long Island, as set

⁴⁰ <https://shelterforce.org/2018/04/27/new-program-aims-to-help-community-land-trusts-get-to-scale/>

by HUD, are \$1,230 for efficiency (studio) units, \$1,553 for one bedroom units, \$1,878 for two bedrooms, \$2,429 for three bedrooms, and \$2,717 for four bedroom units.

Minimum wage employees who engage in a 40 hour work week receive \$1,892 per month in gross income. The FMR for an efficiency unit would require approximately 67% (two-thirds) of that person's monthly gross income, exclusive of other basic needs such as utilities (often not included in the rent charge), food, transportation, clothing and hygiene. The monthly earnings of a worker receiving minimum wage is essentially equivalent to the cost of a two bedroom unit. Supplemental Security Income recipients receive a maximum monthly benefit of \$822. The majority of Social Security recipients are unlikely to receive more than \$2,000 per month and quite often receive far less. Low-income wage earners, the elderly and disabled are simply deprived of decent, affordable housing opportunities on Long Island.

It is essential to increase the affordable rental housing opportunities on Long Island to meet the needs of all income groups, but most especially for low-income households whose choice tends to be between substandard, overcrowded options and homelessness. Banks can, must, meet their obligations under the CRA by aggressively offering investments and community development loans to strongly encourage development of affordable housing for the lowest income households. The idea of homeownership is no longer the ideal for all on Long Island. It is critical for banks with high depository market shares, like Citigroup, to meet their CRA obligations by investing in affordable rental housing.

Central Islip Civic Council. The Central Islip Civic Council (CICC) has been in the community for over 50 years. The organization offers to the community in Central Islip first-time home buying events in which the local financial institutions are invited to participate.

CICC would like to see products offered for first time homebuyers as well as affordable checking and savings products. The Central Islip community has a large Hispanic population and CICC would like to see that Citigroup makes certain that there are bi-lingual representatives in the local branches.

Citigroup used to be one of the biggest supporters of CICC's housing initiatives; especially of its Foreclosure Intervention program. Up until June 2015, Citigroup Foundation was giving the CICC \$50,000 a year, and CRA was giving \$5,000 a year. CICC was told that Citigroup needed to cut some of its funding to some organizations out on Long Island and unfortunately CICC was one of those organizations. CICC went from getting \$50,000 a year in support for its Foreclosure Intervention program to no funding. At that time CICC, had used Citigroup as its main financial banking institution. When Citi Foundation and CRA support to the organization was cut, CICC moved its 8 bank accounts to another institution.

Long Island Housing Services. Long Island Housing Services recommends that Citigroup adopt fair lending best practices, including in the areas of advertising (diverse human models, direct marketing to underserved, under-banked, and unbanked); serving consumers with limited English proficiency (community hiring, language line, preferred language identification posters,⁴¹ and Title VI compliance); fair lending training (all public-facing personal trained and

⁴¹ See an example at: https://www.languageline.com/hubfs/Support_Materials/Poster.png

scripted referrals); lending products (alternative credit scoring models, micro-lending and payday lending alternatives, redlined and reverse redlined area subsidy fund, and HUD approved housing counseling); location (low opportunity area siting; match community needs, loan officer availability in community, and physical accessibility); and compliance (single compliance officer for all fair lending, experienced self-testing agency reports, and public reporting of fair lending activities).

SafeGuard Credit Counseling Services, Inc. SafeGuard has experienced a very positive and mutually beneficial business relationship with Citibank, over the past 10 plus years, and has been supported by Citibank in connection with our credit counseling outreach, education, and related services to consumers. In this regard, SafeGuard is very similar to the majority of the 501c3 non-profit credit counseling industry and has experienced levels of support from Citibank, which is typically commensurate with the size of the respective organization as well as the Debt Management Plan services and payments they have provided.

Over the past 2 years, SafeGuard as has received approximately \$146,000 of funding from Citibank, in support of its Debt Management Plan payments. These payments totaled approximately \$4,000,000, which has been sent by SafeGuard to Citibank on behalf of mutual clients.

SUNY Farmingdale Small Business Development Center. The Small Business Development Center (SBDC) is part of a network of 24 regional centers across NY State that works with individuals looking to start or to expand their businesses. Through direct counseling, the SBDC provides its clients with a range of management and technical assistance services. These include: business plan development, financial planning, export assistance, personnel and ownership succession, cost analysis, marketing, strategic planning, disaster assistance and planning, veteran and MWBE certification and procurement assistance and loan information assistance.

The Farmingdale SBDC has been working with the small business community since 1985. To date the center has worked with over 31,500 businesses, helping them invest \$430,883,486 in the area's economy, and create or save 17,983 jobs.

The SBDC monitors the activity reported out by the SBA on their lending activity reports and has noticed that Citibank is listed with activity each month. There are other area lenders with more activity in the lending to the small business community but the SBDC at Farmingdale has been told by some of its clients they have been successful with getting lines of credit through Citi.

Citi is also very committed to small business program funding through their foundation to meet their CRA requirement. They have given to the SBDC over the years for programs targeting small businesses and asset building. The person involved in making grants has made herself known and is visible in this space.

CONCLUSION

As one of the largest depositories in the Long Island MSA, Citigroup should be a leader in meeting the unmet credit needs of the Long Island community, with special focus on the LMI and majority non-white neighborhoods in the area. We urge the OCC to take the following into consideration as it evaluates Citibank's CRA performance:

- Despite being the third largest depository in the Long Island NY MSA with 10.56% of the market, Citigroup captures only 3% of the total mortgage lending market and 4% of the home purchase lending market.
- The lack of affordable mortgage products, or awareness of them (if they exist), that fit the needs of homebuyers working with not for profits and getting grants for down payments, closing costs or repairs.
- The bank's penetration of the CRA small business lending market mainly via small business credit card lending, and room for improvement with respect to loans to businesses in low-moderate income neighborhoods.
- The bank's retail products that help lower income customers build and keep their wealth, including its Access check-less checking account that has low fees, its adherence to Pew's best practices and limits on over-draft fees, and its secured credit card to help build or repair credit.

We would be happy to work with Citigroup to continue discussing community credit needs and innovative programs that would benefit both the bank and the low-moderate income population of Long Island. To facilitate this engagement, we will be sharing a copy of this letter with Citi staff; and we will review the bank's response and incorporate it into a follow-up letter to the OCC.

In the meantime, the CRA evaluation should accurately reflect how the bank has been serving our communities, particularly low and moderate income families and communities.

If you have any questions, please contact Maria DeGennaro (mdegennaro@empirejustice.org, 630-650-2319) or Barbara Van Kerkhove (bvankerkhove@empirejustice.org, 585-295-5815) of Empire Justice Center.

Sincerely,

Empire Justice Center
Central Islip Civic Council
Economic Opportunity Council of Suffolk, Inc.
La Fuerza Unida, Inc.
Long Island Housing Services, Inc.
SafeGuard Credit Counseling Services, Inc.
SUNY Farmingdale Small Business Development Center

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Appendix A: Organizational Summaries

Signatories to This Letter

Empire Justice Center is a statewide, multi-issue, multi-strategy public interest law firm with offices in Albany, Rochester, White Plains, Yonkers and Central Islip (Long Island). Empire Justice focuses on changing the “systems” within which poor and low income families live. With a focus on poverty law, Empire Justice undertakes research and training, acts as an informational clearinghouse, and provides litigation backup to local legal services programs and community based organizations. As an advocacy organization, we engage in legislative and administrative advocacy on behalf of those impacted by poverty and discrimination. As a non-profit law firm, we provide legal assistance to those in need and undertake impact litigation in order to protect and defend the rights of disenfranchised New Yorkers. www.empirejustice.org

Central Islip Civic Council, a non-profit, community based agency dedicated to improving the quality of life for all residents of Central Islip for the past 50 years. For more information, visit <http://www.centralislipciviccouncil.org/>.

Economic Opportunity Council of Suffolk, Inc. (EOC) is a not-for-profit 501(c) (3) and HUD approved housing counseling agency. 2017 will mark EOC's 50th year of service in helping communities and individuals throughout Suffolk County sustain economic security and achieve self-sufficiency. For more information, visit www.eoc-suffolk.

La Fuerza Unida, Inc.: Our mission is to enhance the social, literary educational cultural and economic conditions of the Hispanic-American and the low and moderate income community at large. For more information, visit www.lfuinc.org.

Long Island Housing Services, Inc. is a private, non-profit HUD-qualified Fair Housing Enforcement Organization and a federally approved Housing Counseling Agency whose mission is the elimination of unlawful housing discrimination and promotion of decent and affordable housing through advocacy and education. For More information visit: www.lifairhousing.org.

SafeGuard Credit Counseling Services, Inc., a 501c (3) not for profit organization, has a mission to assist consumers in meeting and satisfying their fiscal responsibilities and reaching their financial goals through our ethical and highly successful financial literacy education, credit, bankruptcy and housing counseling programs. For more information, visit: www.safeguardcredit.org.

SUNY Farmingdale Small Business Development Center (FSBDC) is located on the campus of Farmingdale State College on Long Island. It provides low-cost workshops and free one-on-one technical and management assistance to start-up and existing small businesses. Services range from answering startup and business structure questions to assisting with business plans, cash flow projections, marketing plans, and loan information. It is administered by the State University of New York and funded in part by the U. S. Small Business Administration and the State of New York. The FSBDC works mainly with women-owned and minority-owned business

enterprises. Last year, 37% of its clients were minority or non-white-owned businesses and 48% were women-owned businesses or women-women partnerships.

Other Organizations:

Nassau Suffolk Law Services has been assisting Long Islanders since 1966. They were the first Legal Services Corporation program in New York State and is one of the largest in New York State. The firm handles over 6,000 cases a year with a total staff of 83, comprised of attorneys, paralegals, social workers and support staff. The program is dedicated to providing equal access to basic human rights and services through provision of high quality legal representation, public information and community advocacy training to ensure that low income, disabled and disadvantaged individuals have equal access to the civil justice system on Long Island. This includes foreclosure prevention and tenant representation in landlord tenant court.

Appendix B: Tables

Table 1: Offices and Deposits of all FDIC-Insured Institutions Nassau & Suffolk Counties, NY										
Offices and Deposits of all FDIC-Insured Institutions										
Deposit Market Share Report										
Deposits as of: June 30, 2016										
	Institution Name	CERT	State (Hqtrd)	Bank Class	State/ Federal Charter	Outside of Market		Inside of Market		
						No. of Offices	Deposits \$000	No. of Offices	Deposits \$000	Market Share
Rank										
1	JPMorgan Chase Bank, National Association	628	OH	N	Federal	5232	1,129,245,936	181	25,939,082	20.90%
2	Capital One, National Association	4297	VA	N	Federal	717	190,720,490	93	17,070,608	13.76%
3	Citibank, National Association	7213	SD	N	Federal	690	479,964,000	66	13,110,000	10.56%
4	Bank of America, National Association	3510	NC	N	Federal	4680	1195850339	73	8,635,169	6.96%
5	TD Bank, National Association	18409	DE	N	Federal	1225	205881913	62	8,604,548	6.93%
6	New York Community Bank	16022	NY	SB	State	188	20,225,517	50	6,419,633	5.17%
7	HSBC Bank USA, National Association	57890	VA	N	Federal	191	129,987,551	38	6,089,361	4.91%
8	Astoria Bank	29805	NY	SB	Federal	34	3,775,003	54	5,371,810	4.33%
9	Signature Bank	57053	NY	NM	State	23	25231906	7	4,348,527	3.50%
10	Apple Bank for Savings	16068	NY	SB	State	59	8013483	21	3,702,473	2.98%
11	The Bridgehampton National Bank	6976	NY	N	Federal	2	110416	38	2,743,972	2.21%
12	The First National Bank of Long Island	7072	NY	N	Federal	4	187,068	40	2,438,161	1.96%
13	Flushing Bank	58564	NY	NM	State	16	1,534,318	4	2,410,632	1.94%
14	Wells Fargo Bank, National Association	3511	SD	N	Federal	6199	1143137795	15	2,199,205	1.77%
15	The Suffolk County National Bank of Riverhead	7278	NY	N	Federal	1	5,305	26	1,945,456	1.57%
16	People's United Bank, National Association	27334	CT	N	Federal	335	27291610	56	1,814,402	1.46%
17	BankUnited, National Association	58979	FL	N	Federal	100	16,993,287	1	1,398,910	1.13%
18	Manufacturers and Traders Trust Company	588	NY	SM	State	819	94,139,926	20	1,361,011	1.10%
19	New York Commercial Bank	32749	NY	NM	State	20	1,187,436	11	1,312,115	1.06%
20	Valley National Bank	9396	NJ	N	Federal	208	15,244,998	12	1,144,862	0.92%
21	Ridgewood Savings Bank	16026	NY	SB	State	28	2,958,031	8	1,138,674	0.92%
22	The Dime Svgs. Bank of Williamsburgh	16012	NY	SB	State	18	2,857,001	7	1,071,162	0.86%
23	Empire National Bank	58632	NY	N	Federal	0	0	4	649,225	0.52%
24	Sterling National Bank	30337	NY	N	Federal	39	9,256,869	2	580,864	0.47%
25	Santander Bank, N.A.	29950	DE	N	Federal	669	57,625,078	5	575,385	0.46%
26	Investors Bank	28892	NJ	SB	State	141	14,384,794	6	450,613	0.36%
27	Gold Coast Bank	58654	NY	NM	State	0	0	6	354,148	0.29%
28	Esquire Bank, National Association	58140	NY	N	Federal	0	0	1	341,973	0.28%
29	Hanover Community Bank	58675	NY	NM	State	0	0	1	264,717	0.21%
30	American Community Bank	35033	NY	NM	State	0	0	4	144,111	0.12%
31	First Central Savings Bank	34969	NY	SB	State	8	342,038	2	130,144	0.10%
32	Habib American Bank	25093	NY	NM	State	6	678,835	1	127,455	0.10%
33	Maspeth Federal Savings and Loan Association	30303	NY	SB	Federal	5	1,066,530	1	99,370	0.08%
34	BBCN Bank	26610	CA	NM	State	51	6,595,221	1	54,045	0.04%
35	Metropolitan Commercial Bank	34699	NY	SM	State	6	930,283	1	28,129	0.02%
36	Indus American Bank	57983	NJ	NM	State	4	178,492	1	21,462	0.02%
37	Beal Bank, SSB	32574	TX	SB	State	18	1,363,612	1	171	0.00%
38	BNY Mellon, National Association	7946	PA	N	Federal	38	19,596,478	1	0	0.00%
39	First Republic Bank	59017	CA	NM	State	71	51,161,243	1	0	0.00%
	Number of Institutions in the Market: 39				TOTALS	21845	4,857,722,802	922	124,091,585	100.00%

Table 2: Top Banks Total Mortgage Originations 2016

Nassau and Suffolk Counties, NY

(1st lien loans on owner-occupied, 1-4 family, site built units)

# Loans	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	TD Bk	Top 10	OFI
MSA	42,208	271	858	21	587	1,299	67	183	2,310	233	401	6,230	35,978
Black/Hispanic HH MSA	6,729	27	83	1	67	154	2	25	213	20	37	629	6,100
Low-Mod HH MSA	9,978	101	144	1	207	308	2	76	540	35	64	1,478	8,500
Low-Mod Income CT	5,836	36	92	2	93	130	6	28	239	9	42	677	5,159
Minority CT	5,179	16	74	0	51	128	5	23	209	7	28	541	4,638

MARKETSHARE

	Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	TD Bk	Top 10	OFI
MSA	1%	2%	0%	1%	3%	0%	0%	5%	1%	1%	15%	85%
Black/Hispanic HH MSA	0%	1%	0%	1%	2%	0%	0%	3%	0%	1%	9%	91%
Low-Mod HH MSA	1%	1%	0%	2%	3%	0%	1%	5%	0%	1%	15%	85%
Low-Mod Income CT	1%	2%	0%	2%	2%	0%	0%	4%	0%	1%	12%	88%
Minority CT	0%	1%	0%	1%	2%	0%	0%	4%	0%	1%	10%	90%

Loans as %

of MSA TOTAL IN:	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	TD Bk	Top 10	OFI
Black/Hispanic HH MSA	16%	10%	10%	5%	11%	12%	3%	14%	9%	9%	9%	10%	17%
Low-Mod HH MSA	24%	37%	17%	5%	35%	24%	3%	42%	23%	15%	16%	24%	24%
Low-Mod Income CT	14%	13%	11%	10%	16%	10%	9%	15%	10%	4%	10%	11%	14%
Minority CT	12%	6%	9%	0%	9%	10%	7%	13%	9%	3%	7%	9%	13%

Note: Two of the top 12 banks are not included here. Apple Bank for Savings made 0 loans in 2016 and Signature Bank made 1 loan.

Prepared by: Empire Justice Center, 585-454-4060

Table 3: Top Banks Total Mortgage Originations 2015**Nassau and Suffolk Counties, NY**

(All 1st lien home purchase, home improvement and refinance loan originations on owner-occupied, 1-4 family, site built units)

# Loans	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	TD Bk	Wells Fargo	Top 10	OFI
MSA	36,727	255	698	16	464	1,261	164	2,060	189	341	2,924	8,372	28,355
Black/Hispanic HH MSA	5,380	33	81	0	55	142	6	162	9	22	290	800	4,580
Low-Mod HH MSA	9,864	98	151	2	197	314	49	484	36	77	609	2,017	7,847
Low-Mod Income CT	4,931	36	80	3	65	135	12	171	21	39	299	861	4,070
Minority CT	4,337	23	67	1	40	112	12	154	14	20	220	663	3,674
MARKETSHARE													
		Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	TD Bk	Wells Fargo	Top 10	OFI
MSA		0.7%	2%	0%	1%	3%	0%	6%	1%	1%	8%	23%	77%
Black/Hispanic HH MSA		0.6%	2%	0%	1%	3%	0%	3%	0%	0%	5%	15%	85%
Low-Mod HH MSA		1.0%	2%	0%	2%	3%	0%	5%	0%	1%	6%	20%	80%
Low-Mod Income CT		0.7%	2%	0%	1%	3%	0%	3%	0%	1%	6%	17%	83%
Minority CT		0.5%	2%	0%	1%	3%	0%	4%	0%	0%	5%	15%	85%
Loans as %													
of MSA TOTAL IN:	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	TD Bk	Wells Fargo	Top 10	OFI
Black/Hispanic HH MSA	15%	13%	12%	0%	12%	11%	4%	8%	5%	6%	10%	10%	16%
Low-Mod HH MSA	27%	38%	22%	13%	42%	25%	30%	23%	19%	23%	21%	24%	28%
Low-Mod Income CT	13%	14%	11%	19%	14%	11%	7%	8%	11%	11%	10%	10%	14%
Minority CT	12%	9%	10%	6%	9%	9%	7%	7%	7%	6%	8%	8%	13%
AFI: All Financial Institutions													
OFI: Other Financial Institutions													
Notes: Two of the top 12 banks are not included here. Apple Bank for Savings made 0 loans in 2015 and Signature Bank made 2 loans.													
Prepared by: Empire Justice Center, 585-454-4060													

Table 4: Top Banks Dollar Amount HMDA Lending 2016
Nassau and Suffolk Counties, NY

Aggregate Amount of Loans (000's) (1st lien loans on owner-occupied, 1-4 family, site built units)

Dollar volume of loans	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	TD Bk	Top 10	OFI
MSA	15,131,095	80,714	381,820	11,043	168,895	533,133	31,486	57,255	965,582	80,325	205,063	2,515,316	12,615,779
Black/Hispanic HH MSA	2,072,323	6,672	24,185	288	17,413	43,005	645	5,523	64,653	6,980	14,189	183,553	1,888,770
Low-Mod HH MSA	2,264,667	18,425	28,838	22	34,840	57,880	367	13,009	108,641	8,558	13,541	284,121	1,980,546
Low-Mod Income CT	1,531,179	6,693	24,749	339	19,971	30,535	1,921	5,983	62,452	2,267	14,024	168,934	1,362,245
Minority CT	1,444,442	4,041	17,378	0	11,462	31,534	1,491	4,577	55,101	2,003	7,491	135,078	1,309,364
MARKETSHARE													
		Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	TD Bk	Top 10	OFI
MSA		1%	3%	0%	1%	4%	0%	0%	6%	1%	1%	17%	83%
Black/Hispanic HH MSA		0%	1%	0%	1%	2%	0%	0%	3%	0%	1%	9%	91%
Low-Mod HH MSA		1%	1%	0%	2%	3%	0%	1%	5%	0%	1%	13%	87%
Low-Mod Income CT		0%	2%	0%	1%	2%	0%	0%	4%	0%	1%	11%	89%
Minority CT		0%	1%	0%	1%	2%	0%	0%	4%	0%	1%	9%	91%
Loans as %													
of MSA TOTAL IN:	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	TD Bk	Top 10	OFI
Black/Hispanic HH MSA	14%	8%	6%	3%	10%	8%	2%	10%	7%	9%	7%	7%	15%
Low-Mod HH MSA	15%	23%	8%	0%	21%	11%	1%	23%	11%	11%	7%	11%	16%
Low-Mod Income CT	10%	8%	6%	3%	12%	6%	6%	10%	6%	3%	7%	7%	11%
Minority CT	10%	5%	5%	0%	7%	6%	5%	8%	6%	2%	4%	5%	10%

Note: Two of the top 12 banks are not included here. Apple Bank for Savings made 0 loans in 2016 and Signature Bank made 1 loan.

Prepared by: Empire Justice Center, 585-454-4060

Table 5: Top Banks Aggregate Dollar Volume Lending, 2015
Nassau and Suffolk Counties, NY

Aggregate Amount of Loans (000's) (For all 1st lien loan originations on owner-occupied, 1-4 family, site built units)

Dollar volume of loans	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	TD Bk	Wells Fargo	Top 10	OFI
MSA	\$ 12,925,294	\$ 74,665	\$ 293,419	\$ 9,167	\$ 125,063	\$ 549,651	\$ 64,541	\$ 874,697	\$ 68,111	\$ 159,773	\$ 1,172,856	\$ 3,391,943	\$ 9,533,351
Black/Hispanic HH MSA	\$ 1,593,962	\$ 8,508	\$ 21,865	\$ -	\$ 13,516	\$ 36,215	\$ 1,593	\$ 50,629	\$ 2,877	\$ 7,136	\$ 88,869	\$ 231,208	\$ 1,362,754
Low-Mod HH MSA	\$ 2,211,679	\$ 17,518	\$ 28,344	\$ 372	\$ 33,854	\$ 60,794	\$ 8,914	\$ 99,905	\$ 8,567	\$ 15,582	\$ 119,478	\$ 393,328	\$ 1,818,351
Low-Mod Income CT	\$ 1,261,644	\$ 6,743	\$ 20,895	\$ 1,807	\$ 10,876	\$ 32,205	\$ 2,430	\$ 42,859	\$ 5,144	\$ 12,417	\$ 72,788	\$ 208,164	\$ 1,053,480
Minority CT	\$ 1,152,774	\$ 5,111	\$ 15,429	\$ 232	\$ 8,448	\$ 25,624	\$ 2,179	\$ 39,803	\$ 3,967	\$ 4,392	\$ 57,510	\$ 162,695	\$ 990,079
MARKETSHARE													
		Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	TD Bk	Wells Fargo	Top 10	OFI
MSA		1%	2%	0%	1%	4%	0%	7%	1%	1%	9%	26%	74%
Black/Hispanic HH MSA		1%	1%	0%	1%	2%	0%	3%	0%	0%	6%	15%	85%
Low-Mod HH MSA		1%	1%	0%	2%	3%	0%	5%	0%	1%	5%	18%	82%
Low-Mod Income CT		1%	2%	0%	1%	3%	0%	3%	0%	1%	6%	16%	84%
Minority CT		0%	1%	0%	1%	2%	0%	3%	0%	0%	5%	14%	86%
Loans as %													
of MSA TOTAL IN:	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	TD Bk	Wells Fargo	Top 10	OFI
Black/Hispanic HH MSA	12%	11%	7%	0%	11%	7%	2%	6%	4%	4%	8%	7%	14%
Low-Mod HH MSA	17%	23%	10%	4%	27%	11%	14%	11%	13%	10%	10%	12%	19%
Low-Mod Income CT	10%	9%	7%	20%	9%	6%	4%	5%	8%	8%	6%	6%	11%
Minority CT	9%	7%	5%	3%	7%	5%	3%	5%	6%	3%	5%	5%	10%
AFI: All Financial Institutions													
OFI: Other Financial Institutions													
Notes: Two of the top 12 banks are not included here. Apple Bank for Savings made 0 loans in 2015 and Signature Bank made 2 loans.													
Prepared by: Empire Justice Center, 585-454-4060													

Table 6: Top Banks Home Purchase Originations 2016**Nassau and Suffolk Counties, NY**

(1st lien home purchase loans on owner-occupied, 1-4 family, site built units)

# Loans	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	TD Bk	Top 10	OFI
MSA	23,681	156	511	5	312	928	38	91	1,572	134	217	3,964	19,717
Black/Hispanic HH MSA	4,523	22	51	1	36	114	1	18	138	11	24	416	4,107
Low-Mod HH MSA	6,322	62	68	0	106	202	0	39	328	25	45	875	5,447
Low-Mod Income CT	3,626	27	57	0	54	99	5	14	167	3	29	455	3,171
Minority CT	3,111	12	33	0	23	85	3	8	141	2	18	325	2,786
MARKETSHARE													
		Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	TD Bk	Top 10	OFI
MSA		1%	2%	0%	1%	4%	0%	0%	7%	1%	1%	17%	83%
Black/Hispanic HH MSA		0%	1%	0%	1%	3%	0%	0%	3%	0%	1%	9%	91%
Low-Mod HH MSA		1%	1%	0%	2%	3%	0%	1%	5%	0%	1%	14%	86%
Low-Mod Income CT		1%	2%	0%	1%	3%	0%	0%	5%	0%	1%	13%	87%
Minority CT		0%	1%	0%	1%	3%	0%	0%	5%	0%	1%	10%	90%
Loans as %													
of MSA TOTAL IN:	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	TD Bk	Top 10	OFI
Black/Hispanic HH MSA	19%	14%	10%	20%	12%	12%	3%	20%	9%	8%	11%	10%	21%
Low-Mod HH MSA	27%	40%	13%	0%	34%	22%	0%	43%	21%	19%	21%	22%	28%
Low-Mod Income CT	15%	17%	11%	0%	17%	11%	13%	15%	11%	2%	13%	11%	16%
Minority CT	13%	8%	6%	0%	7%	9%	8%	9%	9%	1%	8%	8%	14%

Note: Two of the top 12 banks are not included here. Apple Bank for Savings made 0 home purchase loans in 2016 and Signature Bank made 1 loan.

Prepared by: Empire Justice Center, 585-454-4060

Table 7: Top Banks Home Purchase Originations 2015
Nassau and Suffolk Counties, NY

(1st lien home purchase loan originations on owner-occupied, 1-4 family, site built units)

# Loans	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	TD Bk	Wells Fargo	Top 10	OFI
MSA	20,203	158	407	9	266	996	84	1,419	103	189	2,165	5,796	14,407
Black/Hispanic HH MSA	3,475	25	45	0	37	109	4	107	4	14	207	552	2,923
Low-Mod HH MSA	6,020	62	71	2	110	232	18	306	21	47	423	1,292	4,728
Low-Mod Income CT	2,924	25	48	2	39	108	7	110	11	25	220	595	2,329
Minority CT	2,502	18	33	1	23	77	8	105	6	13	146	430	2,072
MARKETSHARE													
		Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	TD Bk	Wells Fargo	Top 10	OFI
MSA		0.8%	2%	0%	1%	5%	0%	7%	1%	1%	11%	29%	71%
Black/Hispanic HH MSA		0.7%	1%	0%	1%	3%	0%	3%	0%	0%	6%	16%	84%
Low-Mod HH MSA		1.0%	1%	0%	2%	4%	0%	5%	0%	1%	7%	21%	79%
Low-Mod Income CT		0.9%	2%	0%	1%	4%	0%	4%	0%	1%	8%	20%	80%
Minority CT		0.7%	1%	0%	1%	3%	0%	4%	0%	1%	6%	17%	83%
Loans as %													
of MSA TOTAL IN:	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	TD Bk	Wells Fargo	Top 10	OFI
Black/Hispanic HH MSA	17%	16%	11%	0%	14%	11%	5%	8%	4%	7%	10%	10%	20%
Low-Mod HH MSA	30%	39%	17%	22%	41%	23%	21%	22%	20%	25%	20%	22%	33%
Low-Mod Income CT	14%	16%	12%	22%	15%	11%	8%	8%	11%	13%	10%	10%	16%
Minority CT	12%	11%	8%	11%	9%	8%	10%	7%	6%	7%	7%	7%	14%
AFI: All Financial Institutions													
OFI: Other Financial Institutions													
Notes: Two of the top 12 banks are not included here. Apple Bank for Savings and Signature Bank made 0 home purchase loans in 2015.													
Prepared by: Empire Justice Center, 585-454-4060													

Table 8: Home Purchase Loan Disposition by Top 20 Home Purchase Lenders, 2015

Nassau-Suffolk Counties NY MSA

(For 1st lien home purchase loans on owner-occupied 1-4 family site built homes)

Rank	RespID	RespName	Applications	Denial Rates	Originations	Marketshare	Additive Marketshare
1	0000451965-9	WELLS FARGO BK NA	2970	14.2%	2165	10.7%	10.7%
2	22-3039688-7	FREEDOM MORTGAGE CORPORATION	2144	3.7%	1857	9.2%	19.9%
3	0000852218-9	JPMORGAN CHASE BK NA	1878	12.6%	1419	7.0%	26.9%
4	0000004735-5	BETHPAGE FCU	1207	4.7%	1042	5.2%	32.1%
5	0000476810-9	CITIBANK NA	1235	8.7%	996	4.9%	37.0%
6	0000480228-9	BANK OF AMER NA	607	18.6%	407	2.0%	39.0%
7	33-0941669-7	PLAZA HOME MORTGAGE, INC.	471	17.0%	378	1.9%	40.9%
8	20-1436988-7	VANGUARD FUNDING LLC	537	4.5%	367	1.8%	42.7%
9	0000708412-1	FLAGSTAR BK FSB	474	20.3%	363	1.8%	44.5%
10	0000656733-9	MB FNCL BK NA	452	11.7%	345	1.7%	46.2%
11	26-4599244-7	LOANDEPOT.COM	436	11.7%	333	1.6%	47.9%
12	7811300008-7	HOMEBRIDGE FINANCIAL SERVICES	466	13.3%	317	1.6%	49.4%
13	7197000003-7	QUICKEN LOANS, INC.	398	22.4%	308	1.5%	51.0%
14	0000008116-5	TEACHERS FCU	326	6.4%	284	1.4%	52.4%
15	37-1542226-7	NEW PENN FINANCIAL LLC	403	10.9%	283	1.4%	53.8%
16	11-3290207-7	MCS MORTGAGE BANKERS	372	5.4%	279	1.4%	55.2%
17	11-3073502-7	UNITED MORTGAGE CORP	417	11.3%	272	1.3%	56.5%
18	0000112837-9	CAPITAL ONE NA	440	21.8%	266	1.3%	57.8%
19	1635900004-7	ENVOY MORTGAGE, LTD	342	5.6%	263	1.3%	59.1%
20	13-3753941-7	FRANKLIN FIRST FINANCIAL, LTD	414	7.0%	261	1.3%	60.4%
Total/Avg Top 20 Lenders			15989	11.6%	12205	60.4%	
Total All HMDA Reporters			27275	11.4%	20203	100.0%	

Table 9: Top 11 Banks Small Business Lending, 2016
Long Island (Nassau & Suffolk Counties)

Number of Loans																
	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	Signature	TD Bank	Top 10*	Top 11	OFI	
Number of Loans Ranking		16	5	17	3	4	20	12	2	31	26	8				
Long Island Total	92,138	422	6,540	417	12,498	7,159	297	926	15,147	67	219	2,387	46,012	46,079	46,059	
Long Island in LMI CT	13,657	78	1,175	97	2,180	1,082	40	148	1,835	10	45	309	6,989	6,999	6,658	
Loan Amt <= \$100,000	87,684	361	6,163	190	12,024	7,087	160	753	14,652	6	57	2,106	43,553	43,559	44,125	
Loan Amt <= \$100,000 in LMI CT	12,849	70	1,103	41	2,094	1,072	17	127	1,758	0	10	264	6,556	6,556	6,293	
Bus. w. GAR < \$1 M	40,529	181	3,184	162	6,974	5,427	117	540	385	17	32	696	17,698	17,715	22,814	
Bus. w. GAR < \$1 M in LMI CT	5,915	39	546	34	1,287	800	8	80	45	3	2	86	2,927	2,930	2,985	
Marketshare																
		Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	Signature	TD Bank	Top 10*	Top 11	OFI	
Long Island Total		0.5%	7.1%	0.5%	13.6%	7.8%	0.3%	1.0%	16.4%	0.1%	0.2%	2.6%	49.9%	50.0%	50.0%	
Long Island in LMI CT		0.6%	8.6%	0.7%	16.0%	7.9%	0.3%	1.1%	13.4%	0.1%	0.3%	2.3%	51.2%	51.2%	48.8%	
Loan Amt <= \$100,000		0.4%	7.0%	0.2%	13.7%	8.1%	0.2%	0.9%	16.7%	0.0%	0.1%	2.4%	49.7%	49.7%	50.3%	
Loan Amt <= \$100,000 in LMI CT		0.5%	8.6%	0.3%	16.3%	8.3%	0.1%	1.0%	13.7%	0.0%	0.1%	2.1%	51.0%	51.0%	49.0%	
Bus. w. GAR < \$1 M		0.4%	7.9%	0.4%	17.2%	13.4%	0.3%	1.3%	0.9%	0.0%	0.1%	1.7%	43.7%	43.7%	56.3%	
Bus. w. GAR < \$1 M in LMI CT		0.7%	9.2%	0.6%	21.8%	13.5%	0.1%	1.4%	0.8%	0.1%	0.0%	1.5%	49.5%	49.5%	50.5%	
Percentage of Long Island Loans In:																
	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	Signature	TD Bank	Top 10*	Top 11	OFI	
Long Island in LMI CT	14.8%	18.5%	18.0%	23.3%	17.4%	15.1%	13.5%	16.0%	12.1%	14.9%	20.5%	12.9%	15.2%	15.2%	14.5%	
Loan Amt <= \$100,000	95.2%	85.5%	94.2%	45.6%	96.2%	99.0%	53.9%	81.3%	96.7%	9.0%	26.0%	88.2%	94.7%	94.5%	95.8%	
Loan Amt <= \$100,000 in LMI CT	13.9%	16.6%	16.9%	9.8%	16.8%	15.0%	5.7%	13.7%	11.6%	0.0%	4.6%	11.1%	14.2%	14.2%	13.7%	
Bus. w. GAR < \$1 M	44.0%	42.9%	48.7%	38.8%	55.8%	75.8%	39.4%	58.3%	2.5%	25.4%	14.6%	29.2%	38.5%	38.4%	49.5%	
Bus. w. GAR < \$1 M in LMI CT	6.4%	9.2%	8.3%	8.2%	10.3%	11.2%	2.7%	8.6%	0.3%	4.5%	0.9%	3.6%	6.4%	6.4%	6.5%	
Total Amount of Loans (Millions of Dollars)																
	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	Signature	TD Bank	Top 10*	Top 11	OFI	
Dollar Volume of Lending Ranking		16	4	6	3	9	14	7	1	18	13	5				
Long Island Total	\$2,810.49	\$41.17	\$239.78	\$103.22	\$364.80	\$88.24	\$60.13	\$99.73	\$418.59	\$34.17	\$61.83	\$152.20	\$1,629.67	\$1,663.84	\$1,146.65	
Avg Loan Size (in thousands)	\$30.50	\$97.55	\$36.66	\$247.53	\$29.19	\$12.33	\$202.45	\$107.69	\$27.63	\$509.97	\$282.34	\$63.76	\$35.42	\$36.11	\$24.90	
Long Island in LMI CT	\$453.87	\$5.68	\$43.28	\$24.93	\$59.09	\$11.72	\$9.76	\$15.52	\$53.59	\$4.08	\$12.33	\$21.98	\$257.86	\$261.94	\$191.93	
Loan Amt <= \$100,000	\$1,240.57	\$15.69	\$99.11	\$10.85	\$207.10	\$59.93	\$7.27	\$42.95	\$205.67	\$0.50	\$3.49	\$45.28	\$697.34	\$697.84	\$542.73	
Loan Amt <= \$100,000 in LMI CT	\$179.01	\$2.95	\$15.41	\$2.71	\$29.79	\$8.00	\$0.91	\$7.70	\$24.19	\$0.00	\$0.67	\$6.41	\$98.75	\$98.75	\$80.27	
Bus. w. GAR < \$1 M	\$720.90	\$8.79	\$48.36	\$27.67	\$79.98	\$41.42	\$13.02	\$38.45	\$31.14	\$9.81	\$11.27	\$40.76	\$340.86	\$350.67	\$370.23	
Bus. w. GAR < \$1 M in LMI CT	\$110.45	\$2.37	\$5.95	\$7.69	\$11.96	\$5.01	\$0.67	\$6.13	\$3.82	\$1.40	\$0.79	\$6.61	\$51.00	\$52.40	\$58.05	
Marketshare																
		Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	Signature	TD Bank	Top 10*	Top 11	OFI	
Long Island Total		1.5%	8.5%	3.7%	13.0%	3.1%	2.1%	3.5%	14.9%	1.2%	2.2%	5.4%	58.0%	59.2%	40.8%	
Long Island in LMI CT		1.3%	9.5%	5.5%	13.0%	2.6%	2.2%	3.4%	11.8%	0.9%	2.7%	4.8%	56.8%	57.7%	42.3%	
Loan Amt <= \$100,000		1.3%	8.0%	0.9%	16.7%	4.8%	0.6%	3.5%	16.6%	0.0%	0.3%	3.6%	56.2%	56.3%	43.7%	
Loan Amt <= \$100,000 in LMI CT		1.6%	8.6%	1.5%	16.6%	4.5%	0.5%	4.3%	13.5%	0.0%	0.4%	3.6%	55.2%	55.2%	44.8%	
Bus. w. GAR < \$1 M		1.2%	6.7%	3.8%	11.1%	5.7%	1.8%	5.3%	4.3%	1.4%	1.6%	5.7%	47.3%	48.6%	51.4%	
Bus. w. GAR < \$1 M in LMI CT		2.1%	5.4%	7.0%	10.8%	4.5%	0.6%	5.6%	3.5%	1.3%	0.7%	6.0%	46.2%	47.4%	52.6%	
Percentage of Long Island \$ Lending In:																
	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	First NB of LI	HSBC	JPMC	NY Cmty Bk	Signature	TD Bank	Top 10*	Top 11	OFI	
Long Island in LMI CT	16.1%	13.8%	18.0%	24.1%	16.2%	13.3%	16.2%	15.6%	12.8%	11.9%	19.9%	14.4%	15.8%	15.7%	16.7%	
Loan Amt <= \$100,000	44.1%	38.1%	41.3%	10.5%	56.8%	67.9%	12.1%	43.1%	49.1%	1.5%	5.6%	29.7%	42.8%	41.9%	47.3%	
Loan Amt <= \$100,000 in LMI CT	6.4%	7.2%	6.4%	2.6%	8.2%	9.1%	1.5%	7.7%	5.8%	0.0%	1.1%	4.2%	6.1%	5.9%	7.0%	
Bus. w. GAR < \$1 M	25.7%	21.4%	20.2%	26.8%	21.9%	46.9%	21.7%	38.6%	7.4%	28.7%	18.2%	26.8%	20.9%	21.1%	32.3%	
Bus. w. GAR < \$1 M in LMI CT	3.9%	5.8%	2.5%	7.5%	3.3%	5.7%	1.1%	6.1%	0.9%	4.1%	1.3%	4.3%	3.1%	3.1%	5.1%	

Notes: Capital One includes Capital One Bank, NA and and Capital One, NA. JPMC includes Chase Bank USA, NA and JPMorgan Chase Bank, NA. NY Cmty Bk includes New York Community Bank and New York Commercial Bank.

AFI: All Financial Institutions; OFI: Other Financial Institutions; LMI CT: Low-Moderate Income Census Tracts

Notes: Signature Bank is included here because it made small business loans in 2016, even though it's not included in the mortgage lending tables. Top 10*: Does not include Signature. Loans/Lending Ranking is ranking among all lenders reporting CRA small business lending data.

Prepared by: Empire Justice Center, 585-454-4060

Table 10: Top 11 Banks Small Business Lending, 2015

Long Island (Nassau & Suffolk Counties)

Number of Loans															
	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	Signature	TD Bank	Wells Fargo	Top 10*	Top 11	OFI
Long Island Total	84,970	367	5,752	350	15,458	6,136	1,221	12,168	42	236	2,096	1,412	45,002	45,238	39,732
Long Island in LMI CT	12,671	75	995	102	2,700	1,012	220	1,477	4	52	253	184	7,022	7,074	5,597
Loan Amt <= \$100,000	81,054	312	5,357	169	14,956	6,075	1,015	11,698	7	79	1,834	1,328	42,751	42,830	38,224
Loan Amt <= \$100,000 in LMI CT	11,974	65	920	43	2,600	1,000	186	1,399	0	14	207	172	6,592	6,606	5,368
Bus. w. GAR < \$1 M	40,564	367	2,966	159	9,111	4,747	771	172	7	35	1,128	956	20,384	20,419	20,145
Bus. w. GAR < \$1 M in LMI CT	5,899	75	504	42	1,573	762	130	25	2	10	103	134	3,350	3,360	2,539
Marketshare															
	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	Signature	TD Bank	Wells Fargo	Top 10*	Top 11	OFI
Long Island Total	0.4%	6.8%	0.4%	0.4%	18.2%	7.2%	1.4%	14.3%	0.0%	0.3%	2.5%	1.7%	53.0%	53.2%	46.8%
Long Island in LMI CT	0.6%	7.9%	0.8%	0.8%	21.3%	8.0%	1.7%	11.7%	0.0%	0.4%	2.0%	1.5%	55.4%	55.8%	44.2%
Loan Amt <= \$100,000	0.4%	6.6%	0.2%	0.2%	18.5%	7.5%	1.3%	14.4%	0.0%	0.1%	2.3%	1.6%	52.7%	52.8%	47.2%
Loan Amt <= \$100,000 in LMI CT	0.5%	7.7%	0.4%	0.4%	21.7%	8.4%	1.6%	11.7%	0.0%	0.1%	1.7%	1.4%	55.1%	55.2%	44.8%
Bus. w. GAR < \$1 M	0.9%	7.3%	0.4%	0.4%	22.5%	11.7%	1.9%	0.4%	0.0%	0.1%	2.8%	2.4%	50.3%	50.3%	49.7%
Bus. w. GAR < \$1 M in LMI CT	1.3%	8.5%	0.7%	0.7%	26.7%	12.9%	2.2%	0.4%	0.0%	0.2%	1.7%	2.3%	56.8%	57.0%	43.0%
Percentage of Long Island Loans In:															
	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	Signature	TD Bank	Wells Fargo	Top 10*	Top 11	OFI
Long Island in LMI CT	14.9%	20.4%	17.3%	29.1%	17.5%	16.5%	18.0%	12.1%	9.5%	22.0%	12.1%	13.0%	15.6%	15.6%	14.1%
Loan Amt <= \$100,000	95.4%	85.0%	93.1%	48.3%	96.8%	99.0%	83.1%	96.1%	16.7%	33.5%	87.5%	94.1%	95.0%	94.7%	96.2%
Loan Amt <= \$100,000 in LMI CT	14.1%	17.7%	16.0%	12.3%	16.8%	16.3%	15.2%	11.5%	0.0%	5.9%	9.9%	12.2%	14.6%	14.6%	13.5%
Bus. w. GAR < \$1 M	47.7%	100.0%	51.6%	45.4%	58.9%	77.4%	63.1%	1.4%	16.7%	14.8%	53.8%	67.7%	45.3%	45.1%	50.7%
Bus. w. GAR < \$1 M in LMI CT	6.9%	20.4%	8.8%	12.0%	10.2%	12.4%	10.6%	0.2%	4.8%	4.2%	4.9%	9.5%	7.4%	7.4%	6.4%
Total Amount of Loans (Millions of Dollars)															
	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	Signature	TD Bank	Wells Fargo	Top 10*	Top 11	OFI
Long Island Total	\$2,598.72	\$37.18	\$240.33	\$87.21	\$422.77	\$79.21	\$118.45	\$370.17	\$18.22	\$60.26	\$144.57	\$76.49	\$1,594.59	\$1,654.85	\$943.87
Long Island in LMI CT	\$425.79	\$6.24	\$43.02	\$29.99	\$70.95	\$12.06	\$22.62	\$51.98	\$1.13	\$14.35	\$23.96	\$9.47	\$271.40	\$285.75	\$140.04
Loan Amt <= \$100,000	\$1,153.75	\$12.71	\$93.14	\$8.74	\$254.80	\$51.26	\$52.27	\$155.41	\$5.55	\$4.45	\$45.12	\$53.23	\$727.22	\$731.67	\$422.08
Loan Amt <= \$100,000 in LMI CT	\$165.21	\$2.37	\$13.97	\$2.55	\$36.72	\$6.86	\$9.61	\$18.61	\$0.00	\$7.3	\$6.13	\$6.49	\$103.32	\$104.04	\$61.16
Bus. w. GAR < \$1 M	\$741.59	\$37.18	\$48.37	\$30.59	\$114.23	\$37.67	\$47.32	\$25.93	\$3.26	\$15.87	\$45.00	\$41.32	\$430.86	\$446.74	\$294.85
Bus. w. GAR < \$1 M in LMI CT	\$105.36	\$6.24	\$5.49	\$9.31	\$15.39	\$4.34	\$9.39	\$3.83	\$0.80	\$5.67	\$4.44	\$5.75	\$64.98	\$70.64	\$34.71
Marketshare															
	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	Signature	TD Bank	Wells Fargo	Top 10*	Top 11	OFI
Long Island Total	1.4%	9.2%	3.4%	16.3%	3.0%	4.6%	14.2%	0.7%	2.3%	5.6%	2.9%	61.4%	63.7%	36.3%	
Long Island in LMI CT	1.5%	10.1%	7.0%	16.7%	2.8%	5.3%	12.2%	0.3%	3.4%	5.6%	2.2%	63.7%	67.1%	32.9%	
Loan Amt <= \$100,000	1.1%	8.1%	0.8%	22.1%	4.4%	4.5%	13.5%	0.0%	0.4%	3.9%	4.6%	63.0%	63.4%	36.6%	
Loan Amt <= \$100,000 in LMI CT	1.4%	8.5%	1.5%	22.2%	4.2%	5.8%	11.3%	0.0%	0.4%	3.7%	3.9%	62.5%	63.0%	37.0%	
Bus. w. GAR < \$1 M	5.0%	6.5%	4.1%	15.4%	5.1%	6.4%	3.5%	0.4%	2.1%	6.1%	5.6%	58.1%	60.2%	39.8%	
Bus. w. GAR < \$1 M in LMI CT	5.9%	5.2%	8.8%	14.6%	4.1%	8.9%	3.6%	0.8%	5.4%	4.2%	5.5%	61.7%	67.1%	32.9%	
Percentage of Long Island \$ Lending In:															
	AFI	Astoria	BOA	Bridgehampton	Capital One	Citigroup	HSBC	JPMC	NY Cmty Bk	Signature	TD Bank	Wells Fargo	Top 10*	Top 11	OFI
Long Island in LMI CT	16.4%	16.8%	17.9%	34.4%	16.8%	15.2%	19.1%	14.0%	6.2%	23.8%	16.6%	12.4%	17.0%	17.3%	14.8%
Loan Amt <= \$100,000	44.4%	34.2%	38.8%	10.0%	60.3%	64.7%	44.1%	42.0%	3.0%	7.4%	31.2%	69.6%	45.6%	44.2%	44.7%
Loan Amt <= \$100,000 in LMI CT	6.4%	6.4%	5.8%	2.9%	8.7%	8.7%	8.1%	5.0%	0.0%	1.2%	4.2%	8.5%	6.5%	6.3%	6.5%
Bus. w. GAR < \$1 M	28.5%	100.0%	20.1%	35.1%	27.0%	47.6%	40.0%	7.0%	17.9%	26.3%	31.1%	54.0%	27.0%	27.0%	31.2%
Bus. w. GAR < \$1 M in LMI CT	4.1%	16.8%	2.3%	10.7%	3.6%	5.5%	7.9%	1.0%	4.4%	9.4%	3.1%	7.5%	4.1%	4.3%	3.7%
AFI: All Financial Institutions; OFI: Other Financial Institutions; LMI CT: Low-Moderate Income Census Tracts															
Note: Signature Bank is included here because it made small business loans in 2015, even though it's not included in the mortgage lending tables. Top 10*: Does not include Signature.															
Prepared by: Empire Justice Center, 585-454-4060															

Appendix C: Mortgage Lending Maps

Figure 1: Total Number Loan Originations of All HMDA Reporters by Census Tract and Neighborhood Demographics, Nassau County, 2015

(All 1st lien loans on owner-occupied 1-4 family site-built units)

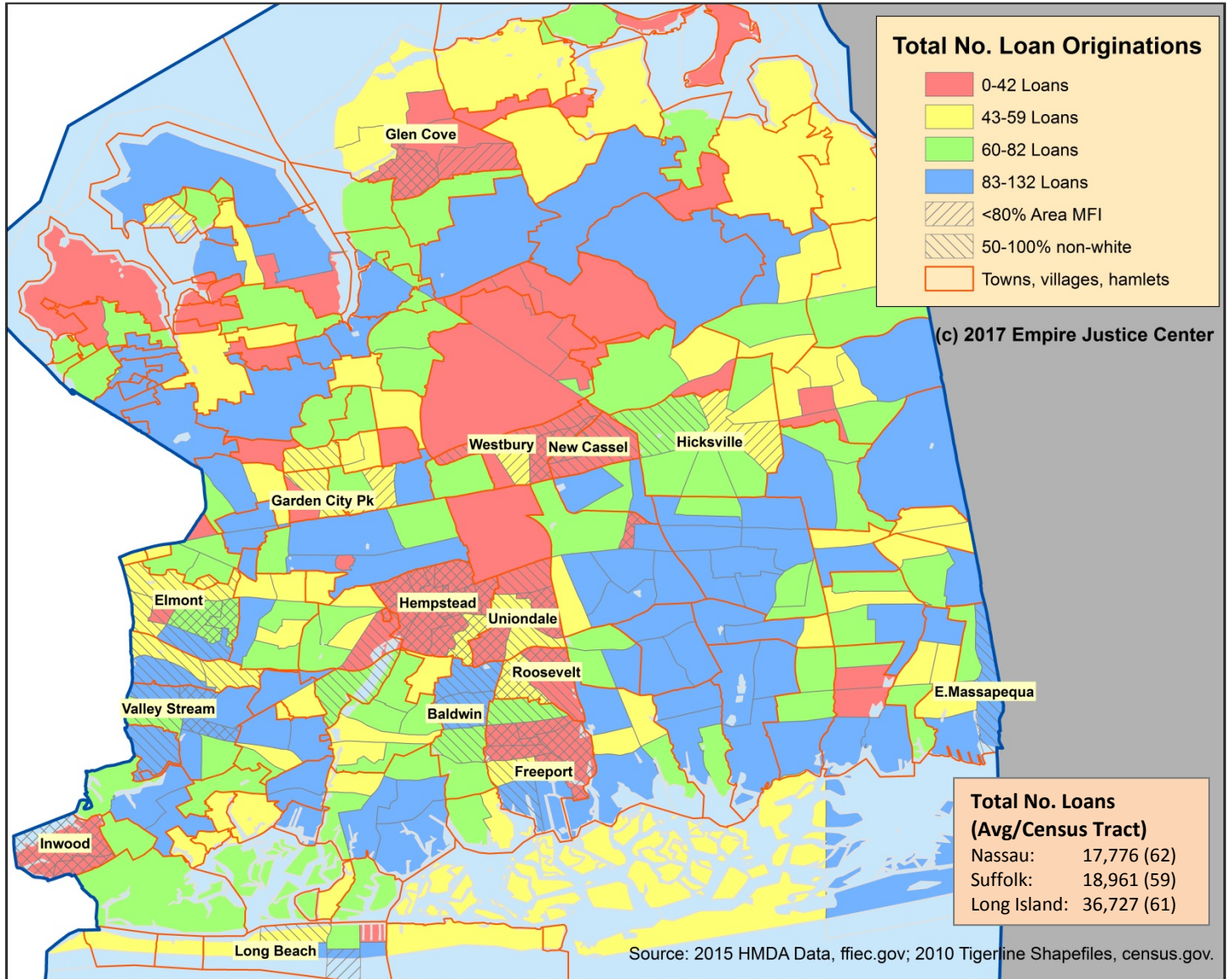


Figure 2: Home Purchase Loans Originations of All HMDA Reporters by Census Tract and Neighborhood Demographics, Nassau County, 2015

(All 1st lien home purchase loans on owner-occupied 1-4 family site-built units)

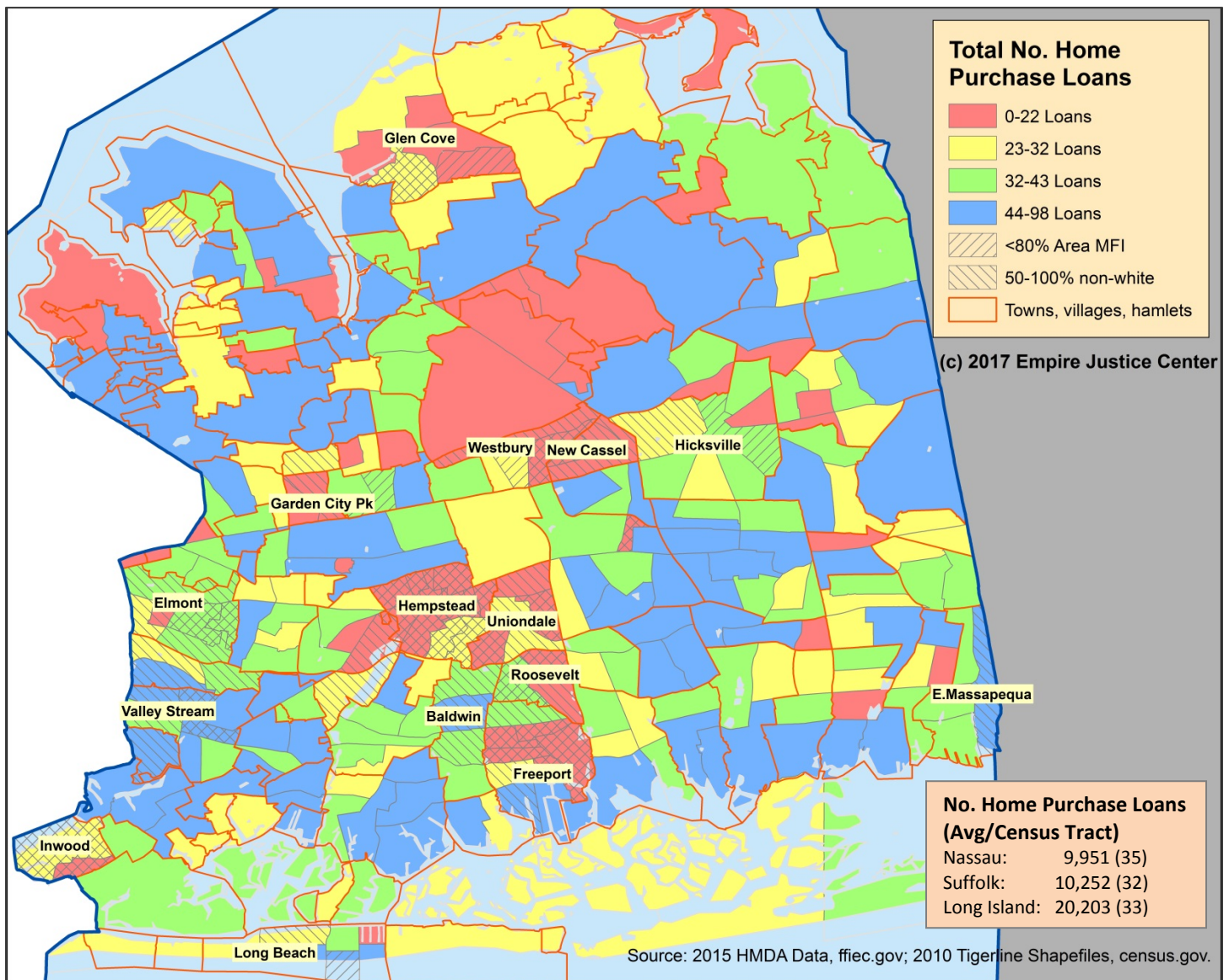


Figure 3: Total Loan Originations of All HMDA Reporters by Census Tract and Neighborhood Demographics, Western & Central Suffolk County, 2015
(All 1st lien loans on owner-occupied 1-4 family site-built units)

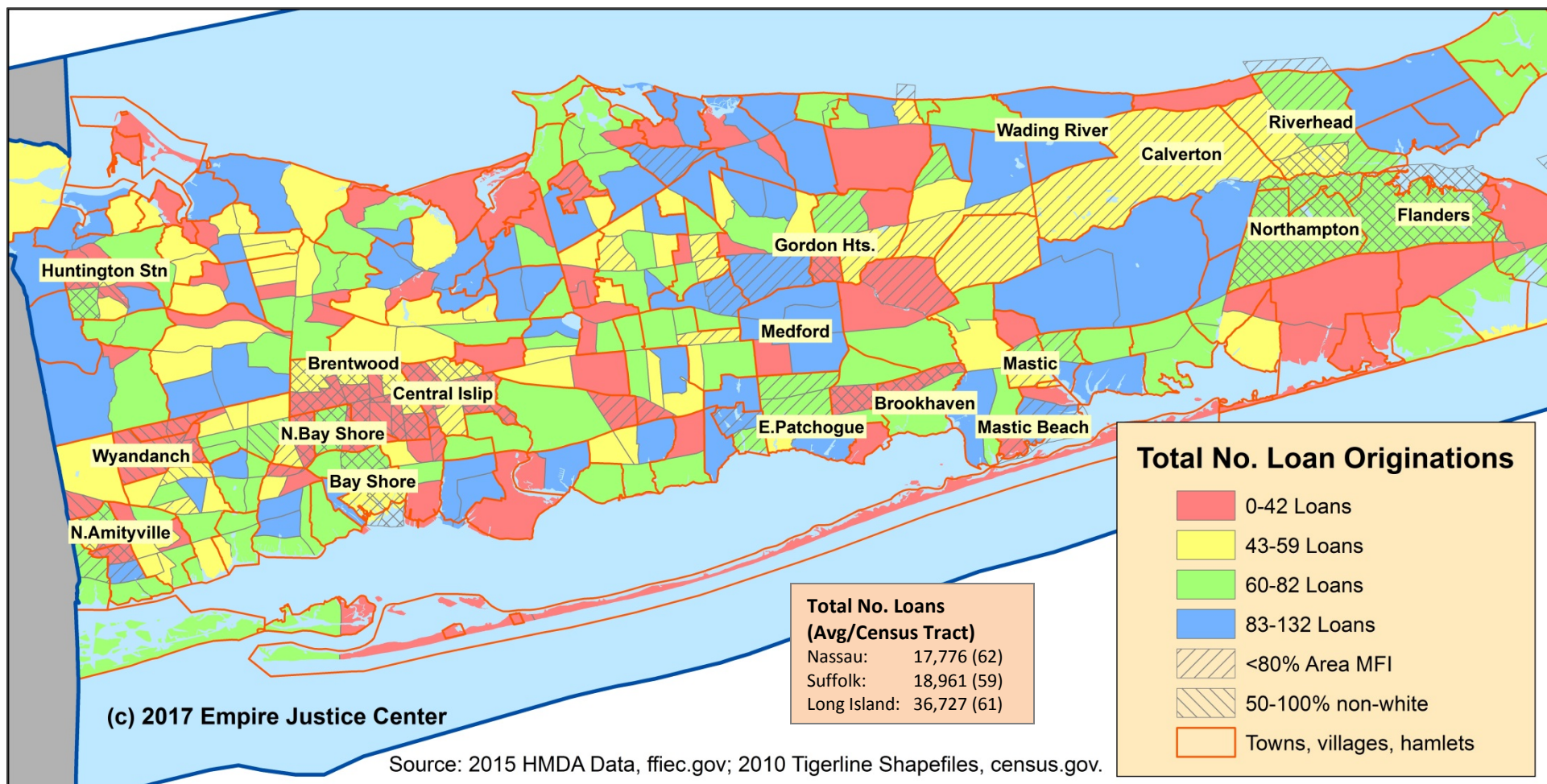


Figure 4: Home Purchase Loans Originations of All HMDA Reporters by Census Tract and Neighborhood Demographics, Western & Central Suffolk County, 2015

(All 1st lien home purchase loans on owner-occupied 1-4 family site-built units)

