



**GREATER ROCHESTER
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May 24, 2016

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RE: JPMC 2011-2013 CRA Performance in Rochester NY MSA

Dear Sir or Madam:

We are writing on behalf of the Greater Rochester Community Reinvestment Coalition (GRCRC) about the Office of the Comptroller of the Currency (OCC)'s examination of JPMorgan Chase (JPMC), pursuant to the Community Reinvestment Act (CRA) regulations, 12 CFR Part 25. We understand that the OCC is almost done with its evaluation; we ask that the OCC take these comments into account when rating JPMC's CRA performance for 2011-2013.

The Greater Rochester Community Reinvestment Coalition (GRCRC) was launched in 1993 to generate and continue discussions about lending patterns in Rochester. GRCRC, convened by Empire Justice Center, has met with numerous banks and state and federal regulators during CRA exams and mergers, and submitted dozens of data-driven comments to the appropriate state and federal regulators who have oversight of the banks. GRCRC, Empire Justice Center, and its predecessor organization Public Interest Law Office of Rochester, have released fifteen analyses of home mortgage, small business, and subprime lending over the past 22 years. The organizations use data driven analyses to identify strengths and weaknesses in lending patterns and to generate discussions with the top financial depositories in the Rochester NY MSA.¹

¹ Our most recent analysis, "The Lingering Storm: Mortgage Lending Disparities on Long Island," can be found at: <http://www.empirejustice.org/publications/reports/new/the-lingering-storm.html#.VnlvqE3ru70>. Our July 2015 report on lending in the Rochester MSA, "The River Runs Dry II: The Persistent Mortgage Drought in Rochester's "Communities of Color," can be found at: <http://www.empirejustice.org/publications/reports/new/river-runs-dry-2.html#.VnlwL03ru70>.

In March 2016, NYS Assemblymember David Gantt contacted Empire Justice Center after being told that the JPMorgan Chase branch on Portland and Clifford was slated for closure in June 2016. It was only during follow-up phone calls about the branch closure that we learned that the OCC was conducting a CRA exam.

As the second largest depository in the Rochester NY MSA, JPMorgan Chase is very important to the area. As of June 31, 2013, JPMorgan Chase had \$2.1 billion in deposits in its 29 branches and 13.7% of the market. Even though JPMC's assessment area is comprised of only three of the counties (Monroe, Ontario and Wayne) in the Rochester MSA, for comparability with its peers, we examine JPMC's mortgage and small business lending for the entire Rochester MSA, rather than just the three counties.

CRA Evaluations and LMI Branch Closures

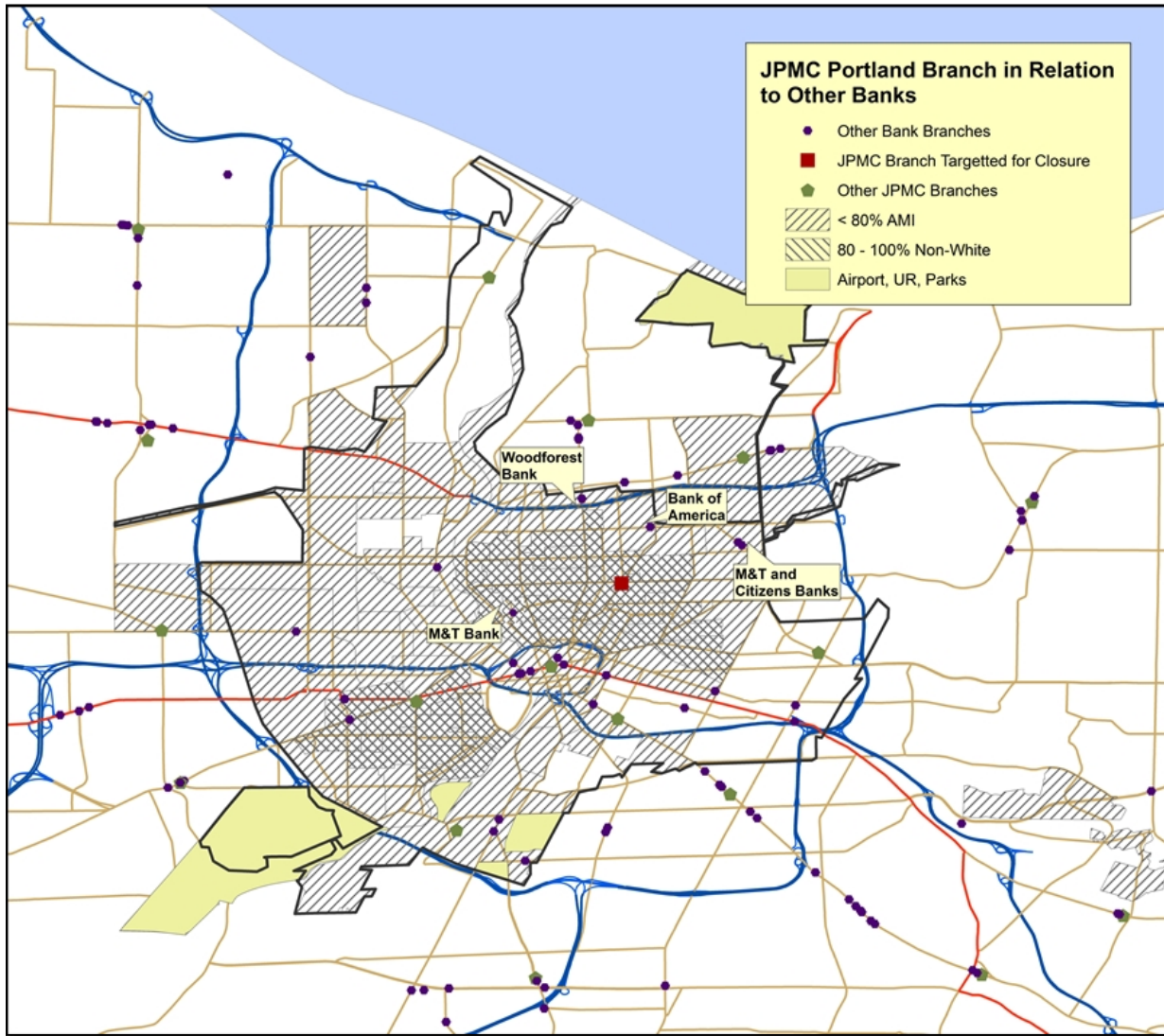
It is imperative that banks begin to better understand the post-recession credit needs of a majority of their customers as well as the tens of thousands of un- and underbanked residents of Rochester NY. Regulators need to begin ensure those needs are met by refusing to give those banks a satisfactory or higher CRA rating.

GRCRC urges the OCC to take into account in its CRA performance evaluation JPMorgan Chase's planned June 16th closure of its Portland-Clifford branch, a branch in a low-moderate income (LMI) community and neighborhood of color in the city of Rochester.

In this letter up to p. 12 "JPMorgan Chase's CRA-Related Reinvestments in the Rochester Community," we are reiterating our letter to the OCC dated May 19, 2016, where we describe the existing and future credit needs of low and moderate income (LMI) families and businesses located in the vicinity of the JPMC LMI branch at Portland and Clifford. Starting at p. 12, we focus our analysis and summary of community credit and investment opportunities more directly on the CRA exam.

The neighborhood surrounding JPMC's Portland-Clifford branch is a minority majority neighborhood with an African American and Latino population. In addition, the branch is located in a high poverty neighborhood. Many residents do not have access to cars. Furthermore, the very limited public transportation in Rochester means that branch customers could spend an hour each way on buses to access the nearest alternative branches, both JPMC and other banks. A map showing the locations of adjacent branches is below.

The bank branch desertification of northeast Rochester



The other banks with branches in the northeast section of Rochester are one or more miles away (using Google Maps) from JPMorgan Chase's branch at 520 Portland Avenue. Going clockwise:

- Woodforest Bank is 1.8 miles away
- Bank of America is 1 mile away
- M&T Bank on Waring is 2 miles away
- Citizens Bank is 1.9 miles away
- M&T on Upper Falls Blvd is 1.3 miles away

In light of the factors described in our letter of May 19 and this letter, we request that the OCC delay the branch closing. This would enable JPMC to offer the financial services much needed by the residents of that neighborhood. Since the OCC is conducting a CRA exam, it is imperative that the OCC look at JPMC's failure to offer loan products and services that serve

JPMC customers and other underbanked residents of the neighborhood. **In fact, JPMC should not receive a satisfactory or higher rating in its current CRA exam.**

We echo the concerns made by our New York City colleagues in a letter to the OCC dated November 2015. That letter describes many of the same credit needs and JPMC's failure to meet them.² 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.³

JPMC is proposing to close the Portland-Clifford branch due to lack of traffic. The residents of that neighborhood have pertinent credit needs. However, JPMC fails to provide safe, affordable products, appropriately priced for risk, which has and will continue to will force the residents to access credit from fringe lenders at unaffordable rates. This traps them into a cycle of poor credit scores leaving them unable to access mainstream financial products. Below we describe the community credit needs of the city of Rochester and programs to meet those needs.

GRCRC and its members have a deep understanding of the needs of low and moderate income families and communities in the Rochester MSA. We have worked closely with the City of Rochester and banks with CRA obligations to understand the evolving needs of the LMI population and have worked with them to design products that meet such need. Consumer Credit Counselling Service of Rochester, NeighborWorks® Rochester and The Housing Council at Pathstone (also a NeighborWorks® affiliate) have decades of experience working with the LMI population in Rochester. They have partnerships with local financial institutions that fund a host of innovative programs to teach financial capability and repair credit so residents can access mainstream financial products. In addition, local CDFIs offer loans to borrowers who do not meet traditional underwriting guidelines. Unfortunately, existing programs serve only a tiny percentage of the unmet need.

Many of our concerns were shared on May 17th at a meeting of GRCRC members, elected officials and City of Rochester staff with OCC staff Bonita Irving and Andrea Rosen.

Community Credit Needs

An April 12th presentation by the Federal Reserve Bank of New York and subsequent discussion with Rochester area not-for-profits and financial institutions showed that a significant portion of city of Rochester residents are non-participants in the credit market, and thus are not developing a credit file or score.

² This comment letter is found at: <http://www.neweconomynyc.org/wp-content/uploads/2015/12/FINAL-2015-Chase-CRA-Comment.pdf>

³ http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2699279

Rochester has the highest percentage of children in poverty in the nation. More than 50% of children in the City of Rochester live in poverty.⁴ Rochester has launched the Rochester Monroe Anti-Poverty Initiative (RMAPI) to address this crisis. The initiative is data driven, with local advocates and local low income residents involved in the design. It recognizes that solutions don't work in silos. Deep multi-generational poverty needs solutions at multiple levels. The Portland-Clifford branch is in Marketview Heights, one of the neighborhoods that have been chosen as a pilot to address this crisis.⁵ The pilot will serve as a guide not just for Rochester but for neighborhoods throughout New York. Governor Andrew Cuomo has allocated millions of dollars to address this concentration of poverty in additional cities in New York. A bank located in the heart of the neighborhood, that offers safe affordable products to its residents is a key element of the anti-poverty initiative. With tens of thousands of city of Rochester residents unbanked, many of them in the Marketview Heights neighborhood and near the Portland-Clifford branch, the closing of this branch has implications that extend beyond northeast Rochester. It could not have come at a worse time for the City of Rochester and all LMI New Yorkers.

Residents of LMI neighborhoods are meeting their financial needs by using fringe businesses that strip wealth from these communities. These trends have many causes, and not all solutions rest with financial institutions. However, financial institutions are a key component of the solution.

In order to successfully move into the credit market and build good credit, city of Rochester residents need financial capability training. Financial institutions and Rochester area foundations, in conjunction with the Rochester Monroe Anti-Poverty Initiative (RMAPI), need to come together to formulate a multi-year plan to address this need.

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.

African American and Latino borrowers and neighborhoods have historically been targeted for predatory home loans. While, thanks to Dodd-Frank and strong New York State laws, most predatory mortgage lending has been shut down, borrowers and communities of color are now being targeted for higher cost consumer products.

To date, the providers of these products are subject to little or no regulation and adversely impact the ability of black and Latino families to save for a computer, car, home, education or

⁴ <http://www.democratandchronicle.com/story/news/2014/09/18/rochesters-children-live-poverty/15856493/>

⁵ Map of pilot neighborhood can be found at: <http://www.uwrochester.org/getattachment/Our-Work-Results/Rochester-Monroe-Anti-Poverty-Initiative/Rochester-Monroe-Anti-Poverty-Initiative-Media/Neighborhood-focused-partnership-map.pdf.aspx?lang=en-US>

retirement. Consumer advocates have worked to address the worst of these abuses through legislation and litigation. While we are hopeful of work that is being done by the CFPB, we still have a long way to go. Fringe lenders continue to exert their lobbying power at state and federal levels to preserve their profits that run into the billions of dollars.

We now have a wealth of information documenting the damage done by fringe lenders, as wealth is stripped from LMI communities by check cashers, payday lenders and auto dealers. Federal regulators, who supervise banks, must act on the research and economic data to require banks to develop and market products that serve LMI communities.

A study conducted 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.⁶ Consumers resort to rent to own stores instead of being able to obtain a small dollar loan to purchase an item at market price. As a result, 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 their 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.⁷ The wealth gap between black and white families has increased since the Great recession.⁸ As housing prices have rebounded since the Great Recession in white neighborhoods, home equity has increased. Communities of color have not seen a similar rise in housing prices.⁹

In light of these factors, safe, affordable products are essential for those consumers. The products should be marketed to consumers with a credit score as low as 500-600. The interest rate and fees charged should be commensurate with the true risk of making such loans. GRCRC proposes three consumer loan products—a closed-ended small dollar loan, an unsecured home improvement loan, and a responsible auto loan.

⁶ 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_collection_improvement_act_97.pdf.

⁷ <https://www.propublica.org/article/debt-collection-lawsuits-squeeze-black-neighborhoods>

⁸ <http://www.pewresearch.org/fact-tank/2014/12/12/racial-wealth-gaps-great-recession/>

⁹ <http://www.businessinsider.com/great-recession-exacerbated-a-big-racial-disparity-in-the-housing-market-2015-6>

Small dollar loan

The story below illustrates the financial harm to New Yorkers faced with an emergency and needing a small dollar loan.

In winter of 2013/2014, Ms. R refinanced a used 2009 car with over 70,000 miles on it. She financed over \$10,000 at an interest rate of 24.98% and a finance charge of over \$6,000. She now owes more than her car is worth.

Ms. R obtained this predatory loan because she needed an emergency loan to pay a few missed car payments of \$250 a month. Her husband had just passed away and there was a time lag before she received his social security. The months surrounding her husband's death were hard on Ms. R. She had just lost her parents, and her grandson had begun treatment for cancer. Then, later in 2014, her eldest son, who had returned home to live with her due to illness, passed away.

Ms. R could have greatly benefited from a small dollar loan. In fact, she had a checking account with a financial institution with a small dollar product. She could have accessed the small dollar loan had she known about it, but the product was not widely advertised.

While it is impossible to do an exact "what if" financial calculation, it is safe to say that Ms. R's inability to avail herself of a small dollar loan cost her thousands of dollars in interest payments on a used car that was worth less than the amount she borrowed.

It is our understanding that JPMC does not have a small dollar loan product for customers with a direct deposit checking account. We appreciate that small dollar loans need to be fairly priced for risk so that they are sustainable and profitable. At the same time, banks should not be allowed to charge interest rates that are abusive. CDFIs have a lot of experience in lending to credit stressed customers and we welcome the opportunity to work with JPMC on this issue. Not only does JPMC fail to provide a fairly priced emergency small dollar loan to its customers, it has a lucrative overdraft product that generates billions of dollars in fee income. As documented in the November 11th letter to the OCC by the New Economy Project and 16 other NYC advocates, "In the first half of 2015, Chase collected \$871 million in overdraft fees from its customers, and charged more in overdraft fees in the first three months of 2015 than any other bank in the country."¹⁰

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, we recommend a **closed-end small dollar loan product** with the following characteristics: (1) The product would be for JPMC customers with direct deposit; (2) the amount would range from

¹⁰ <http://www.neweconomynyc.org/wp-content/uploads/2015/12/FINAL-2015-Chase-CRA-Comment.pdf>

\$250- \$1,000 for a 12 month term; (3) it would have a true risk-based interest rate; (4) the credit score would be as low as 540.

In 2014 ESL Federal Credit Union successfully launched a small dollar loan product (\$250-\$1,000) with a six-month term, a current interest rate of 27.99%, no credit-check for its direct deposit members, and several protections for the consumer to avoid repeat use leading to abuse. The product was initially informally marketed in the branches. It is now widely marketed and demonstrates both the need and long term feasibility of such products.¹¹

Unsecured home improvement loan

Housing prices have not increased in many low-moderate income communities in Rochester NY for decades, and they have declined in some neighborhoods. The housing stock is old, and homeowners need roofs, furnaces and windows replaced. To meet that need, GRCRC urges JPMC to develop an **unsecured home improvement loan product** for amounts up to \$15,000 for homeowners whose first mortgage is at 100% of LTV. The interest rate should be prime plus 5%. In addition, homeowners could have credit scores as low as 550, and a back-end debt-to-income ratio of 45%.

Auto loan

Auto dealers upsell buyers of color, charging them higher interest rates than they qualify for, given comparable credit scores. As of the Q3 2014, 39% (\$336 billion) of the auto loan market was comprised of subprime borrowers.¹² GRCRC members have told us that many of these borrowers are at risk of being charged 24.98%, even when they could have qualified for lower interest rates.

A bank employee with a C credit score was unable to obtain a \$6,000 used car loan from the bank she worked at. She owns her own home. Her credit was impaired due to a family member's unexpected health emergency that resulted in uncovered medical expenses. She was able to obtain a 3 year loan at a rate of 8.74% from a CDFI. Unfortunately, there are many consumers who end up with much higher interest rates through dealers.

It has been shown that women and people of color are being given unaffordable and marked up credit when they shop for auto loans. (See story of Ms. R above). While the Consumer Financial Protection Bureau (CFPB) is trying to impact these discriminatory pricing policies, it is being met with resistance. With inadequate public transportation and jobs moving to the suburbs, New

¹¹ <https://www.esl.org/personal/loans/short-term-loan>.

¹² http://www.responsiblelending.org/other-consumer-loans/auto-financing/research-analysis/recklessdriving_implications_subprime_autofinance_growth.pdf

Yorkers need affordable credit for used car loans. To address this need, GRCRC asks JPMC to develop a **used auto loan product** with the following: (1) For amounts of \$5,000-\$15,000 for up to a 60 month term; (2) With interest rates of 10-18%; (3) And where credit scores can be as low as 600.

We recognize that some customers will not qualify for the products described above. GRCRC urges JPMC to invest at an affordable interest rate, in our local **community development financial institutions (CDFIs)** such as **NeighborWorks® Rochester, PathStone Enterprise Center** and **Genesee Co-op Federal Credit Union**, so they can develop and offer these products, as well as other affordable and responsible banking, mortgage lending and small business products that can assist homeowners, businesses and residents in all city neighborhoods.

Residents need to have access to safe, affordable bank accounts at financial institutions as opposed to check cashers. Over time, LMI residents should be able to access mainstream products from regulated financial institutions, including:

- Small dollar loans to pay for emergencies
- Secured credit cards
- Small dollar loans instead of rent-to-own stores or leasing products at discount furniture stores
- Affordable low cost auto loans instead of unaffordable predatory auto loans

In addition to appropriate marketing to learn about the products, many consumers will need financial literacy training in order to access them. While the financial literacy training is a grant and does not result in an immediate tangible return to the banks, the goal is to shift the large profits made by check cashers, rent-to-own stores and similar predatory services to banks that provide affordable credit building products. This will in turn increase the borrower base and ultimately be profitable for the banks. (See box on next page.)

Many financial literacy and capability programs already exist in Rochester. Scaling them up would expand the number of residents who can receive these services. We know that JPMC has a program with Consumer Credit Counselling Service of Rochester to help residents in workforce development. In addition, JPMC provides funding for the **C.A.S.H. Coach Program** at Empire Justice Center. JPMC also provides grant funding to **NeighborWorks® Rochester** for a “financial fitness” education program. GRCRC members are grateful for that support.

At this point in time JPMC does not directly contribute to the programs at **PathStone Corporation** or **The Housing Council at PathStone**. Pathstone has services targeted to the LMI population of Rochester to achieve homeownership, prevent foreclosure and increase financial

Meeting Community Credit Needs

1. Get consumers who are in the Chex system banked, including classes on how to address credit issues so they can open an account.
2. Financial capability training so borrowers can qualify for small dollar loans, both emergency and fixed term.
3. Basic bank accounts without overdraft fees to replace use of check cashers.
4. Small dollar loans for emergencies to replace use of payday lenders. These would be for bank account holders with direct deposit and have interest rates priced for risk.
5. Small dollar loans to replace use of rent-to-own stores. This will enable parents to buy their children a computer at one-third of the price and without losing the computer after paying three times the retail or sale price of the computer. Rent-to-own users often have the item repossessed after they have paid 90% of the triple price of the item.
6. Auto loans priced for risk.
7. Investments in community development financial institutions (CDFIs) for un/under-banked who don't qualify for the loans described above. The CDFIs can make some of the loans described above.
8. Mortgage portfolio products with down payment and closing costs assistance aimed at LMI households.
9. Small business loans to businesses with gross annual revenues under \$1 million.

capabilities. We applaud these programs and ask JPMC to increase funding to these programs to meet the needs of the LMI population.

Global Banks Should Have Staff with Local Connections, Knowledge and Expertise

Many upstate New York local and regional banks are headquartered in Rochester or Western New York. The wellbeing of many these institutions is closely tied to the wellbeing of upstate New York.

For these local/regional depositories, the Rochester MSA market is a significant proportion of both their depositary and lending/investment market share. As a result, they have senior level staff who have decision making power and can be nimble in designing and revising programs to

meet the needs in Rochester. They can also vary those products for upstate New York, and the surrounding states adjacent to New York. Empire Justice Center and GRCRC work closely with senior staff; there is regular dialogue initiated by both Empire Justice/GRCRC and the banks.

JPMC is a global bank and the Rochester market is 0.2% of its 2015 U.S. market. Decision making at JPMC and other global banks is far removed from the local communities they serve. In 2011, GRCRC commented on the JPMC 2007-2010 CRA evaluation, where Rochester received a full-scope review. According to that performance evaluation, Rochester deposits then made up 45% of JPMC's New York State deposits outside the New York-Northern New Jersey-Long Island MMSA.

GRCRC advocates believe it is imperative for global banks such as JPMC to have senior staff with close ties to the communities they serve. In January of 2016, GRCRC commented on the proposed merger of Key Bank and First Niagara Financial Group. Our comments were prepared in coordination with over a dozen CRA advocates in Buffalo and Albany, NY, Ohio and Pennsylvania. A common theme GRCRC found was that some key decision making as well as underwriting should continue to be located in each community. These communities are all post-industrial economies and have not seen the same level of recovery from the recession that other parts of the country. This is borne out by research on income changes described in a Pew report published this May. In Rochester between 2000 and 2014, the percentage of middle income households has declined as lower income households have increased. The decrease in Rochester was significant, measuring 6%, compared to the national drop of 4%.¹³

As the wealth gap widens, it is imperative that the OCC encourage global banks to have some senior staff with decision making power at the local level and that some of the staff who work on CRA products live and work in the local community. This is particularly true for a bank such as JPMC, which is headquartered in NYC. NYC's economy and housing market are very different from the local conditions in Rochester.

On May 13th, JPMC shared the names and contact information for senior staff who are involved in addressing LMI needs. We look forward to meeting some of these staff members many of whom are new to GRCRC. Unfortunately, none of the staff with decision making power on product design or underwriting criteria appear to be located in upstate NY. That absence of local knowledge is deeply concerning. It is also symptomatic of how the community heard about the branch closing. If senior JPMC staff included in the decision making process were living in Rochester, they would have been aware of the local poverty initiative and could have brought that knowledge into the conversation about the branch closing, noting how it impacts not just the city, but the entire state.

¹³ <http://www.pewsocialtrends.org/2016/05/11/americas-shrinking-middle-class-a-close-look-at-changes-within-metropolitan-areas/>

Technology makes regular communication easier, and “face-to-face” meetings can occur with participants located all over the country. At the very least, we look forward to using technology to improve communication with JPMC.

JPMorgan Chase’s CRA-Related Reinvestments in the Rochester Community

As we have done for JPMC’s past two CRA exams,¹⁴ we gathered data on the bank’s CRA-related investments in the Rochester MSA, including mortgage originations to LMI households or in LMI census tracts, small business lending to businesses in LMI census tracts or to businesses with gross annual revenues under \$1 million, community development lending and investments and CRA-eligible grants.

We compared JPMorgan Chase CRA-related investments from 2010 (from the last CRA exam cycle) through 2014 (the most recent public data), while focusing on changes from the last year of the last CRA exam, 2010, to the last year of this exam cycle, 2013. Below is a comparison of the data from 2010 and 2013.

In 2010:

- JPMC had \$1.3 billion in deposits for 9% of the Rochester MSA depository market.
- JPMC had \$123.2 billion in capital.
- JPMC made an estimated \$76.2 million in CRA-related investments.
- JPMC reinvested 5.9% of its deposits, and 0.062% of its capital, into the Rochester community.

In 2013:

- JPMC had \$2.1 billion in deposits for 13.7% of the Rochester MSA depository market, and an increase of \$789 million or 61% from 2010.
- JPMC had \$169.1 billion in capital, an increase of \$45.9 billion or 37%.
- JPMC made an estimated \$55.3 million in CRA-related investments, a decrease of \$20.9 million or 27% from 2010.
- JPMC reinvested 2.7% of its deposits into the Rochester community, a decline of 3.2 points or 55% from 2010. With respect to capital, the bank reinvested 0.033% of its capital into the Rochester community, a decline of 0.029 points or 47% from 2010.

The table below gives the details of JPMC’s CRA-related investments in the Rochester MSA for 2010 - 2014. A review of it suggests that the decline in JPMC’s CRA-related investments is mainly due to the decline in annualized CD lending and investments between 2010 and 2013.

¹⁴ See GRCRC comment letters dated July 13, 2007 and June 29, 2011, the second of which is found at: <http://www.empirejustice.org/assets/pdf/policy-advocacy/grcrc-comments-on-jpmorgan.pdf>

- In 2010, JPMC’s annualized CD lending and investments were \$50.4 million.
- Between 2011 and 2013, JPMC’s CD lending and investments averaged \$18.5 million per year.
- The bank’s annualized CD lending and investments declined by \$31.8 million or 63%.

JPMC’s LMI mortgage and small business dollar volume lending was higher in 2013 than in 2010, despite the declines in the lending volumes between 2012 and 2013.

- JPMC’s mortgage lending to LMI households or in LMI census tracts was \$27.5 million in 2013, an increase of \$9.1 million or 49% from the \$18.4 million in lending in 2010.
- JPMC’s small business lending to businesses in LMI census tracts or to businesses with gross annual revenues under \$1 million was \$8.9 million in 2013, an increase of \$1.8 million or 26% from \$7.1 million in lending in 2010.

JPMC's Community Development Lending, Investments and Grants and CRA Eligible Mortgage and Small Business Lending (in millions)							
Rochester NY MSA, 2010-2014							
	2010	2011	2012	2013	2014	# Change 2010-2013	% Change 2010-2013
FDIC Deposits	\$ 1,292.9	\$ 1,780.1	\$ 1,737.0	\$ 2,081.7	\$ 2,196.4	\$ 788.8	61%
Depository Market Share	9.0%	11.9%	11.8%	13.7%	13.9%	4.6%	51%
Total bank equity capital ^{^^}	\$ 123,217.0	\$ 130,777.0	\$ 146,025.0	\$ 169,077.0	\$ 185,623.0	\$ 45,860.0	37%
LMI Mortgage Lending*	\$ 18.4	\$ 25.1	\$ 30.9	\$ 27.5	\$ 7.3	\$ 9.1	49%
LMI Small Business Lending**	7.1	8.6	11.3	8.9	8.6	1.8	26%
Total LMI Mortgage and LMI Small Business Lending	\$ 25.5	\$ 33.7	\$ 42.2	\$ 36.3	\$ 15.9	\$ 10.9	43%
Annualized Community Development Lending & Investments***	50.4	18.5	18.5	18.5	20.5	(31.8)	-63%
CRA-Eligible Grants [^]	0.41	0.47	0.47	0.47	0.42	0.1	15%
Total Annual CRA-Related Reinvestments	\$ 76.2	\$ 52.7	\$ 61.2	\$ 55.3	\$ 36.9	\$ (20.9)	-27%
Percent of deposits reinvested in community	5.9%	3.0%	3.5%	2.7%	1.7%	-3.2%	-55%
Percent of bank equity capital reinvested in community	0.062%	0.040%	0.042%	0.033%	0.020%	-0.029%	-47.1%
^{^^} As of 12/31, from line 12, Schedule R1-A in the Consolidated Reports of Condition and Income for A Bank With Domestic and Foreign Offices - FFIEC 031. Also called Call/TFR report, as found at https://cdr.ffiec.gov/public/ManageFacsimiles.aspx							
* Includes all mortgage originations to low-moderate income households and/or in low-moderate income census tracts for that year (unduplicated).							
** Includes CRA small business loans in low-moderate income census tracts or to businesses with gross annual revenues under \$1 million for that year (unduplicated); 2010 and 2014 calculated by Empire Justice, 2011-2013 reported by JPMC.							
*** Annualized from numbers reported by JPMC.							
[^] 2010-2013 are annualized from numbers reported by JPMC; 2014 is actual number reported by JPMC.							
Prepared by Empire Justice Center, 5/20/16.							

We included the 2014 lending and reinvestment numbers because we are deeply concerned by the declines in JPMC’s LMI mortgage and small business dollar lending volumes, leading to a significant further decline in its total annual CRA-related investments from \$55.3 million in 2013 to \$36.9 million in 2014. **As a result of the decline in investments, despite a slight increase in deposits and a significant increase in its capital, JPMC reinvested only 1.7% of its 2014 deposits, or 0.020% of its capital, back into the Rochester community.** Clearly, JPMC’s CRA-related investments are not keeping pace with the growth in its capital or deposits.

We urge the OCC to begin the next CRA exam for 2014-2016 immediately so that it can be completed by the end of 2017. That the exam for 2011-2013 is being completed in 2016, 2 ½ years after the close of 2013, is too much of a delay for any meaningful and relevant conversations about improving communities in a timely manner.

JPMorgan Chase Mortgage Lending, 2011-2013

We examined JPMC’s mortgage lending originations in several ways—total number of originations (1st lien loans on owner-occupied 1-4 family site-built units), total dollar volume of originations and home purchase originations. We looked at changes in lending over time and how JPMC compared to its peer depositories. We focus on originations because they show how well a bank or lender is directly serving the community, as well as indicate whether a lender has mortgage loan products that fit the community, particularly low and moderate income borrowers. Appendices I and II include several mortgage lending tables:

- Appendix I
 - JPMorgan Chase Total Lending Marketshare and Distribution
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JPMC Total Mortgage Lending

As seen in the table labeled “JPMorgan Chase Total Lending Marketshare and Distribution,” JPMC originated 628 loans in 2013 in the Rochester MSA, an increase of 10% from 2011. Except for loans to LMI households, the number of loans the bank originated to the different communities increased at rates significantly higher in the MSA rate of 10%. In 2013, JPMC made:

- 67 loans in the city, an increase of 29% from 2011
- 52 loans to Black and Latino households, an increase of 93% from 2011
- 273 loans to LMI households, an increase of 9% from 2011
- 91 loans in LMI census tracts, an increase of 47% from 2011
- 39 loans in minority census tracts, an increase of 50% from 2011

JPMC performed well in comparison to all financial institutions (AFI) in the distribution of its loans to these communities. The percentage of JPMC’s loans going to each community was higher than that for AFI for every year between 2011 and 2013. In addition, JPMC’s market share in almost every one of these communities each year was higher than its MSA market share.

Our one major area of concern is JPMC's dramatic decline in lending in the Rochester MSA and in every community in 2014.

JPMC Home Purchase Lending

As seen in the table labeled "JPMorgan Chase Home Purchase Lending Marketshare and Distribution," JPMC originated 348 home purchase loans in 2013 in the Rochester MSA, an increase of 19% from 2011. Except for loans to LMI households, which declined, the number of loans the bank originated to the different communities increased at rates significantly higher in the MSA rate of 19%. In 2013, JPMC made:

- 35 loans in the city, an increase of 52% from 2011
- 33 loans to Black and Latino households, an increase of 200% from 2011
- 160 loans to LMI households, a decrease of 7% from 2011
- 55 loans in LMI census tracts, an increase of 34% from 2011
- 21 loans in minority census tracts, an increase of 62% from 2011

JPMC performed well in comparison to all financial institutions (AFI) in the distribution of its loans to these communities. Except for loans in the city and to Black and Latino households in 2011, the percentage of JPMC's loans going to each community was higher than that for AFI for every year between 2011 and 2013. In addition, with the exception of the city and Black and Latino households in 2011, JPMC's market share in each community each year was higher than its MSA market share.

Again, our major area of concern is JPMC's dramatic decline in home purchase lending in the Rochester MSA and in every community in 2014. The city, Black and Latino households, LMI census tracts and minority census tracts each recorded less than 20 loans from JPMC in 2014 due to the bank's decline in home purchase originations.

Comparing JPMC Mortgage Lending to Its Peers

As noted above, Appendix II includes tables comparing the mortgage lending of the top 8 depositories in the Rochester NY MSA for 2011 – 2014. Here we will look at JPMC's lending in comparison to the other top banks for 2013, the last year of the exam period, focusing specifically on the tables "Top 8 Banks Total Mortgage Originations 2013" and "Top 8 Banks Home Purchase Originations 2013." Remember, as noted earlier, JPMorgan Chase ranked 2nd with \$2.1 billion in deposits as of June 31, 2013 and 13.7% of the Rochester MSA market.

Total Mortgage Originations

As seen by the “Top 8 Banks Total Mortgage Originations 2013” table, JPMC originated a total of 628 mortgage loans in 2013, giving it 3% of the Rochester MSA market, and putting it in 4th place behind Canandaigua National Bank and Trust (CNB), M&T Bank, and First Niagara Bank (FNFG).

Despite higher shares of the total mortgage lending market in the various different communities (between 4-7%), JPMC did not rise above its 4th place ranking, except for loans in LMI census tracts, where it ranked 3rd.

We would expect that a bank’s lending rank would be similar to its depository market share rank. JPMC, however, fails to do this for the MSA and in the different communities.

Home Purchase Loan Originations

As seen by the “Top 8 Banks Home Purchase Originations 2013” table, JPMC originated a total of 348 home purchase loans in 2013, giving it 4% of the Rochester MSA market, and putting it in 4th place behind CNB, M&T, and FNFG.

Despite the same or higher shares of the home purchase lending market in the various different communities (between 4-6%), JPMC did not rise above its 4th place ranking in any of the other areas. This is lower than its 2nd place depository market share rank.

JPMorgan Chase’s Small Business Lending

In 2013, JPMC (JPMorgan Chase Bank and Chase Bank combined) originated 1,316 small business loans in the Rochester MSA totaling \$38.8 million (see table below). While not reflected in the table, this is a decline of 37% in the number of loans and 16% in the lending volume from 2011.

JPMC made fewer loans to businesses in the city of Rochester in 2013 (624 loans totaling \$16.6 million) than in 2011 (873 loans totaling \$20 million), declines of 29% in loans and 17% in volume.

While the number of loans to businesses in LMI tracts declined by 17% between 2011 (266 loans) and 2013 (220 loans), JPMC’s LMI lending volume increased from \$6.1 million in 2011 to \$7.3 million in 2013, an increase of 20%.

JPMC's minimal reported lending to businesses with gross annual revenues under \$1 million (GAR<\$1 million) declined from 34 loans totaling \$3 million in 2011 to 8 loans totaling \$1.7 million in 2013, declines of 76% and 42% respectively. According to JPMC, the bank does not collect business revenue information on its credit card lending, most of which is through Chase Bank and to these smaller businesses.

The number of loans to businesses in LMI tracts or with GAR<\$1 million declined 23%, from 294 loans in 2011 to 226 loans in 2013, while the lending volume increased by 3%, from \$8.6 million to \$8.9 million.

JPMorgan Chase CRA Small Business Lending in the Rochester MSA, 2011-2013						
Loans to businesses	2011		2012		2013	
	# Loans	\$ Volume (\$000)	# Loans	\$ Volume (\$000)	# Loans	\$ Volume (\$000)
In Rochester MSA	2,073	\$ 46,319	1,725	\$ 43,244	1,316	\$ 38,808
In City of Rochester	873	\$ 19,963	790	\$ 20,157	624	\$ 16,562
In LMI Tracts MSA	266	\$ 6,070	256	\$ 7,918	220	\$ 7,296
With GAR<\$1 Million MSA	34	\$ 3,011	29	\$ 3,494	8	\$ 1,736
In LMI Tracts or w/ GAR<\$1 Million	294	\$ 8,608	281	\$ 11,267	226	\$ 8,879
% of MSA loans to businesses...	2011		2012		2013	
	# Loans	\$ Volume (\$000)	# Loans	\$ Volume (\$000)	# Loans	\$ Volume (\$000)
In City of Rochester	42.1%	43.1%	45.8%	46.6%	47.4%	42.7%
In LMI Tracts MSA	12.8%	13.1%	14.8%	18.3%	16.7%	18.8%
With GAR<\$1 Million MSA	1.6%	6.5%	1.7%	8.1%	0.6%	4.5%
In LMI Tracts or w/ GAR<\$1 Million	14.2%	18.6%	16.3%	26.1%	17.2%	22.9%

Source: Data provided by JPMC. Loans in LMI tracts or to businesses with GAR<\$1 million calculated by Empire Justice Center (unduplicated).
 Prepared by: Empire Justice Center, www.empirejustice.org

As seen in our branch closure letter dated May 19th, in 2014, JPMC made 1,784 small business loans in the Rochester MSA totaling \$37.6 million. So, while the number of loans recovered somewhat, the dollar volume of small business lending continued to decline. With respect to lending to businesses in LMI tracts, the number of loans continued to decline in 2014 to 198 loans, while the dollar volume of lending increased to \$8.6 million.

Community Development Opportunities

In addition to the consumer credit needs described above, here we describe many of the community development opportunities in Rochester. **We thank JPMC for the relationships it does have with many Rochester not-for-profits that work with low and moderate income communities and families, including those we know about with our GRCRC coalition members.**

HOME Rochester is an award-winning program converting vacant single-family houses into fully renovated for-sale homes. Throughout the City of Rochester, over 680 houses have been purchased by the **Rochester Housing Development Fund Corporation** and sold to eligible first-time homebuyers after renovation. HOME Rochester was established to treat the large

number of foreclosures experienced in Rochester in the late 1990s. For more than 15 years, the program has been housed in the Rochester Housing Development Fund Corporation (RHDFC) and administered by the **Greater Rochester Housing Partnership (GRHP)**.

HOME Rochester is **financed through a unique consortium of for-profit and non-profit lenders**. Under the leadership of JPMorgan Chase, a total of \$140 million has been made available to the RHDFC for purchasing and renovating single-family homes. The current \$16,000,000 participation loan consists of lenders with investments ranging from \$500,000 to \$3,000,000. The loan is collateralized by a loss reserve (funded by the City of Rochester) and an interest reserve (funded by GRHP). There is a working capital fund of \$750,000 that allows for day to day transactions and acquisitions. The working capital is provided by GRHP and is replenished on a monthly basis by draws from the participation loan. City funds are structured as first-in and last-out. This unique structure allows financing to take place without mortgages on the HOME Rochester inventory. This is a critical piece of financing for HOME Rochester.

GRCRC urges JPMC to **make available its REOs at a discounted rate** to the RHDFC for rehab and sale through HOME Rochester or to the **Rochester Land Bank Corporation**, run by the City of Rochester. This will help reduce the negative impact of foreclosures on struggling neighborhoods, and is another way to get CRA credit.

Equity to affordable housing developments through the federal **Low Income Housing Tax Credit Program** is a critical need. **Enterprise Community Investments** is the syndication arm of **Enterprise Community Partners**, a national non-profit organization whose mission is to help our affordable housing development partners create communities of opportunity connected to affordable housing, access to jobs and social supports, and a strong commitment to the environment and civic participation. Central to its mission is Enterprise's fundamental commitment to give people living in poverty an opportunity to move up and out. The Low Income Housing Tax Credit (LIHTC) has been the financing vehicle to help achieve the goal and end housing insecurity for those households who pay more than 50% of their income for rent. While not necessarily considered a “hot” market, these upstate LIHTC deals are still good investments that meet a critical need in our communities.

The biggest gap in **affordable multi-family housing finance** right now is term loans (at least a 15 year term – 30 years is better) that work in conjunction with projects that are funded with low income housing tax credits. Providing subsidies or grants is another way to support construction of affordable housing.

The **Finger Lakes Regional Economic Development Council (FLREDC)** was recently awarded \$500 million from the State of New York, an intensive investment in community development. One component will specifically **address poverty and infrastructure rehab** in

the downtowns throughout the Finger Lakes region, including Rochester. The FLREDC needs private financing to leverage these state dollars, including the Rochester Regional Fund.

Consumer Credit Counseling Service of Rochester (CCCS of Rochester) is a leading non-profit provider of financial education, credit counseling and debt repayment plans serving the nine-county Greater Rochester Area since 1970. Nearly 80% of the consumers who utilize CCCS's services have incomes below the LMI threshold for its metro service area. Among the primary financial goals of its clients, credit worthiness continues to rise to the top. Through education and timely interventions, CCCS of Rochester helps roughly 11,000 clients each year become well positioned for responsible borrowing. Its services include budget and credit counseling, foreclosure prevention counseling, first time homebuyer counseling and education, student loan counseling, bankruptcy counseling, representative payee services, and targeted financial education. CCCS of Rochester has benefited from the support provided by JPMC.

PathStone Corporation, which includes **The Housing Council at PathStone**, works with LMI borrowers who need affordable mortgage products that can be used in conjunction with grant programs. Mortgage products need to be targeted to serve households with credit scores as low as 580.

Funds to support homebuyer counseling are vital and well-utilized by Rochester's counseling programs.

Neighborhood Housing Services of Rochester, Inc. (NHSR), dba NeighborWorks® Rochester (NWR) is designated as a Community Development Financial Institution (CDFI). This designation allows the organization to provide financial assistance in the way of affordable-interest rate loans to those homeowners who are unable to access funds through the typical financial institutions. These homeowners are "unbankable" for a variety of reasons, such as no equity, poor credit or credit score, etc.

NeighborWorks® Rochester educates more than 300 potential first-time homebuyers annually. It also offers **Equity Builder**, a tandem loan product that is another tool for creating new homeowners. It should be noted that as a CDFI, NeighborWorks® Rochester is exempt from some of the provisions in Dodd Frank. Because of this, CDFIs can provide more flexible underwriting, which allows them to reach harder to serve CRA markets. Lending institutions can provide CDFIs with **Program Related Investments (PRI)** to lend to this segment of the first-time homebuyer market. They can then purchase these mortgages back for CRA credit.

In addition, NeighborWorks® Rochester provides **second position rehab loans** to low-moderate income homeowners. PRIs that support this type of lending impact both LMI homeowners and LMI census tracts.

Through its **Healthy Blocks Program**, NeighborWorks® Rochester targets transitional weak-market neighborhoods before they reach the tipping point of 20% poverty. HUD designates a poverty census tract as one that has reached 20% poverty. There are few examples nationally of poverty tracts recovering once they reach this tipping point. NeighborWorks® Rochester's current Healthy Blocks neighborhood has a 17% poverty rate and is next to a neighborhood that has already tipped (38% poverty). Programs like Healthy Blocks that seek to strengthen transitional neighborhoods through homeownership opportunities, increased resident engagement, improved physical conditions and enhanced neighborhood image.

C.A.S.H. (Creating Assets, Savings and Hope) is a community coalition led by Empire Justice Center and the United Way of Greater Rochester that helps low-income workers make the most of their money and build stronger financial futures. C.A.S.H. improves the financial well-being of over 15,000 working families by:

- Offering **free income tax preparation** to help eligible families take advantage of the Earned Income Tax Credit
- Offering free **one-on-one financial coaching and education**
- **Maximizing financial assets** through matched savings accounts, alternatives to predatory lending practices, credit repair, and asset building strategies.

In addition, area banks and credit unions to support C.A.S.H. in two other ways:

- Offering affordable savings and checking accounts to C.A.S.H. clients, and consider working with “CHEX” listed clients at least with savings accounts; and
- Actively recruiting C.A.S.H. volunteers from their employee base.

GRCRC thanks JPMC for its support of C.A.S.H. and C.A.S.H. Coach during the CRA exam period and in 2015.

Genesee Co-op FCU needs long-term subordinated debt for use as secondary capital for a minimum term of nine years at a rate no greater than 2%, to match what the Department of Treasury has provided to the community development credit union. The subordinated debt will be used to augment the net worth of Genesee Co-op FCU, which will permit it to grow as it meets the credit needs of LMI residents of Rochester by providing first opportunities and second chances for affordable credit and financial services.

The **M.K. Gandhi Institute for Nonviolence** is a nonprofit located in a low-income neighborhood in the city of Rochester. The institute educates about violence, its many forms and

root causes. It supports grassroots, community, university and world initiatives that address the systems, mentalities and actions that breed violence.

In addition to its **daily school-based programming in the Rochester City School District** to decrease suspensions and facilitate healthy school climates, the institute also serves as an incubator for projects to address the underlying causes of violence, such as high youth unemployment and extreme poverty.

Sector 4 CDC initiated the **Brooks Landing** revitalization, which at this point exceeds \$80 million in investments. Lending needs to continue for **construction and renovation of commercial and mixed-use buildings** in that area. Within the next 5 years similar expansions are expected in the Vacuum Oil Brownfield Opportunity Area and the Bulls Head Brownfield Opportunity Area.

In the northeast area of Rochester, there are neighborhood based programs for **housing, education and wealth creation** at **NorthEast Area Development (NEAD)** and **Group 14621**. These programs include the Freedom School and the Freedom Markets. These programs can serve a critical need in the event of the closing of the JPMC branch at Portland/Clifford.

The **Regional Center for Independent Living (RCIL)**, works with consumers **with disabilities** ensuring that their financial needs are met

Another philanthropic and marketing opportunity is City of Rochester's annual event **Celebrate City Living**, which occurs in the spring. Area banks participate by being financial sponsors.

Empire Justice Center supports **CRA advocacy** in the Rochester MSA and other New York communities by analyzing mortgage lending data to assess whether LMI families and communities and communities of color have access to affordable mortgage credit. In 2015, Empire Justice published two mortgage lending reports examining lending on Long Island and in the Rochester MSA (see footnote 1). The organization released the reports via community forums in each of these localities, sharing findings and facilitating discussions. GRCRC is grateful to JPMC for its financial support of this work.

We thank JPMC for the support provided to local not-for-profits including GRHP, Neighborworks® Rochester, CCCR and Empire Justice Center. We will share details about some of the community credit needs described above at our meeting in June. We urge JPMC to seriously consider these additional opportunities.

Conclusion

As one of the largest depositories in the Rochester MSA, JPMC can be a leader in meeting the unmet credit needs of the Rochester community, with a special focus on the LMI and majority non-white neighborhoods in the city of Rochester. GRCRC urges the OCC to take the following into consideration as it wraps up its CRA exam of JPMC:

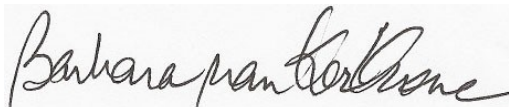
- Despite being the second largest depository in the Rochester NY MSA, JPMC does not have staff with decision making power located in, and familiar with, Rochester and mid-size cities like it.
- The lack of consumer credit products offered by JPMC to help un- and underbanked consumers.
- The decline in JPMC's CRA-related investments in the community.
- JPMC's mortgage lending market share of 3-4% and its 4th place rank, which are significantly lower than its 13.7% depository market share and 2nd place depository rank.
- The decline in JPMC's small business lending and LMI small business lending.
- Our recommendation, shared by NYC colleagues, to give JPMC less than a satisfactory rating.

We are already planning a meeting with JPMC to discuss community credit needs and innovative programs that would benefit both JPMC and the LMI population of Rochester. In the meantime, the CRA evaluation should accurately reflect the bank has been serving our communities, particularly low and moderate income families and communities.

Yours truly,



Ruhi Maker, Esq.
Senior Attorney
Empire Justice Center



Barbara Van Kerkhove, Ph.D.
Researcher/Policy Analyst
Empire Justice Center

Cc: Assemblymember David Gantt
Mayor Lovely Warren/Jeremy Cooney
Monroe County Legislator Vince Felder
City Councilmember Michael Patterson
Senator Charles Schumer
Congresswoman Louise Slaughter
Bonita Irving, OCC
Andrea Rosen, OCC

Appendix I: JPMorgan Chase's Total Lending and Home Purchase Lending Market Share and Distribution in Different Rochester NY MSA Communities, 2011-2103

JPMorgan Chase Total Lending Marketshare and Distribution						
(1st lien home purchase loans on owner-occupied, 1-4 family, site built units)						
	2011	2012	2013	2014	2011-2013	2011-2013
	AFI	AFI	AFI	AFI	# Change	% Change
MSA	16,291	19,407	17,949	13,244	1,658	10%
City	1,320	1,555	1,497	1,250	177	13%
BI/His HH MSA	822	956	979	852	157	19%
LM HH MSA	5,568	6,222	5,857	4,784	289	5%
LM CT MSA	1,346	1,787	1,822	1,211	476	35%
Minority CT	386	545	579	507	193	50%
	2011	2012	2013	2014	2011-2013	2011-2013
	Chase	Chase	Chase	Chase	# Change	% Change
MSA	572	687	628	213	56	10%
City	52	93	67	29	15	29%
BI/His HH MSA	27	55	52	18	25	93%
LM HH MSA	251	324	273	67	22	9%
LM CT MSA	62	101	91	24	29	47%
Minority CT	26	42	39	13	13	50%
Marketshare	2011	2012	2013	2014	2011-2013	2011-2013
	Chase	Chase	Chase	Chase	# Change	% Change
MSA	3.5%	3.5%	3.5%	1.6%	0.0%	0%
City	3.9%	6.0%	4.5%	2.3%	0.5%	14%
BI/His HH MSA	3.3%	5.8%	5.3%	2.1%	2.0%	62%
LM HH MSA	4.5%	5.2%	4.7%	1.4%	0.2%	3%
LM CT MSA	4.6%	5.7%	5.0%	2.0%	0.4%	8%
Minority CT	6.7%	7.7%	6.7%	2.6%	0.0%	0%
% of MSA loans in...	2011	2012	2013	2014	2011-2013	2011-2013
	AFI	AFI	AFI	AFI	# Change	% Change
City	8.1%	8.0%	8.3%	9.4%	0.2%	3%
BI/His HH MSA	5.0%	4.9%	5.5%	6.4%	0.4%	8%
LM HH MSA	34.2%	32.1%	32.6%	36.1%	-1.5%	-5%
LM CT MSA	8.3%	9.2%	10.2%	9.1%	1.9%	23%
Minority CT	2.4%	2.8%	3.2%	3.8%	0.9%	36%
% of MSA loans in...	2011	2012	2013	2014	2011-2013	2011-2013
	Chase	Chase	Chase	Chase	# Change	% Change
City	9.1%	13.5%	10.7%	13.6%	1.6%	17%
BI/His HH MSA	4.7%	8.0%	8.3%	8.5%	3.6%	75%
LM HH MSA	43.9%	47.2%	43.5%	31.5%	-0.4%	-1%
LM CT MSA	10.8%	14.7%	14.5%	11.3%	3.7%	34%
Minority CT	4.5%	6.1%	6.2%	6.1%	1.7%	37%
Prepared by Empire Justice Center, 585-454-4060						

JPMorgan Chase Home Purchase Lending Marketshare and Distribution						
(1st lien home purchase loans on owner-occupied, 1-4 family, site built units)						
	2011	2012	2013	2014	2011-2013	2011-2013
	AFI	AFI	AFI	AFI	# Change	% Change
MSA	7,674	8,357	9,138	9,101	1,464	19%
City	810	855	905	939	95	12%
BI/His HH MSA	505	569	613	634	108	21%
LM HH MSA	3,249	3,428	3,466	3,494	217	7%
LM CT MSA	786	949	1,027	849	241	31%
Minority CT	223	324	359	373	136	61%
	2011	2012	2013	2014	2011-2013	2011-2013
	Chase	Chase	Chase	Chase	# Change	% Change
MSA	293	348	348	130	55	19%
City	23	40	35	19	12	52%
BI/His HH MSA	11	27	33	14	22	200%
LM HH MSA	172	197	160	48	-12	-7%
LM CT MSA	41	51	55	18	14	34%
Minority CT	13	19	21	10	8	62%
Marketshare	2011	2012	2013	2014	2011-2013	2011-2013
	Chase	Chase	Chase	Chase	# Change	% Change
MSA	3.8%	4.2%	3.8%	1.4%	0.0%	0%
City	2.8%	4.7%	3.9%	2.0%	1.0%	36%
BI/His HH MSA	2.2%	4.7%	5.4%	2.2%	3.2%	147%
LM HH MSA	5.3%	5.7%	4.6%	1.4%	-0.7%	-13%
LM CT MSA	5.2%	5.4%	5.4%	2.1%	0.1%	3%
Minority CT	5.8%	5.9%	5.8%	2.7%	0.0%	0%
% of MSA loans in...	2011	2012	2013	2014	2011-2013	2011-2013
	AFI	AFI	AFI	AFI	# Change	% Change
City	10.6%	10.2%	9.9%	10.3%	-0.7%	-6%
BI/His HH MSA	6.6%	6.8%	6.7%	7.0%	0.1%	2%
LM HH MSA	42.3%	41.0%	37.9%	38.4%	-4.4%	-10%
LM CT MSA	10.2%	11.4%	11.2%	9.3%	1.0%	10%
Minority CT	2.9%	3.9%	3.9%	4.1%	1.0%	35%
% of MSA loans in...	2011	2012	2013	2014	2011-2013	2011-2013
	Chase	Chase	Chase	Chase	# Change	% Change
City	7.8%	11.5%	10.1%	14.6%	2.2%	28%
BI/His HH MSA	3.8%	7.8%	9.5%	10.8%	5.7%	153%
LM HH MSA	58.7%	56.6%	46.0%	36.9%	-12.7%	-22%
LM CT MSA	14.0%	14.7%	15.8%	13.8%	1.8%	13%
Minority CT	4.4%	5.5%	6.0%	7.7%	1.6%	36%
Prepared by Empire Justice Center, 585-454-4060						

Appendix II: Top 8 Banks Mortgage Lending Tables, 2011 – 2014

Top 8 Banks Total Mortgage Originations 2011											
Rochester, NY MSA											
(1st lien loans on owner-occupied, 1-4 family, site built units)											
Annual HMDA data	AFI	BOA	CNB	Citizens	Five Star	HSBC	JPMC	Key	M&T	Top 8	OFI
MSA	16,291	611	1,184	342	273	894	572	108	803	4,787	11,504
City	1,320	73	111	59	2	124	52	11	112	544	776
Black/Hispanic HH MSA	822	33	31	54	6	110	27	2	98	361	461
Low-Mod HH MSA	5,568	234	304	154	111	436	251	38	347	1,875	3,693
Low-Mod Income CT	1,346	63	80	47	46	127	62	9	107	541	805
Minority CT	386	25	18	27	2	48	26	3	37	186	200
MARKETSHARE											
		BOA	CNB	Citizens	Five Star	HSBC	JPMC	Key	M&T	Top 8	OFI
MSA		4%	7%	2%	2%	5%	4%	1%	5%	29%	71%
City		6%	8%	4%	0%	9%	4%	1%	8%	41%	59%
Black/Hispanic HH MSA		4%	4%	7%	1%	13%	3%	0%	12%	44%	56%
Low-Mod HH MSA		4%	5%	3%	2%	8%	5%	1%	6%	34%	66%
Low-Mod Income CT		5%	6%	3%	3%	9%	5%	1%	8%	40%	60%
Minority CT		6%	5%	7%	1%	12%	7%	1%	10%	48%	52%
Loans as %											
of MSA TOTAL IN:	AFI	BOA	CNB	Citizens	Five Star	HSBC	JPMC	Key	M&T	Top 8	OFI
City	8%	12%	9%	17%	1%	14%	9%	10%	14%	11%	7%
Black/Hispanic HH MSA	5%	5%	3%	16%	2%	12%	5%	2%	12%	8%	4%
Low-Mod HH MSA	34%	38%	26%	45%	41%	49%	44%	35%	43%	39%	32%
Low-Mod Income CT	8%	10%	7%	14%	17%	14%	11%	8%	13%	11%	7%
Minority CT	2%	4%	2%	8%	1%	5%	5%	3%	5%	4%	2%
Prepared by: Empire Justice Center, 585-454-4060											

Top 8 Banks Dollar Amount HMDA Lending 2011

Rochester, NY MSA

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

Annual HMDA data	AFI	BOA	CNB	Citizens	Five Star	HSBC	JPMC	Key	M&T	Top 8	OFI
MSA	\$2,107,930	\$82,007	\$185,684	\$37,957	\$26,057	\$95,269	\$65,387	\$12,909	\$101,077	\$606,347	\$1,501,583
City	\$121,275	\$7,014	\$13,508	\$4,442	\$67	\$9,207	\$4,095	\$1,142	\$9,106	\$48,581	\$72,694
Black/Hispanic HH MSA	\$84,014	\$3,408	\$3,689	\$4,600	\$258	\$9,282	\$2,312	\$214	\$8,548	\$32,311	\$51,703
Low-Mod HH MSA	\$499,586	\$21,468	\$29,642	\$12,192	\$7,870	\$36,299	\$22,303	\$3,272	\$30,698	\$163,744	\$335,842
Low-Mod Income CT	\$108,913	\$5,485	\$9,170	\$3,164	\$3,180	\$8,954	\$4,951	\$759	\$7,570	\$43,233	\$65,680
Minority CT	\$27,384	\$2,213	\$2,182	\$1,566	\$67	\$3,023	\$1,791	\$177	\$2,235	\$13,254	\$14,130
MARKETSHARE											
		BOA	CNB	Citizens	Five Star	HSBC	JPMC	Key	M&T	Top 8	OFI
MSA		4%	9%	2%	1%	5%	3%	1%	5%	29%	71%
City		6%	11%	4%	0%	8%	3%	1%	8%	40%	60%
Black/Hispanic HH MSA		4%	4%	5%	0%	11%	3%	0%	10%	38%	62%
Low-Mod HH MSA		4%	6%	2%	2%	7%	4%	1%	6%	33%	67%
Low-Mod Income CT		5%	8%	3%	3%	8%	5%	1%	7%	40%	60%
Minority CT		8%	8%	6%	0%	11%	7%	1%	8%	48%	52%
Loans as %											
of MSA TOTAL IN:	AFI	BOA	CNB	Citizens	Five Star	HSBC	JPMC	Key	M&T	Top 8	OFI
City	6%	9%	7%	12%	0%	10%	6%	9%	9%	8%	5%
Black/Hispanic HH MSA	4%	4%	2%	12%	1%	10%	4%	2%	8%	5%	3%
Low-Mod HH MSA	24%	26%	16%	32%	30%	38%	34%	25%	30%	27%	22%
Low-Mod Income CT	5%	7%	5%	8%	12%	9%	8%	6%	7%	7%	4%
Minority CT	1%	3%	1%	4%	0%	3%	3%	1%	2%	2%	1%

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

Top 8 Banks Home Purchase Originations 2011

Rochester, NY MSA

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

Annual HMDA data	AFI	BOA	CNB	Citizens	Five Star	HSBC	JPMC	Key	M&T	Top 8	OFI
MSA	7,674	330	566	129	60	423	293	38	435	2,274	5,400
City	810	52	77	39	0	88	23	6	87	372	438
Black/Hispanic HH MSA	505	24	20	39	1	87	11	2	75	259	246
Low-Mod HH MSA	3,249	152	195	80	30	258	172	15	245	1,147	2,102
Low-Mod Income CT	786	46	56	32	6	91	41	3	78	353	433
Minority CT	223	20	14	19	0	37	13	1	29	133	90
MARKETSHARE											
		BOA	CNB	Citizens	Five Star	HSBC	JPMC	Key	M&T	Top 8	OFI
MSA		4%	7%	2%	1%	6%	4%	0%	6%	30%	70%
City		6%	10%	5%	0%	11%	3%	1%	11%	46%	54%
Black/Hispanic HH MSA		5%	4%	8%	0%	17%	2%	0%	15%	51%	49%
Low-Mod HH MSA		5%	6%	2%	1%	8%	5%	0%	8%	35%	65%
Low-Mod Income CT		6%	7%	4%	1%	12%	5%	0%	10%	45%	55%
Minority CT		9%	6%	9%	0%	17%	6%	0%	13%	60%	40%
Loans as %											
of MSA TOTAL IN:	AFI	BOA	CNB	Citizens	Five Star	HSBC	JPMC	Key	M&T	Top 8	OFI
City	11%	16%	14%	30%	0%	21%	8%	16%	20%	16%	8%
Black/Hispanic HH MSA	7%	7%	4%	30%	2%	21%	4%	5%	17%	11%	5%
Low-Mod HH MSA	42%	46%	34%	62%	50%	61%	59%	39%	56%	50%	39%
Low-Mod Income CT	10%	14%	10%	25%	10%	22%	14%	8%	18%	16%	8%
Minority CT	3%	6%	2%	15%	0%	9%	4%	3%	7%	6%	2%

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

Top 8 Banks Total Mortgage Originations 2012

Rochester, NY MSA

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

Annual HMDA data	AFI	BOA	CNB	Citizens	FNFG	Five Star	HSBC	JPMC	M&T	Top 8	OFI
MSA	19,407	234	1,737	355	709	347	325	687	1,098	5,492	13,915
City	1,555	17	137	64	60	4	65	93	141	581	974
Black/Hispanic HH MSA	956	10	40	60	36	9	45	55	94	349	607
Low-Mod HH MSA	6,222	73	432	160	257	130	151	324	420	1,947	4,275
Low-Mod Income CT	1,787	18	110	72	73	20	70	101	133	597	1,190
Minority CT	545	5	35	45	16	1	34	42	63	241	304
MARKETSHARE											
		BOA	CNB	Citizens	FNFG	Five Star	HSBC	JPMC	M&T	Top 8	OFI
MSA		1%	9%	2%	4%	2%	2%	4%	6%	28%	72%
City		1%	9%	4%	4%	0%	4%	6%	9%	37%	63%
Black/Hispanic HH MSA		1%	4%	6%	4%	1%	5%	6%	10%	37%	63%
Low-Mod HH MSA		1%	7%	3%	4%	2%	2%	5%	7%	31%	69%
Low-Mod Income CT		1%	6%	4%	4%	1%	4%	6%	7%	33%	67%
Minority CT		1%	6%	8%	3%	0%	6%	8%	12%	44%	56%
Loans as %											
of MSA TOTAL IN:	AFI	BOA	CNB	Citizens	FNFG	Five Star	HSBC	JPMC	M&T	Top 8	OFI
City	8%	7%	8%	18%	8%	1%	20%	14%	13%	11%	7%
Black/Hispanic HH MSA	5%	4%	2%	17%	5%	3%	14%	8%	9%	6%	4%
Low-Mod HH MSA	32%	31%	25%	45%	36%	37%	46%	47%	38%	35%	31%
Low-Mod Income CT	9%	8%	6%	20%	10%	6%	22%	15%	12%	11%	9%
Minority CT	3%	2%	2%	13%	2%	0%	10%	6%	6%	4%	2%
Prepared by: Empire Justice Center, 585-454-4060											

Top 8 Banks Dollar Amount HMDA Lending 2012

Rochester, NY MSA

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

Annual HMDA data	AFI	BOA	CNB	Citizens	FNFG	Five Star	HSBC	JPMC	M&T	Top 8	OFI
MSA	\$2,566,091	\$37,376	\$282,684	\$36,677	\$90,818	\$31,214	\$32,588	\$78,737	\$142,212	\$732,306	\$1,833,785
City	\$152,719	\$2,375	\$17,162	\$4,464	\$5,581	\$277	\$4,484	\$7,865	\$13,113	\$55,321	\$97,398
Black/Hispanic HH MSA	\$105,358	\$1,429	\$5,746	\$4,739	\$3,185	\$612	\$3,862	\$4,726	\$9,687	\$33,986	\$71,372
Low-Mod HH MSA	\$567,103	\$6,627	\$42,915	\$13,144	\$22,762	\$9,030	\$11,918	\$27,524	\$39,865	\$173,785	\$393,318
Low-Mod Income CT	\$157,557	\$1,333	\$12,197	\$5,116	\$6,399	\$1,589	\$4,779	\$7,316	\$11,603	\$50,332	\$107,225
Minority CT	\$39,210	\$392	\$3,544	\$2,867	\$1,090	\$35	\$1,957	\$2,341	\$4,508	\$16,734	\$22,476
MARKETSHARE											
		BOA	CNB	Citizens	FNFG	Five Star	HSBC	JPMC	M&T	Top 8	OFI
MSA		1%	11%	1%	4%	1%	1%	3%	6%	29%	71%
City		2%	11%	3%	4%	0%	3%	5%	9%	36%	64%
Black/Hispanic HH MSA		1%	5%	4%	3%	1%	4%	4%	9%	32%	68%
Low-Mod HH MSA		1%	8%	2%	4%	2%	2%	5%	7%	31%	69%
Low-Mod Income CT		1%	8%	3%	4%	1%	3%	5%	7%	32%	68%
Minority CT		1%	9%	7%	3%	0%	5%	6%	11%	43%	57%
Loans as %											
of MSA TOTAL IN:	AFI	BOA	CNB	Citizens	FNFG	Five Star	HSBC	JPMC	M&T	Top 8	OFI
City	6%	6%	6%	12%	6%	1%	14%	10%	9%	8%	5%
Black/Hispanic HH MSA	4%	4%	2%	13%	4%	2%	12%	6%	7%	5%	4%
Low-Mod HH MSA	22%	18%	15%	36%	25%	29%	37%	35%	28%	24%	21%
Low-Mod Income CT	6%	4%	4%	14%	7%	5%	15%	9%	8%	7%	6%
Minority CT	2%	1%	1%	8%	1%	0%	6%	3%	3%	2%	1%

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

Top 8 Banks Home Purchase Originations 2012

Rochester, NY MSA

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

Annual HMDA data	AFI	BOA	CNB	Citizens	FNFG	Five Star	HSBC	JPMC	M&T	Top 8	OFI
MSA	8,357	98	745	146	397	52	155	348	606	2,547	5,810
City	855	11	94	48	46	2	41	40	104	386	469
Black/Hispanic HH MSA	569	6	29	52	30	2	39	27	81	266	303
Low-Mod HH MSA	3,428	40	250	96	183	20	103	197	302	1,191	2,237
Low-Mod Income CT	949	9	83	53	52	4	48	51	97	397	552
Minority CT	324	3	31	37	15	0	30	19	53	188	136
MARKETSHARE											
		BOA	CNB	Citizens	FNFG	Five Star	HSBC	JPMC	M&T	Top 8	OFI
MSA		1%	9%	2%	5%	1%	2%	4%	7%	30%	70%
City		1%	11%	6%	5%	0%	5%	5%	12%	45%	55%
Black/Hispanic HH MSA		1%	5%	9%	5%	0%	7%	5%	14%	47%	53%
Low-Mod HH MSA		1%	7%	3%	5%	1%	3%	6%	9%	35%	65%
Low-Mod Income CT		1%	9%	6%	5%	0%	5%	5%	10%	42%	58%
Minority CT		1%	10%	11%	5%	0%	9%	6%	16%	58%	42%
Loans as %											
of MSA TOTAL IN:	AFI	BOA	CNB	Citizens	FNFG	Five Star	HSBC	JPMC	M&T	Top 8	OFI
City	10%	11%	13%	33%	12%	4%	26%	11%	17%	15%	8%
Black/Hispanic HH MSA	7%	6%	4%	36%	8%	4%	25%	8%	13%	10%	5%
Low-Mod HH MSA	41%	41%	34%	66%	46%	38%	66%	57%	50%	47%	39%
Low-Mod Income CT	11%	9%	11%	36%	13%	8%	31%	15%	16%	16%	10%
Minority CT	4%	3%	4%	25%	4%	0%	19%	5%	9%	7%	2%

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

Top 8 Banks Total Mortgage Originations 2013

Rochester, NY MSA

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

Annual HMDA data	AFI	BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
MSA	17,949	278	1,360	383	669	390	628	435	976	5,119	12,830
City	1,497	18	139	66	91	6	67	26	143	556	941
Black/Hispanic HH MSA	979	17	36	60	67	3	52	25	118	378	601
Low-Mod HH MSA	5,857	71	341	152	296	126	273	110	421	1,790	4,067
Low-Mod Income CT	1,822	21	105	71	90	48	91	41	135	602	1,220
Minority CT	579	9	44	47	45	3	39	7	67	261	318
MARKETSHARE											
		BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
MSA		2%	8%	2%	4%	2%	3%	2%	5%	29%	71%
City		1%	9%	4%	6%	0%	4%	2%	10%	37%	63%
Black/Hispanic HH MSA		2%	4%	6%	7%	0%	5%	3%	12%	39%	61%
Low-Mod HH MSA		1%	6%	3%	5%	2%	5%	2%	7%	31%	69%
Low-Mod Income CT		1%	6%	4%	5%	3%	5%	2%	7%	33%	67%
Minority CT		2%	8%	8%	8%	1%	7%	1%	12%	45%	55%
Loans as %											
of MSA TOTAL IN:	AFI	BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
City	8%	6%	10%	17%	14%	2%	11%	6%	15%	11%	7%
Black/Hispanic HH MSA	5%	6%	3%	16%	10%	1%	8%	6%	12%	7%	5%
Low-Mod HH MSA	33%	26%	25%	40%	44%	32%	43%	25%	43%	35%	32%
Low-Mod Income CT	10%	8%	8%	19%	13%	12%	14%	9%	14%	12%	10%
Minority CT	3%	3%	3%	12%	7%	1%	6%	2%	7%	5%	2%
Prepared by: Empire Justice Center, 585-454-4060											

Top 8 Banks Dollar Amount HMDA Lending 2013

Rochester, NY MSA

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

Annual HMDA data	AFI	BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
MSA	\$2,360,876	\$43,951	\$220,332	\$40,295	\$81,974	\$34,483	\$74,860	\$49,344	\$125,461	\$670,700	\$1,690,176
City	\$147,842	\$1,538	\$17,902	\$4,007	\$7,507	\$501	\$5,480	\$1,908	\$13,846	\$52,689	\$95,153
Black/Hispanic HH MSA	\$105,722	\$1,649	\$5,141	\$4,882	\$5,684	\$254	\$4,321	\$2,544	\$10,861	\$35,336	\$70,386
Low-Mod HH MSA	\$522,494	\$6,003	\$32,713	\$10,903	\$25,990	\$8,201	\$23,180	\$8,896	\$37,639	\$153,525	\$368,969
Low-Mod Income CT	\$157,106	\$1,706	\$10,994	\$4,366	\$7,339	\$3,061	\$7,180	\$2,904	\$11,271	\$48,821	\$108,285
Minority CT	\$42,548	\$617	\$4,424	\$2,617	\$2,784	\$124	\$2,513	\$393	\$4,616	\$18,088	\$24,460
MARKETSHARE											
		BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
MSA		2%	9%	2%	3%	1%	3%	2%	5%	28%	72%
City		1%	12%	3%	5%	0%	4%	1%	9%	36%	64%
Black/Hispanic HH MSA		2%	5%	5%	5%	0%	4%	2%	10%	33%	67%
Low-Mod HH MSA		1%	6%	2%	5%	2%	4%	2%	7%	29%	71%
Low-Mod Income CT		1%	7%	3%	5%	2%	5%	2%	7%	31%	69%
Minority CT		1%	10%	6%	7%	0%	6%	1%	11%	43%	57%
Loans as %											
of MSA TOTAL IN:	AFI	BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
City	6%	3%	8%	10%	9%	1%	7%	4%	11%	8%	6%
Black/Hispanic HH MSA	4%	4%	2%	12%	7%	1%	6%	5%	9%	5%	4%
Low-Mod HH MSA	22%	14%	15%	27%	32%	24%	31%	18%	30%	23%	22%
Low-Mod Income CT	7%	4%	5%	11%	9%	9%	10%	6%	9%	7%	6%
Minority CT	2%	1%	2%	6%	3%	0%	3%	1%	4%	3%	1%

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

Top 8 Banks Home Purchase Originations 2013

Rochester, NY MSA

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

Annual HMDA data	AFI	BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
MSA	9,138	159	728	131	433	63	348	55	687	2,604	6,534
City	905	13	97	40	66	1	35	7	115	374	531
Black/Hispanic HH MSA	613	14	23	45	56	0	33	3	97	271	342
Low-Mod HH MSA	3,466	46	223	74	222	17	160	24	342	1,108	2,358
Low-Mod Income CT	1,027	15	76	40	66	10	55	10	107	379	648
Minority CT	359	7	32	33	34	0	21	3	59	189	170
MARKETSHARE											
		BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
MSA		2%	8%	1%	5%	1%	4%	1%	8%	28%	72%
City		1%	11%	4%	7%	0%	4%	1%	13%	41%	59%
Black/Hispanic HH MSA		2%	4%	7%	9%	0%	5%	0%	16%	44%	56%
Low-Mod HH MSA		1%	6%	2%	6%	0%	5%	1%	10%	32%	68%
Low-Mod Income CT		1%	7%	4%	6%	1%	5%	1%	10%	37%	63%
Minority CT		2%	9%	9%	9%	0%	6%	1%	16%	53%	47%
Loans as %											
of MSA TOTAL IN:	AFI	BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
City	10%	8%	13%	31%	15%	2%	10%	13%	17%	14%	8%
Black/Hispanic HH MSA	7%	9%	3%	34%	13%	0%	9%	5%	14%	10%	5%
Low-Mod HH MSA	38%	29%	31%	56%	51%	27%	46%	44%	50%	43%	36%
Low-Mod Income CT	11%	9%	10%	31%	15%	16%	16%	18%	16%	15%	10%
Minority CT	4%	4%	4%	25%	8%	0%	6%	5%	9%	7%	3%

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

Top 8 Banks Total Mortgage Originations 2014

Rochester, NY MSA

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

Annual HMDA data	AFI	BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
MSA	13,244	243	936	235	457	474	213	159	646	3,363	9,881
City	1,250	32	120	44	84	9	29	12	113	443	807
Black/Hispanic HH MSA	852	15	38	47	65	12	18	8	103	306	546
Low-Mod HH MSA	4,784	74	313	120	233	128	67	53	321	1,309	3,475
Low-Mod Income CT	1,211	21	87	46	62	44	24	14	102	400	811
Minority CT	507	20	46	29	38	5	13	7	60	218	289
MARKETSHARE											
		BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
MSA		2%	7%	2%	3%	4%	2%	1%	5%	25%	75%
City		3%	10%	4%	7%	1%	2%	1%	9%	35%	65%
Black/Hispanic HH MSA		2%	4%	6%	8%	1%	2%	1%	12%	36%	64%
Low-Mod HH MSA		2%	7%	3%	5%	3%	1%	1%	7%	27%	73%
Low-Mod Income CT		2%	7%	4%	5%	4%	2%	1%	8%	33%	67%
Minority CT		4%	9%	6%	7%	1%	3%	1%	12%	43%	57%
Loans as %											
of MSA TOTAL IN:	AFI	BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
City	9%	13%	13%	19%	18%	2%	14%	8%	17%	13%	8%
Black/Hispanic HH MSA	6%	6%	4%	20%	14%	3%	8%	5%	16%	9%	6%
Low-Mod HH MSA	36%	30%	33%	51%	51%	27%	31%	33%	50%	39%	35%
Low-Mod Income CT	9%	9%	9%	20%	14%	9%	11%	9%	16%	12%	8%
Minority CT	4%	8%	5%	12%	8%	1%	6%	4%	9%	6%	3%
Prepared by: Empire Justice Center, 585-454-4060											

Top 8 Banks Dollar Amount HMDA Lending 2014

Rochester, NY MSA

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

Annual HMDA data	AFI	BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
MSA	\$1,774,076	\$37,804	\$146,877	\$24,647	\$55,103	\$51,117	\$32,307	\$18,310	\$80,204	\$446,369	\$1,327,707
City	\$122,734	\$2,726	\$13,204	\$2,830	\$7,069	\$1,082	\$2,687	\$823	\$10,900	\$41,321	\$81,413
Black/Hispanic HH MSA	\$92,390	\$1,353	\$5,211	\$4,229	\$5,939	\$1,690	\$1,949	\$642	\$8,863	\$29,876	\$62,514
Low-Mod HH MSA	\$437,336	\$6,520	\$30,675	\$9,666	\$20,865	\$8,697	\$6,122	\$3,878	\$28,062	\$114,485	\$322,851
Low-Mod Income CT	\$100,851	\$1,431	\$9,314	\$3,154	\$4,680	\$3,052	\$2,126	\$959	\$7,899	\$32,615	\$68,236
Minority CT	\$37,568	\$1,342	\$3,915	\$1,609	\$2,574	\$419	\$966	\$383	\$4,374	\$15,582	\$21,986
MARKETSHARE											
		BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
MSA		2%	8%	1%	3%	3%	2%	1%	5%	25%	75%
City		2%	11%	2%	6%	1%	2%	1%	9%	34%	66%
Black/Hispanic HH MSA		1%	6%	5%	6%	2%	2%	1%	10%	32%	68%
Low-Mod HH MSA		1%	7%	2%	5%	2%	1%	1%	6%	26%	74%
Low-Mod Income CT		1%	9%	3%	5%	3%	2%	1%	8%	32%	68%
Minority CT		4%	10%	4%	7%	1%	3%	1%	12%	41%	59%
Loans as %											
of MSA TOTAL IN:	AFI	BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
City	7%	7%	9%	11%	13%	2%	8%	4%	14%	9%	6%
Black/Hispanic HH MSA	5%	4%	4%	17%	11%	3%	6%	4%	11%	7%	5%
Low-Mod HH MSA	25%	17%	21%	39%	38%	17%	19%	21%	35%	26%	24%
Low-Mod Income CT	6%	4%	6%	13%	8%	6%	7%	5%	10%	7%	5%
Minority CT	2%	4%	3%	7%	5%	1%	3%	2%	5%	3%	2%

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

Top 8 Banks Home Purchase Originations 2014

Rochester, NY MSA

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

Annual HMDA data	AFI	BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
MSA	9,101	187	688	135	397	88	130	58	517	2,200	6,901
City	939	23	109	38	76	3	19	4	103	375	564
Black/Hispanic HH MSA	634	13	30	39	62	2	14	3	93	256	378
Low-Mod HH MSA	3,494	58	240	79	214	24	48	24	278	965	2,529
Low-Mod Income CT	849	16	78	37	55	9	18	7	97	317	532
Minority CT	373	15	43	24	36	1	10	3	59	191	182
MARKETSHARE											
		BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
MSA		2%	8%	1%	4%	1%	1%	1%	6%	24%	76%
City		2%	12%	4%	8%	0%	2%	0%	11%	40%	60%
Black/Hispanic HH MSA		2%	5%	6%	10%	0%	2%	0%	15%	40%	60%
Low-Mod HH MSA		2%	7%	2%	6%	1%	1%	1%	8%	28%	72%
Low-Mod Income CT		2%	9%	4%	6%	1%	2%	1%	11%	37%	63%
Minority CT		4%	12%	6%	10%	0%	3%	1%	16%	51%	49%
Loans as %											
of MSA TOTAL IN:	AFI	BOA	CNB	Citizens	FNFG	Five Star	JPMC	Key	M&T	Top 8	OFI
City	10%	12%	16%	28%	19%	3%	15%	7%	20%	17%	8%
Black/Hispanic HH MSA	7%	7%	4%	29%	16%	2%	11%	5%	18%	12%	5%
Low-Mod HH MSA	38%	31%	35%	59%	54%	27%	37%	41%	54%	44%	37%
Low-Mod Income CT	9%	9%	11%	27%	14%	10%	14%	12%	19%	14%	8%
Minority CT	4%	8%	6%	18%	9%	1%	8%	5%	11%	9%	3%
Prepared by: Empire Justice Center, 585-454-4060											