

# TRIAD BUSINESS BANK

## Proposal and Comment Information

**Title:** Request for Information: Streamlining the Call Report, OP-1872

**Comment ID:** FR-2025-0074-01-C01

## Submitter Information

**Organization Name:** Triad Business Bank

**Organization Type:** Company

**Submitted Date:** 12/30/2025

## Request for Information: Streamlining the Call Report

Triad Business Bank would like to put forth for consideration an increase in the \$1 billion or more in total assets threshold for various reporting items in the Call Report. In looking back at a Call Report from the year 2000, the \$1 billion or more in total assets threshold was used to determine whether certain items would be reportable. The Call Report has changed over the past 25 years, and there are now more and different items with this threshold, but the amount of the threshold has remained unchanged while the economy has grown.

According to the FDIC Quarterly Banking Profiles, there were 542 out of 9,904 FDIC-insured institutions with assets greater than \$1 billion, or 5.47%, at year end 2000, while there were 1,049 out of 4,379, or 23.96%, at September 30, 2025. Therefore, the reporting required based on this threshold went from impacting a little over 5% of FDIC-insured institutions at year end 2000 to almost a quarter of all FDIC-insured institutions at September 30, 2025. We concur with the ABA in their attached letter to the Federal Reserve, FDIC, and OCC, dated October 23, 2025, that “thresholds that once reflected meaningful distinctions in size, complexity, or risk now capture institutions whose risk profiles do not reflect the regulatory requirements tied to the corresponding regulatory thresholds.” We support the ABA’s suggestion that the solution is “linking asset-based thresholds to nominal GDP.”

We also suggest modifying the reporting frequency for Form FFIEC 051 to require the following itemizations only in the December Call Report:

- Schedule RC-F, Item 6 (“All other assets”): Descriptions for amounts >\$100,000 and >25% of the item total.
- Schedule RC-G, Item 4 (“All other liabilities”): Descriptions for amounts >\$100,000 and >25% of the item total.

This change would align these schedules with Schedule RI-E (Items 1 and 2), which already limits the itemization of large "Other noninterest income" and "Other noninterest expense" amounts to the December report.

TABLE III-A. Full Year 2003, All FDIC-Insured Institutions

| FULL YEAR<br>(The way it is...)                        | All<br>Insured<br>Institutions | Asset Size Distribution    |                                 |                                |                              | Geographic Regions* |                  |                  |                |                |                  |
|--|--------------------------------|----------------------------|---------------------------------|--------------------------------|------------------------------|---------------------|------------------|------------------|----------------|----------------|------------------|
|  |                                | Less than<br>\$100 Million | \$100 Million<br>to \$1 Billion | \$1 Billion to<br>\$10 Billion | Greater than<br>\$10 Billion | New York            | Atlanta          | Chicago          | Kansas<br>City | Dallas         | San<br>Francisco |
| Number of institutions reporting .....                 | 9,182                          | 4,390                      | 4,211                           | 471                            | 110                          | 1,173               | 1,227            | 2,011            | 2,133          | 1,867          | 771              |
| Commercial banks .....                                 | 7,769                          | 3,911                      | 3,434                           | 341                            | 83                           | 612                 | 1,071            | 1,650            | 2,020          | 1,732          | 684              |
| Savings institutions .....                             | 1,413                          | 479                        | 777                             | 130                            | 27                           | 561                 | 156              | 361              | 113            | 135            | 87               |
| <b>Total assets (in billions) .....</b>                | <b>\$9,076.8</b>               | <b>\$225.6</b>             | <b>\$1,160.6</b>                | <b>\$1,312.6</b>               | <b>\$6,377.9</b>             | <b>\$3,084.8</b>    | <b>\$1,882.7</b> | <b>\$1,695.3</b> | <b>\$456.3</b> | <b>\$563.4</b> | <b>\$1,394.3</b> |
| Commercial banks .....                                 | 7,602.5                        | 200.7                      | 910.0                           | 947.3                          | 5,544.5                      | 2,557.4             | 1,751.9          | 1,551.7          | 411.5          | 471.5          | 858.5            |
| Savings institutions .....                             | 1,474.3                        | 24.9                       | 250.6                           | 365.3                          | 833.4                        | 527.5               | 130.8            | 143.6            | 44.8           | 91.8           | 535.8            |
| <b>Total deposits (in billions) .....</b>              | <b>5,954.3</b>                 | <b>188.7</b>               | <b>927.0</b>                    | <b>882.1</b>                   | <b>3,956.5</b>               | <b>1,959.5</b>      | <b>1,288.2</b>   | <b>1,102.4</b>   | <b>291.0</b>   | <b>424.1</b>   | <b>889.0</b>     |
| Commercial banks .....                                 | 5,028.9                        | 169.0                      | 736.8                           | 645.8                          | 3,477.3                      | 1,609.9             | 1,196.0          | 998.0            | 263.0          | 371.2          | 590.8            |
| Savings institutions .....                             | 925.4                          | 19.7                       | 190.2                           | 236.3                          | 479.3                        | 349.6               | 92.2             | 104.4            | 28.1           | 53.0           | 298.2            |
| Net income (in millions) .....                         | 120,634                        | 2,087                      | 13,211                          | 17,673                         | 87,662                       | 37,883              | 24,791           | 21,655           | 7,196          | 7,505          | 21,603           |
| Commercial banks .....                                 | 102,578                        | 1,824                      | 11,075                          | 13,177                         | 76,502                       | 32,156              | 23,514           | 19,932           | 6,822          | 5,952          | 14,202           |
| Savings institutions .....                             | 18,056                         | 263                        | 2,136                           | 4,497                          | 11,160                       | 5,727               | 1,277            | 1,723            | 374            | 1,553          | 7,401            |
| <b>Performance Ratios (%) .....</b>                    |                                |                            |                                 |                                |                              |                     |                  |                  |                |                |                  |
| Yield on earning assets .....                          | 5.35                           | 5.87                       | 5.82                            | 5.48                           | 5.21                         | 5.14                | 5.33             | 5.22             | 6.25           | 5.64           | 5.55             |
| Cost of funding earning assets .....                   | 1.62                           | 1.79                       | 1.82                            | 1.68                           | 1.56                         | 1.74                | 1.59             | 1.66             | 1.66           | 1.56           | 1.38             |
| Net interest margin .....                              | 3.73                           | 4.07                       | 4.00                            | 3.80                           | 3.64                         | 3.41                | 3.73             | 3.56             | 4.59           | 4.08           | 4.17             |
| Noninterest income to assets .....                     | 2.31                           | 1.43                       | 1.46                            | 1.93                           | 2.58                         | 2.68                | 2.15             | 1.94             | 2.73           | 1.90           | 2.21             |
| Noninterest expense to assets .....                    | 3.19                           | 3.71                       | 3.33                            | 3.10                           | 3.17                         | 3.27                | 3.17             | 2.86             | 3.90           | 3.56           | 3.08             |
| Loan and lease loss provision to assets .....          | 0.43                           | 0.25                       | 0.28                            | 0.36                           | 0.47                         | 0.49                | 0.26             | 0.47             | 0.70           | 0.28           | 0.43             |
| Net operating income to assets .....                   | 1.28                           | 0.90                       | 1.10                            | 1.28                           | 1.33                         | 1.19                | 1.28             | 1.19             | 1.58           | 1.28           | 1.52             |
| Pretax return on assets .....                          | 2.05                           | 1.27                       | 1.63                            | 2.11                           | 2.14                         | 1.91                | 2.03             | 1.91             | 2.34           | 1.86           | 2.55             |
| <b>Return on assets .....</b>                          | <b>1.38</b>                    | <b>0.95</b>                | <b>1.18</b>                     | <b>1.42</b>                    | <b>1.42</b>                  | <b>1.27</b>         | <b>1.38</b>      | <b>1.31</b>      | <b>1.63</b>    | <b>1.37</b>    | <b>1.62</b>      |
| Return on equity .....                                 | 15.04                          | 8.19                       | 11.79                           | 13.90                          | 16.31                        | 14.24               | 15.32            | 15.31            | 15.39          | 14.35          | 16.13            |
| <b>Net charge-offs to loans and leases .....</b>       | <b>0.78</b>                    | <b>0.30</b>                | <b>0.36</b>                     | <b>0.53</b>                    | <b>0.93</b>                  | <b>1.15</b>         | <b>0.55</b>      | <b>0.71</b>      | <b>1.09</b>    | <b>0.40</b>    | <b>0.58</b>      |
| Loan and lease loss provision to net charge-offs ..... | 91.54                          | 134.93                     | 118.72                          | 109.86                         | 86.70                        | 85.27               | 78.19            | 101.33           | 92.90          | 113.09         | 105.97           |
| Efficiency ratio .....                                 | 56.59                          | 71.68                      | 64.51                           | 56.56                          | 54.80                        | 57.82               | 58.57            | 55.02            | 55.34          | 62.89          | 51.30            |
| % of unprofitable institutions .....                   | 5.69                           | 9.64                       | 2.16                            | 1.49                           | 0.91                         | 5.80                | 9.21             | 4.97             | 3.05           | 5.46           | 9.60             |
| % of institutions with earnings gains .....            | 58.75                          | 52.82                      | 63.76                           | 66.88                          | 68.18                        | 60.95               | 65.77            | 57.48            | 54.95          | 54.04          | 69.39            |
| <b>Condition Ratios (%) .....</b>                      |                                |                            |                                 |                                |                              |                     |                  |                  |                |                |                  |
| Earning assets to total assets .....                   | 86.54                          | 91.51                      | 91.79                           | 90.52                          | 84.59                        | 83.78               | 85.18            | 88.92            | 89.75          | 90.17          | 89.06            |
| Loss Allowance to:                                     |                                |                            |                                 |                                |                              |                     |                  |                  |                |                |                  |
| Loans and leases .....                                 | 1.57                           | 1.40                       | 1.33                            | 1.49                           | 1.65                         | 1.93                | 1.33             | 1.54             | 2.12           | 1.34           | 1.25             |
| Noncurrent loans and leases .....                      | 140.41                         | 128.42                     | 153.76                          | 165.13                         | 134.98                       | 131.28              | 167.68           | 131.33           | 199.83         | 135.04         | 129.14           |
| Noncurrent assets plus                                 |                                |                            |                                 |                                |                              |                     |                  |                  |                |                |                  |
| other real estate owned to assets .....                | 0.75                           | 0.83                       | 0.68                            | 0.62                           | 0.78                         | 0.78                | 0.56             | 0.86             | 0.84           | 0.76           | 0.76             |
| Equity capital ratio .....                             | 9.15                           | 11.49                      | 10.06                           | 10.35                          | 8.66                         | 9.05                | 8.78             | 8.49             | 10.59          | 9.61           | 10.04            |
| Core capital (leverage) ratio .....                    | 7.88                           | 11.11                      | 9.50                            | 9.16                           | 7.19                         | 7.74                | 7.41             | 7.86             | 9.01           | 8.69           | 8.14             |
| Tier 1 risk-based capital ratio .....                  | 10.47                          | 17.10                      | 13.74                           | 13.18                          | 9.22                         | 10.61               | 9.54             | 9.79             | 11.79          | 12.67          | 11.10            |
| Total risk-based capital ratio .....                   | 13.00                          | 18.21                      | 14.96                           | 14.87                          | 12.16                        | 13.29               | 12.11            | 12.66            | 13.51          | 14.08          | 13.46            |
| Net loans and leases to deposits .....                 | 89.83                          | 71.84                      | 79.98                           | 89.98                          | 92.96                        | 76.26               | 87.71            | 98.33            | 107.52         | 79.59          | 111.39           |
| Net loans to total assets .....                        | 58.93                          | 60.08                      | 63.88                           | 60.47                          | 57.67                        | 48.44               | 60.01            | 63.94            | 68.58          | 59.92          | 71.02            |
| Domestic deposits to total assets .....                | 57.43                          | 83.62                      | 79.78                           | 66.43                          | 50.59                        | 46.19               | 63.78            | 59.84            | 63.78          | 75.02          | 61.63            |
| <b>Structural Changes .....</b>                        |                                |                            |                                 |                                |                              |                     |                  |                  |                |                |                  |
| New Charters .....                                     | 119                            | 115                        | 3                               | 1                              | 0                            | 9                   | 36               | 7                | 13             | 20             | 34               |
| Institutions absorbed by mergers .....                 | 275                            | 121                        | 122                             | 26                             | 6                            | 48                  | 42               | 58               | 44             | 43             | 40               |
| Failed Institutions .....                              | 3                              | 2                          | 1                               | 0                              | 0                            | 1                   | 0                | 1                | 0              | 0              | 1                |
| <b>PRIOR FULL YEARS</b><br>(The way it was...)         |                                |                            |                                 |                                |                              |                     |                  |                  |                |                |                  |
| Number of institutions .....                           | 2002                           | 9,354                      | 4,681                           | 4,117                          | 450                          | 106                 | 1,212            | 1,237            | 2,055          | 2,167          | 1,901            |
| ..... 2000   | 9,904                          | 5,464                      | 3,898                           | 437                            | 105                          |                     | 1,292            | 1,307            | 2,197          | 2,268          | 2,014            |
| ..... 1998   | 10,464                         | 6,110                      | 3,817                           | 450                            | 87                           |                     | 1,350            | 1,341            | 2,346          | 2,390          | 2,180            |
| Total assets (in billions) .....                       | 2002                           | \$8,436.2                  | \$237.9                         | \$1,124.8                      | \$1,279.0                    | \$5,794.5           | \$2,893.0        | \$1,711.1        | \$1,572.1      | \$440.1        | \$581.5          |
| ..... 2000   | 7,462.9                        | 262.1                      | 1,018.5                         | 1,199.1                        | 4,983.2                      | 2,580.7             | 1,570.8          | 1,255.4          | 461.9          | 561.2          | 1,032.9          |
| ..... 1998   | 6,531.1                        | 288.6                      | 972.0                           | 1,259.8                        | 4,010.6                      | 2,282.7             | 1,141.4          | 1,065.4          | 413.2          | 548.8          | 1,079.6          |
| Return on assets (%) .....                             | 2002                           | 1.30                       | 1.00                            | 1.16                           | 1.44                         | 1.31                | 1.11             | 1.34             | 1.29           | 1.58           | 1.41             |
| ..... 2000   | 1.14                           | 0.95                       | 1.15                            | 1.20                           | 1.14                         | 1.23                | 1.02             | 1.02             | 1.33           | 1.04           | 1.23             |
| ..... 1998   | 1.16                           | 1.09                       | 1.21                            | 1.41                           | 1.07                         | 1.05                | 1.29             | 1.20             | 1.45           | 1.18           | 1.08             |
| Net charge-offs to loans & leases (%) .....            | 2002                           | 0.97                       | 0.32                            | 0.41                           | 0.69                         | 1.18                | 1.45             | 0.71             | 0.77           | 1.19           | 0.44             |
| ..... 2000   | 0.59                           | 0.37                       | 0.27                            | 0.59                           | 0.67                         | 0.67                | 0.61             | 0.39             | 0.76           | 0.37           | 0.67             |
| ..... 1998   | 0.59                           | 0.28                       | 0.36                            | 0.83                           | 0.59                         | 0.79                | 0.44             | 0.39             | 0.68           | 0.43           | 0.64             |
| Noncurrent assets plus                                 |                                |                            |                                 |                                |                              |                     |                  |                  |                |                |                  |
| OREO to assets (%) .....                               | 2002                           | 0.90                       | 0.85                            | 0.74                           | 0.69                         | 0.98                | 1.01             | 0.78             | 1.00           | 0.82           | 0.81             |
| ..... 2000   | 0.71                           | 0.66                       | 0.59                            | 0.67                           | 0.75                         | 0.71                | 0.82             | 0.74             | 0.62           | 0.66           | 0.62             |
| ..... 1998   | 0.66                           | 0.72                       | 0.64                            | 0.75                           | 0.64                         | 0.78                | 0.54             | 0.58             | 0.57           | 0.63           | 0.67             |
| Equity capital ratio (%) .....                         | 2002                           | 9.20                       | 11.29                           | 10.06                          | 10.06                        | 8.76                | 8.85             | 9.37             | 8.58           | 10.33          | 9.60             |
| ..... 2000   | 8.49                           | 11.33                      | 9.82                            | 8.94                           | 7.96                         | 8.31                | 8.61             | 7.98             | 9.48           | 8.78           | 8.75             |
| ..... 1998   | 8.52                           | 11.13                      | 9.84                            | 9.36                           | 7.76                         | 8.13                | 9.17             | 8.42             | 8.80           | 8.73           | 8.58             |

\* See Table IV-A (page 9) for explanations.



# Quarterly Banking Profile

2025 QUARTER 3

TABLE III-A. Third Quarter 2025, All FDIC-Insured Institutions

| THIRD QUARTER<br>(The way it is...)                 | All Insured<br>Institutions | Asset Size Distribution       |                                    |                                   |                                     |                                  | Geographic Regions* |           |           |                |           |                  |      |
|---|-----------------------------|-------------------------------|------------------------------------|-----------------------------------|-------------------------------------|----------------------------------|---------------------|-----------|-----------|----------------|-----------|------------------|------|
|   |                             | Less Than<br>\$100<br>Million | \$100<br>Million to<br>\$1 Billion | \$1 Billion<br>to \$10<br>Billion | \$10 Billion<br>to \$250<br>Billion | Greater<br>Than \$250<br>Billion | New York            | Atlanta   | Chicago   | Kansas<br>City | Dallas    | San<br>Francisco |      |
|   |                             |                               |                                    |                                   |                                     |                                  |                     |           |           |                |           |                  |      |
| Number of institutions reporting                    | 4,379                       | 611                           | 2,719                              | 895                               | 142                                 | 12                               | 509                 | 498       | 938       | 1,125          | 990       | 319              |      |
| Commercial banks                                    | 3,848                       | 531                           | 2,420                              | 757                               | 128                                 | 12                               | 266                 | 457       | 813       | 1,095          | 927       | 290              |      |
| Savings institutions                                | 531                         | 80                            | 299                                | 138                               | 14                                  | 0                                | 243                 | 41        | 125       | 30             | 63        | 29               |      |
| Total assets (in billions)                          | \$25,113.2                  | \$38.0                        | \$1,041.5                          | \$2,505.8                         | \$7,293.7                           | \$14,234.2                       | \$4,687.9           | \$5,288.3 | \$6,524.0 | \$4,469.9      | \$1,852.2 | \$2,290.9        |      |
| Commercial banks                                    | 23,937.0                    | 33.3                          | 920.8                              | 2,151.9                           | 6,596.9                             | 14,234.2                         | 4,300.0             | 5,273.0   | 6,449.4   | 4,409.5        | 1,495.2   | 2,009.9          |      |
| Savings institutions                                | 1,176.2                     | 4.8                           | 120.7                              | 353.9                             | 696.8                               | 0.0                              | 387.9               | 15.3      | 74.6      | 60.4           | 356.9     | 281.0            |      |
| Total deposits (in billions)                        | 19,749.8                    | 31.3                          | 881.3                              | 2,085.0                           | 5,956.9                             | 10,795.4                         | 3,724.7             | 4,181.5   | 4,834.1   | 3,576.3        | 1,552.5   | 1,880.7          |      |
| Commercial banks                                    | 18,791.7                    | 27.8                          | 784.7                              | 1,802.8                           | 5,381.0                             | 10,795.4                         | 3,414.5             | 4,169.4   | 4,780.2   | 3,525.0        | 1,251.3   | 1,651.3          |      |
| Savings institutions                                | 958.1                       | 3.5                           | 96.6                               | 282.2                             | 575.9                               | 0.0                              | 310.2               | 12.1      | 53.9      | 51.3           | 301.2     | 229.4            |      |
| Bank net income (in millions)                       | 79,294                      | 222                           | 3,458                              | 8,107                             | 23,106                              | 44,401                           | 12,966              | 17,434    | 20,743    | 13,344         | 5,276     | 9,531            |      |
| Commercial banks                                    | 75,475                      | 92                            | 3,134                              | 7,248                             | 20,600                              | 44,401                           | 12,170              | 17,402    | 20,379    | 13,065         | 4,293     | 8,167            |      |
| Savings institutions                                | 3,818                       | 130                           | 323                                | 859                               | 2,506                               | 0                                | 796                 | 32        | 364       | 279            | 983       | 1,364            |      |
| <b>Performance Ratios (annualized, %)</b>           |                             |                               |                                    |                                   |                                     |                                  |                     |           |           |                |           |                  |      |
| Yield on earning assets                             | 5.65                        | 5.60                          | 5.85                               | 6.00                              | 5.92                                | 5.42                             | 5.59                | 5.70      | 5.20      | 5.61           | 5.33      | 7.19             |      |
| Cost of funding earning assets                      | 2.30                        | 1.61                          | 1.93                               | 2.14                              | 2.31                                | 2.36                             | 2.75                | 2.14      | 2.18      | 2.29           | 1.88      | 2.49             |      |
| Net interest margin                                 | 3.34                        | 3.99                          | 3.91                               | 3.86                              | 3.61                                | 3.06                             | 2.84                | 3.56      | 3.02      | 3.31           | 3.44      | 4.70             |      |
| Noninterest income to assets                        | 1.37                        | 3.61                          | 1.23                               | 1.10                              | 1.33                                | 1.43                             | 1.32                | 1.08      | 1.61      | 1.13           | 0.80      | 2.36             |      |
| Noninterest expense to assets                       | 2.44                        | 4.33                          | 3.18                               | 2.75                              | 2.59                                | 2.24                             | 2.22                | 2.32      | 2.37      | 2.27           | 2.30      | 3.79             |      |
| Credit loss provision to assets**                   | 0.33                        | 0.10                          | 0.14                               | 0.27                              | 0.37                                | 0.34                             | 0.23                | 0.38      | 0.30      | 0.30           | 0.15      | 0.77             |      |
| Net operating income to assets                      | 1.28                        | 2.40                          | 1.35                               | 1.36                              | 1.31                                | 1.25                             | 1.11                | 1.32      | 1.29      | 1.20           | 1.29      | 1.68             |      |
| Pretax return on assets                             | 1.61                        | 2.83                          | 1.56                               | 1.61                              | 1.65                                | 1.59                             | 1.42                | 1.61      | 1.65      | 1.56           | 1.37      | 2.22             |      |
| Return on assets                                    | 1.27                        | 2.34                          | 1.34                               | 1.31                              | 1.28                                | 1.25                             | 1.11                | 1.32      | 1.28      | 1.20           | 1.14      | 1.69             |      |
| Return on equity                                    | 12.43                       | 16.69                         | 12.48                              | 12.04                             | 11.81                               | 12.83                            | 10.37               | 12.30     | 13.46     | 12.28          | 10.62     | 16.22            |      |
| Net charge-offs to loans and leases                 | 0.61                        | 0.13                          | 0.16                               | 0.30                              | 0.59                                | 0.78                             | 0.39                | 0.83      | 0.54      | 0.61           | 0.20      | 1.03             |      |
| Loan and lease loss provision to net charge-offs    | 101.63                      | 131.66                        | 131.20                             | 125.18                            | 100.10                              | 99.12                            | 107.32              | 85.84     | 114.87    | 96.18          | 116.75    | 110.70           |      |
| Efficiency ratio                                    | 54.73                       | 59.10                         | 64.68                              | 57.54                             | 54.98                               | 53.16                            | 56.82               | 52.69     | 53.97     | 54.69          | 56.93     | 55.67            |      |
| % of unprofitable institutions                      | 5.00                        | 14.73                         | 3.64                               | 2.79                              | 3.52                                | 0.00                             | 7.47                | 7.03      | 4.69      | 2.49           | 5.05      | 7.52             |      |
| % of institutions with earnings gains               | 78.10                       | 62.68                         | 79.99                              | 82.46                             | 78.87                               | 100.00                           | 79.17               | 77.51     | 80.28     | 81.24          | 72.73     | 76.49            |      |
| <b>Structural Changes</b>                           |                             |                               |                                    |                                   |                                     |                                  |                     |           |           |                |           |                  |      |
| New reporters                                       | 0                           | 0                             | 0                                  | 0                                 | 0                                   | 0                                | 0                   | 0         | 0         | 0              | 0         | 0                |      |
| Institutions absorbed by mergers                    | 38                          | 5                             | 22                                 | 9                                 | 2                                   | 0                                | 10                  | 2         | 4         | 9              | 10        | 3                |      |
| Failed institutions                                 | 0                           | 0                             | 0                                  | 0                                 | 0                                   | 0                                | 0                   | 0         | 0         | 0              | 0         | 0                |      |
| <b>PRIOR THIRD QUARTERS<br/>(The way it was...)</b> |                             |                               |                                    |                                   |                                     |                                  |                     |           |           |                |           |                  |      |
| Return on assets (%)                                | 2024                        | 1.09                          | 0.91                               | 1.14                              | 1.07                                | 1.08                             | 1.09                | 0.74      | 1.14      | 1.21           | 1.12      | 0.99             | 1.37 |
|   | 2022                        | 1.21                          | 0.99                               | 1.31                              | 1.37                                | 1.41                             | 1.07                | 1.15      | 1.24      | 1.19           | 1.01      | 1.22             | 1.63 |
|   | 2020                        | 0.97                          | 0.90                               | 1.26                              | 1.19                                | 1.16                             | 0.80                | 0.89      | 0.86      | 1.15           | 0.64      | 1.16             | 1.35 |
| Net charge-offs to loans & leases (%)               | 2024                        | 0.67                          | 0.15                               | 0.13                              | 0.26                                | 0.75                             | 0.79                | 0.66      | 0.79      | 0.50           | 0.67      | 0.16             | 1.17 |
|   | 2022                        | 0.26                          | 0.04                               | 0.05                              | 0.16                                | 0.33                             | 0.26                | 0.26      | 0.30      | 0.17           | 0.26      | 0.10             | 0.42 |
|   | 2020                        | 0.46                          | 0.10                               | 0.11                              | 0.18                                | 0.61                             | 0.49                | 0.43      | 0.49      | 0.39           | 0.51      | 0.22             | 0.68 |

\* See Table IV-A for explanations.

\*\* For institutions that have adopted ASU 2016-13, the numerator represents provisions for credit losses on a consolidated basis; for institutions that have not adopted ASU 2016-13, the numerator represents the provision for loan and lease losses. Beginning in 2024, almost all institutions have adopted ASU 2016-13.



October 23, 2025

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Re: Comment on Docket ID OCC-2023-0016, Regarding Regulatory Publication and Review  
Under the Economic Growth and Regulatory Paperwork Reduction Act of 1996

Dear Sir or Madam,

The American Bankers Association (ABA)<sup>1</sup> appreciates the opportunity to provide comments on the regulatory burden review under the Economic Growth and Regulatory Paperwork Reduction Act of 1996 (EGRPRA).<sup>2</sup>

As required by EGRPRA, the federal banking agencies (Agencies)<sup>3</sup> must review their regulations at least every ten years to identify outdated or otherwise unnecessary regulatory requirements imposed on insured depository institutions. This process includes providing public notice, gathering comments on specific regulatory categories, and ultimately producing a report for Congress.<sup>4</sup> This report should summarize the key regulatory burdens raised, assess their validity, and recommend whether those issues are best addressed by regulation or legislation.<sup>5</sup>

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<sup>1</sup> The American Bankers Association is the voice of the nation's \$25.0 trillion banking industry, which is composed of small, regional, and large banks that together employ approximately 2.1 million people, safeguard \$19.7 trillion in deposits, and extend \$13.1 trillion in loans.

<sup>2</sup> Economic Growth and Regulatory Paperwork Reduction Act, 90 Fed. Reg. 35,241 (Jul. 25, 2025).

<sup>3</sup> The current EGRPRA review includes regulations issued by the Federal Financial Institutions Examination Council, the Office of the Comptroller of the Currency (OCC), the Federal Deposit Insurance Corporation (FDIC), and the Board of Governors of the Federal Reserve System. However, ABA believes it should also include rules issued by the Bureau of Consumer Financial Protection (CFPB) and the Financial Crimes Enforcement Network (FinCEN) to address a broader range of regulatory challenges impacting banks.

<sup>4</sup> See 12 USC § 3311.

<sup>5</sup> *Id.*



ABA supports the goals and purpose of the EGRPRA and strongly encourages the Agencies to use this third decennial review as an opportunity to provide meaningful regulatory relief for banks, enabling them to better serve their customers. Although ABA provided detailed recommendations in previous EGRPRA reviews, few were adopted by regulators.

In response, ABA is now focusing on a broader goal: removing unnecessary regulatory burdens, a priority shared by both regulators and the banking industry. The recommendations and examples below regarding rules of procedure and safety and soundness issues require immediate attention, but they also point to a broader underlying issue. We encourage the Agencies to use the examples below to identify broader rules and requirements that hinder, rather than help, banks in effectively serving their customers.

## I. Banking Operations

### a. Regulation II

The Board's Regulation II routing and exclusivity restrictions (2022 Final Rule) impose an unnecessary burden on card issuing institutions and networks.<sup>6</sup> This result is not mandated by statute. Regulation II provides that an issuer or payment card network shall not, directly or indirectly, (i) restrict the number of payment card networks on which an electronic debit transaction may be processed to less than two unaffiliated networks, or (ii) inhibit the ability of any person that accepts or honors debit cards to direct the routing of electronic debit transactions over any payment card network that processes such transactions.<sup>7</sup> In 2022, the Board published an amendment to Regulation II to "clarify" that the requirement that each debit card transaction must be able to be processed on at least two unaffiliated payment card networks applies to card-not-present transactions.<sup>8</sup>

The Durbin Amendment requires the Board to issue regulations *prohibiting* issuers and networks from *restricting* the number of networks over which an electronic transaction may be processed to one network.<sup>9</sup> Yet Regulation II *requires* issuers to *enable* multiple networks on a debit card. Regulation II thus requires issuers to seek out and negotiate transactions with networks, even if the issuer has determined for legitimate business reasons, unconnected to any "restriction," to enable only one network on its debit card.

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<sup>6</sup> See Debit Card Interchange Fees and Routing, 88 Fed. Reg. 78,100 (Nov. 14, 2023); Debit Card Interchange Fees and Routing, 87 Fed. Reg. 61,217 (Oct. 11, 2022) (12 C.F.R. pt. 235).

<sup>7</sup> See 12 C.F.R. § 235.7.

<sup>8</sup> Debit Card Interchange Fees and Routing, 87 Fed. Reg. 61,217 (Oct. 11, 2022).

<sup>9</sup> See 15 U.S.C. § 1693o-2(b).



Moreover, the current rule, as amended by the 2022 Final Rule, evidences a wholesale reworking of the network exclusivity and routing requirements. It imposes new, vague responsibilities on issuers for transaction types that do not exist under either the Durbin Amendment or Regulation II and requires issuers to undertake expensive and time-consuming efforts to change their core network infrastructure.

For example, the current rule, as amended by the 2022 Final Rule, requires that issuers “enable” multiple unaffiliated networks for each type of transaction, among other transaction categories, providing only that particular types of transactions include, but may not be limited to, card-present and card-not-present transaction. As a result, issuers must undertake to make their systems compatible—to the extent compatibility was the Board’s intent with the “enablement” requirement—with multiple networks for at least these two transaction types, and perhaps others.

These ambiguous amended routing and exclusivity provisions force issuers to contract with and accept services from payment card networks that have not, for example, proven their ability to handle fraud security in the category of card-not-present transactions and with which these issuers would not otherwise engage in business. These obligations interfere significantly with the way in which issuers choose to conduct their business and have the effect of stifling competition.

Further, the 2022 Final Rule contravenes established Board policy. The Board has long maintained that it should not mandate specific technology. In 2015, for example, after receiving an inquiry from Senator Mark Warner (D-Va.), former Board Chair Janet Yellen indicated that “[i]n our role as supervisor, the Federal Reserve does not mandate use of a specific technological approach to payment card security … This approach is intended to allow financial institutions and other industry participants sufficient flexibility to design policies and procedures that effectively reduce fraud losses to all parties involved in payment card transactions.”<sup>10</sup>

The current routing and exclusivity restrictions in Regulation II essentially reverse the Board’s stated policy position, which aligns with that of other federal regulators, greatly reducing the flexibility that financial institutions employ in being discerning selectors of payment networks for their customers, in order to provide safe, efficient, and reliable payment options for its customers. In effect, the restrictions create the conditions for a *de facto* mandate that drives the majority of transactions across networks and with authentication methods that regulated, insured financial institution may judge to be inferior and not best in class. That issuers have the full force of federal enforcement upon them to accept these transactions, despite well-reasoned reservations, is counterintuitive and undermines consumers’ best interests.

Beyond interchange fee limitations and routing and exclusivity requirements, the Durbin Amendment permits, but does not require, the Board to promulgate regulations regarding network fees solely for purposes of ensuring that (i) a network fee is not used to directly or indirectly compensate an issuer with respect to an electronic debit transaction; and (ii) a network

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<sup>10</sup> Letter from Federal Reserve Chair Janet Yellen to Sen. Warner (D-Va.), Mar. 5, 2015.



fee is not used to circumvent or evade the interchange fee limitations.<sup>11</sup> “Network fees” are defined under the Durbin Amendment to mean “any fee charged and received by a payment card network with respect to an electronic debit transaction, other than an interchange transaction fee.”<sup>12</sup>

Notwithstanding this narrow, permissive rule-writing authority, the Board promulgated a far-reaching prohibition on net compensation that exceeds the grant of rule-writing authority in the Durbin Amendment. For example, the current rule requires that issuers consider network payments for all “debit card-related activities” when calculating net compensation, whereas the Durbin Amendment is limited to direct or indirect compensations with respect to an electronic debit transaction.<sup>13</sup> By including network payments for all debit-related activities, which may include marketing incentives or signing bonuses, the Board has exceeded its authority under the Durbin Amendment, which has had an adverse effect on the market and competition.

For the reasons stated above, the Board should (1) rescind the 2022 Final Rule, and (2) narrow the net compensation provisions of the current rule in a manner consistent with its narrow rule-writing authority under the Durbin Amendment.

#### **b. Regulation CC**

Simple, but impactful, updates to Regulation CC would make it easier to understand and implement by conforming it to present-day operational realities. For example, Regulation CC still references the now outdated concept of local checks. When the regulation was initially passed, checks were processed at multiple regional Federal Reserve Banks. At that time, when a depository bank's indorsement was not in the same check-processing region as the address associated with the routing number in its indorsement, it was considered a “nonlocal check” and was treated differently under several provisions of Regulation CC. By 2010, the check-processing operations of the Reserve Banks had been fully consolidated into the Federal Reserve Bank of Cleveland. This established only a single check-processing region for purposes of Regulation CC and eliminated the concept of “nonlocal” checks. Since then, the Federal Reserve has updated certain portions of Regulation CC to remove references to nonlocal checks.<sup>14</sup>

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<sup>11</sup> See 15 U.S.C. § 1693o-2(a)(8).

<sup>12</sup> See 15 U.S.C. § 1693o-2(c)(10).

<sup>13</sup> Compare 12 C.F.R. § 235.6(b) and 15 U.S.C. § 1693o-2(a)(8)(b)(i).

<sup>14</sup> See Final Rule Amending Subparts A, C, and D of Regulation CC, Availability of Funds and Collection of Checks, 82 Fed. Reg. 27552 (Jun. 15, 2017) (see fn 10, noting that nonlocal checks are “a null set of checks.”); see also Final Rule Amending Appendix A of Regulation CC, 75 Fed. Reg. 2291 (Jan. 5, 2010) (reflecting the restructuring of the Federal Reserve Banks’ check-processing operations).



Despite this, in several places the text of Regulation CC still distinguishes between “local” and “nonlocal” checks, including setting forth different funds availability schedules for each.<sup>15</sup> Adding to the confusion, the Official Commentary on Regulation CC extensively refers to “nonlocal” checks and explains the now-obsolete distinction between the two check types.<sup>16</sup> The Federal Reserve Board acknowledges that the term is obsolete in its Regulation CC Compliance Guide for Small Entities, where it notes “[s]ince there is now only one Reserve Bank check-processing region, however, there are no longer any “nonlocal” checks for purposes of Regulation CC.”<sup>17</sup> While small entity compliance guides are valuable resources, it would significantly improve the clarity of the regulation itself (and the official guidance in the Code of Federal Regulation) to remove references to “nonlocal checks.”

The Federal Reserve should improve Regulation CC’s clarity and accuracy by issuing a rule to eliminate references to “nonlocal checks” across the regulation. This simple technical amendment would make the regulation significantly easier to use, by aligning it with the operational realities of check-processing that have been in place for the last 15 years.

Similarly, Regulation CC defines a “business day” to exclude a list of enumerated Federal holidays, but the list is no longer current.<sup>18</sup> The list of holidays does not reflect 2021 legislation establishing Juneteenth as a Federal holiday, which can cause confusion. The Official Commentary to Regulation CC states that, for the purpose of calculating funds availability requirements, “there is less need to identify a day when a particular bank is open. . . [therefore] [b]usiness day generally follows the standard Federal Reserve Bank holiday schedule.”<sup>19</sup> While this clarification is helpful, as noted above, the rule itself should clearly and accurately reflect banks’ obligations.

We recommend that the Federal Reserve add Juneteenth to the list of excluded “business days” in the rule, or, take the opportunity to make amendments to the Federal holiday schedule self-executing. The Federal Reserve could cross-reference the Federal Reserve’s published holiday schedule, as the Official Commentary does.<sup>20</sup> Or, it could cross- reference the U.S. Code citation listing the official Federal holidays, which not only was updated to reflect Juneteenth but will

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<sup>15</sup> See e.g. 12 CFR § 229.12, *see generally* 12 CFR Part 229, Appendix C, Appendix E, Appendix F.

<sup>16</sup> See 12 CFR Part 229, Appendix E. The Official Commentary references “nonlocal checks” 75 times, without indicating the term no longer has meaning.

<sup>17</sup> <https://www.federalreserve.gov/supervisionreg/guide-regulation-cc-compliance.htm>.

<sup>18</sup> See 12 C.F.R. § 229.2(g).

<sup>19</sup> Official Commentary on Regulation CC, 12 C.F.R. Part 229, Appendix E (“229.2(f) Banking Day and (g) Business Day”).

<sup>20</sup> See <https://www.federalreserve.gov/aboutthefed/k8.htm>.



continue to reflect Congress' addition and elimination of Federal holidays.<sup>21</sup> Regardless of the means, the Federal Reserve should make Regulation CC more usable and understandable by amending it to directly reflect the current Federal holiday schedule.

Additionally, the rapid evolution of check fraud—driven by advances in technology, organized criminal activity, and the proliferation of counterfeit and altered checks—has exposed significant challenges in balancing prompt funds availability with the need for robust fraud controls. The ABA reiterates the recommendations to improve the exception hold framework, which we submitted to the Agencies in response to their RFI on Payments Fraud.<sup>22</sup>

First, the Agencies should support the expansion of “reasonable cause” holds. This recommendation supports further expansion of the “reasonable cause to doubt collectability” exception. Its current application often depends on evidence obtained from the paying bank, such as confirmation that the check is unauthorized. This reliance on external confirmation creates delays because the paying bank must first verify the check with the maker. In practice, depository institutions frequently detect red flags earlier in the process through internal staff, systems, and fraud detection protocols. Explicitly recognizing internal fraud detection as sufficient “reasonable cause” would allow institutions to act promptly, protecting consumers and businesses while reducing criminal opportunity. We recommend clarification that the “reasonable cause” exception applies when a receiving depository institution’s internal review—without waiting for paying bank confirmation—provides a reasonable suspicion of fraud. If this requires Congressional action, we recommend the Agencies request appropriate legislation.

Second, the Agencies should support creating a new fraud exception hold. “Reasonable cause” holds alone may be inadequate. In this case, we recommend the Agencies ask Congress to amend EFTA to add a distinct “fraud” exception hold. This exception would expressly authorize depository institutions to place holds based on reasonable suspicion of fraud identified through their own systems, processes, or alerts. A clear fraud exception would not only reduce consumer and business losses but also deter fraud attempts by reducing criminals’ perception that check fraud is low risk.

Third, the Agencies should support revising the definition of a “new account.” Currently, EFTA defines a new account as one opened for 30 days or less. Fraudsters often maintain accounts beyond the 30-day period precisely to avoid this restriction, leaving banks without a critical tool to manage risk. A longer timeframe—such as 120 days—would better reflect today’s fraud

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<sup>21</sup> See 5 U.S.C § 6103.

<sup>22</sup> See ABA Letter to the Agencies re RFI on Payments Fraud (filed Sept. 18, 2025).



landscape, giving institutions sufficient time to evaluate customer behavior and implement effective controls. We recommend the Agencies ask Congress for this change.

Fourth, given the increasing sophistication of check fraud, we recommend maintaining or extending current regulatory hold times for check deposits and avoid shortening these periods that would undermine banks' ability to detect and prevent fraud before funds are irreversibly withdrawn. We urge the Agencies to recognize the operational realities of modern fraud and support longer hold periods, allowing institutions sufficient time to investigate and validate deposits.

These recommendations reflect the need for Regulation CC to adapt to the realities of today's fraud landscape. By preserving and extending hold periods, expanding exception holds, and revising the "new account" definition, the Agencies can empower depository institutions to more effectively detect, prevent, and mitigate payments fraud—while maintaining fair and timely access to funds for legitimate customers.

## II. Capital

### a. Leverage ratio reform

ABA strongly supports a holistic review of leverage ratio requirements to ensure that all leverage ratios function as a backstop to risk-based capital requirements and not a binding constraint. As the agencies have acknowledged, leverage ratios should generally serve as backstops to risk-based capital requirements. It is well recognized by policymakers that when leverage ratios bind, it can discourage low risk and relatively safe activities versus the riskiest activities. We believe it is important for the banking agencies to restore leverage ratios to a backstop as intended.

ABA has submitted a response in support of the agencies' recent consultation, which proposes to recalibrate the eSLR and corresponding TLAC and LTD leverage buffer requirements.<sup>23</sup>

ABA has long argued that low-risk and riskless assets, such as reserves on deposit at the Federal Reserve, cash, and U.S. Treasury securities, should be excluded from leverage ratio calculations.<sup>24</sup> Their inclusion can disincentivize banks from engaging in stabilizing activities

<sup>23</sup> See Comment Letter on Regulatory Capital Rule: Modifications to the Enhanced Supplementary Leverage Ratio Standards for U.S. Global Systemically Important Bank Holding Companies and Their Subsidiary Depository Institutions; Total Loss-Absorbing Capacity and Long-Term Debt Requirements for U.S. Global Systemically Important Bank Holding Companies, (2025), <https://www.aba.com/-/media/documents/comment-letter/cleslr20250826.pdf>

<sup>24</sup> See Comment Letter on Regulatory Capital, eSLR Standards for U.S. GSIBs and Certain of their Subsidiary IDIs; TLAC Requirements for U.S. GSIB Holding Companies, (2018), <https://www.aba.com/-/media/documents/archives/comment-letter/revisions-to-enhanced-supplementary-leverage-ratio.pdf>



when those functions are most needed. Their exclusion, particularly in stressed macroeconomic circumstances, would provide banks with flexibility to accommodate deposit inflows and facilitate Treasury market intermediation during flights to safety. The existing framework inadvertently penalizes banks for performing these essential functions when they are most needed.

The agencies should consider future proposals excluding such assets from the leverage ratio calculations for all banks. We echo the recent remarks of Federal Reserve Vice Chair Bowman that the agencies should “reconsider capital requirements for a wider range of banks, including the SLR’s application to banks with more than \$250 billion in assets, tier 1 leverage requirements, and the calibration of the community bank leverage ratio.”<sup>25</sup>

Similarly, the agencies should exercise their existing statutory authority to reduce the community bank leverage ratio (CBLR) from 9 percent to 8 percent. We share Vice Chair Bowman’s views that this change would “not only allow more community banks to adopt the framework but also increase balance sheet capacity for all CBLR firms, facilitating additional support for local economies through lending.”<sup>26</sup>

### **b. Stress testing framework**

We reiterate our views that many aspects of the stress testing framework are in need of substantial reform.<sup>27</sup> The below points are not exhaustive and the industry will provide a full response after the 2025 stress testing Proposal is released.<sup>28</sup>

In considering revisions to the stress testing framework, the Federal Reserve should ensure that capitalization for the same risks is not duplicated in the Federal Reserve’s capital rule and applicable buffers; provide greater transparency to banking organizations with respect to models and stress testing results; and fully and clearly define the paths of additional variables in the stress testing scenarios.

Certain aspects of the stress testing framework should be recalibrated to improve risk sensitivity – in particular, the Global Market Shock (GMS) and Large Counterparty Default (LCD) components. For instance, the GMS’s assumption of no liquidity over an extended period of time

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<sup>25</sup> Michelle Bowman, “Unintended Policy Shifts and Unexpected Consequences,” Conference on the Effectiveness of Monetary Policy during and after the COVID-19 Pandemic, International Journal of Central Banking and the Czech National Bank, Prague, Czech Republic, June 23, 2025.

<https://www.federalreserve.gov/news/events/speech/bowman20250623a.htm>

<sup>26</sup> Michelle Bowman, “Thoughts on the Economy and Community Bank Capital,” Kansas Bankers Association 2025 CEO & Senior Management Summit, Colorado Springs, Colorado, August 9, 2025.

<https://www.federalreserve.gov/news/events/speech/bowman20250809a.htm>

<sup>27</sup> See Comment Letter on Modifications to the Capital Plan Rule and Stress Capital Buffer Requirement, (2025), <https://www.aba.com/-/media/documents/comment-letter/jointcapital20250623.pdf>

<sup>28</sup> See Open board meeting - October 24, 2025 (2025) Federal Reserve Board - Open Board Meeting. <https://www.federalreserve.gov/aboutthefed/boardmeetings/20251024open.htm>



should be modified to an assumption of limited liquidity. In addition, the LCD should be modified to reflect a default based on the average of a banking organization's top counterparties, not the single largest counterparty.

Similarly, the supervisory pre-provision net revenue (PPNR) and loan loss models should better align with market realities. For example, PPNR models should reflect higher trading income derived from client-driven activity during periods of volatility and the loan loss models should better reflect underlying collateral on secured loans.

#### **c. Long-term debt requirements**

We encourage the agencies to revisit the need for long-term debt requirements. While we continue to support an appropriately calibrated total loss absorbing capacity (TLAC) requirement for covered BHCs, a separate long-term debt requirement is unnecessary and should be eliminated.<sup>29</sup> Covered BHCs should be able to satisfy their minimum TLAC requirements by freely substituting equity for long-term debt securities and long-term debt securities for equity, subject to applicable regulatory capital requirements.

We also urge the agencies to rescind the 2023 LTD proposal for large depository institution holding companies, and large IDIs.<sup>30</sup>

#### **d. Basel III Endgame**

We reiterate our views that the 2023 Basel III proposal was fundamentally flawed.<sup>31</sup> As the agencies consider next steps for a new proposal, they should consider the framework more holistically, removing gold-plating in the original proposal, addressing the duplication with the stress testing framework, and addressing known issues with the GSIB requirements, including the need to index the U.S. Method 2's fixed coefficients to nominal GDP to account for the inflationary effect of economic growth on firms' scores.

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<sup>29</sup> See Comment Letter on the Notice of Proposed Rulemaking on External TLAC, Long-Term Debt, Clean Holding Company and Other Requirements Applicable to U.S. G-SIBs , (2016), [https://www.federalreserve.gov/secrs/2016/april/20160422/r-1523/r-1523\\_032816\\_130250\\_545759023734\\_1.pdf](https://www.federalreserve.gov/secrs/2016/april/20160422/r-1523/r-1523_032816_130250_545759023734_1.pdf).

<sup>30</sup> Notice of Proposed Rulemaking, Long-Term Debt Requirements for Large Bank Holding Companies, Certain Intermediate Holding Companies of Foreign Banking Organizations, and Large Insured Depository Institutions, 88 Fed. Reg. 64524 (Sep. 19, 2023).

<sup>31</sup> See Comment Letter on the Regulatory Capital Rule: Large Banking Organizations and Banking Organizations with Significant Trading Activity, (2024), <https://www.aba.com/-/media/documents/comment-letter/ltrbaselendgame20240116.pdf>



The recent Federal Reserve stress testing results showed that “large banks are well positioned to weather a severe recession.”<sup>32</sup> We share FDIC Acting Chairman Hill’s views that “a proposal that is roughly capital neutral...remains a prudent starting point.”<sup>33</sup>

#### e. U.S. standardized requirements under Regulation Q

##### i. Capital deductions

The agencies should retain the requirements from the 2019 Simplifications Rule that simplified the framework for deductions from CET 1 capital and for the recognition of minority interests for banking organizations that are not Category I or II firms.<sup>34</sup> Specifically, the agencies should retain the 25% deduction threshold for deferred tax assets (DTAs), mortgage servicing assets (MSAs) and significant investments in unconsolidated financial institutions (UFIs). The agencies should also extend these deductions to all banks.

For non-significant investments in financial institutions (NSFI), the agencies should exempt index fund holdings of financial institutions. Index holdings are a means to gain broad market exposure rather than to gain exposure to financial institutions. Indirect holdings in financial institutions through an index fund are incidental to gaining broad exposure to the entire market.

Holdings in financial institutions arising from market-making activity should also be excluded. These do not represent investments in other financial institutions. Rather, these are short-term client driven transactions. A market making exemption would align with European implementation and mitigate the risk of equity market illiquidity should banks be limited in their ability to make markets in financial institutions or indices

##### ii. Repos / securities lending

The agencies should recognize netting and diversification benefits in the Collateral Haircuts Approach. The Collateral Haircuts Approach can result in uneconomic outcomes where similar collateral posted or received must be assumed to both increase and decrease in price.

##### iii. Secured lending

Remove security pledge transactions from the counterparty credit risk requirements where collateral is exchanged without title transfer, consistent with what is already allowed for cleared transactions. Collateral that is pledged by a bank without title transfer, at a third-party custodian,

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<sup>32</sup> FRB’s annual bank stress test showed that large banks are well positioned to weather a severe recession, while staying above minimum capital requirements and continuing to lend to households and businesses, (Jun. 27, 2025). <https://www.federalreserve.gov/news-events/pressreleases/bcreg20250627b.htm>

<sup>33</sup> Travis Hill, “Charting a New Course: Preliminary Thoughts on FDIC Policy Issues,” American Bar Association, Washington, D.C., January 10, 2025. <https://fdic.gov/news/speeches/2025/charting-new-course-preliminary-thoughts-fdic-policy-issues>

<sup>34</sup> Final Rule, Regulatory Capital Rule: Simplifications to the Capital Rule Pursuant to the Economic Growth and Regulatory Paperwork Reduction Act of 1996, 84 Fed. Reg. 35234 (July 22, 2019)



and without rehypothecation, does not result in credit risk to the pledging institution. The capital rules recognize that there is no credit risk when these fact patterns exist for cleared transactions and should do the same for secured lending activity.

#### **iv. Mortgages risk weights**

Align mortgage, CRE and retail risk weights with the international Basel III Standard. Risk weights on the Basel III standard are representative of the actual risk and provide granularity to differentiate between the risk profiles of the exposures.

The agencies should also use “current LTVs” that reflect borrowers’ current outstanding debt rather than “original LTVs” at origination. Current LTVs represent the actual risk of the position rather than a static and outdated view of the risk.

#### **v. Corporate risk weights**

The agencies should align risk weights for broker dealers to be consistent with those applicable to banks, especially if the broker dealer is subject to a Basel equivalent capital framework – such as for broker dealers that are subject to SEC requirements. U.S. rules have gold-plated the risk weights for broker dealers with no credit given to the regulatory oversight on these entities.

The agencies should not require that a corporate has a publicly traded security outstanding, in addition to being an investment grade, to qualify for the 65% risk weight. In addition, rather than applying one standard risk weight to all corporates, the agencies should differentiate risk weights by creditworthiness. They should also provide granularity to differentiate between investment grade and high yield counterparties, in alignment with prudent risk management.

#### **vi. Securitization**

See the Structured Finance Association’s EGRPRA comment letter for the industry’s views on securitization.<sup>35</sup>

#### **vii. Foreign bank definition under Regulation K**

The agencies should de-couple the definition of a foreign bank from Regulation K - 12 CFR 211.2. Regulation K defines a foreign bank as any company that meets 5 criteria, with the most problematic being “receives deposits to a substantial extent in the regular course of its business.” “Substantial extent” is not a defined term and introduces ambiguity that can lead to inconsistent capital treatment across firms. Further discussion with the industry is needed to determine an appropriate and workable standard that is clear and consistently applied.

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<sup>35</sup> See Structured Finance Association’s comment letter on EGRPRA, (Oct 3, 2025), <https://www.fdic.gov/federal-register-publications/structured-finance-association-michael-bright-rin-3064-za39.pdf>



### **viii. Standardized approach for counterparty credit risk (SA-CCR)**

#### **1. Remove alpha**

The agencies should amend SA-CCR to be more risk sensitive by, for example, removing the alpha 1.4x multiplier for all activity, at least in relation to the replacement cost that reflects balance sheet values that are certain. In addition, alpha—which was calibrated in 2005 assuming derivatives are unmargined—is outdated and should be revisited.

#### **2. Collateral recognition**

The agencies should improve collateral recognition through revision of the potential future exposure (PFE) multiplier formula. At present, there are diminishing marginal returns to adding additional collateral, making it impossible to reduce SA-CCR exposure at default (EAD) to zero, even with infinite collateral.

#### **3. Supervisory factors**

The agencies should revise the supervisory factors for the equities asset class to better reflect underlying asset volatilities, as alluded to in the preamble to the SA-CCR final rule. Equity supervisory factors, in particular, are not consistent with the empirical data and should be recalibrated.

#### **4. Netting**

The agencies should allow for both settle to market (STM) and collateralize to market (CTM) netting. STM and CTM netting should be allowed consistent with the legal, risk, and accounting framework. In addition, the agencies should allow banks to opt into CTM where STM is used, and vice versa.

#### **5. Decomposition non-linear index derivatives**

For the SA-CCR PFE calculation, the agencies should expand the ability of banks to decompose index derivatives into single name exposures to also apply to index options—in particular, plain vanilla options. This would allow better hedge recognition, particularly in instances where indices are similar but not identical.

#### **6. FX Hedge recognition**

The agencies should allow for better hedge recognition for FX by allowing banks to net by currency instead of currency pair and incorporating a correlation for the FX add-on aggregation.



## 7. Credit valuation adjustment (CVA)

The agencies should allow SA-CCR EAD to be reduced by CVA, similar to B3E. This would remove double counting of the same risk and be consistent with the application of SA-CCR under the Advanced Approach.

### ix. Credit risk mitigation

The agencies should appropriately recognize the various forms of credit risk mitigation, including the following:

The traditional and synthetic securitizations frameworks prevent recognition of valuable credit risk mitigation tools. Specifically, it requires accounting de-recognition for originated traditional securitizations and imposes operational constraints—such as the reservation of authority (RoA) and notional limits—on the use of credit-linked notes (CLNs) in originated synthetic transactions.

The agencies should eliminate the de-recognition requirement for originated traditional securitizations and allow CLNs to be used for originated synthetic securitizations without requiring RoA approval or imposing notional limits.

The agencies should remove or modify the “stay risk” element from the definition of a “collateral agreement” in 12 CFR 217.2 so that financial collateral held by an institution can potentially be recognized as a credit risk mitigant more broadly, provided all other criteria are met. The collateral recognition under the “Simple Approach” is too restrictive. In particular, the collateral agreement requirement inadvertently excludes the recognition of financial collateral for exposures where the banking organization’s exercise of rights under the agreement may be stayed. This requirement makes the Simple Approach unavailable for high quality loans and other contracts where a counterparty would have enforceable rights to collateral.

Furthermore, partial recognition should be given for foreign exchange (FX) mismatches when recognizing collateral under the “Simple Approach.” Full disallowance of collateral for any FX mismatch is misaligned with the legal agreement and prudent risk management generally.

The agencies should also recognize non-investment-grade instruments as financial collateral under the “Collateral Haircuts Approach.” This would reduce procyclicality given credit downgrades are most likely in stressed periods, better align capital with prudent risk management, and remove cliff effects in the capital framework.

### f. G-SIB

#### i. Recalibrate coefficients indexed to nominal GDP

The agencies should recalibrate coefficients using nominal GDP since 2015 to account for economic growth (*see pages 26 and 27*). This would remove double counting for capital markets activity across the framework and remove gold-plating relative to the international framework.



## ii. Short-term wholesale funding (STWF)

The agencies should adjust the STWF indicator to constitute only 20% of the systemic risk score. This change would restore balance in the framework as initially intended.

## iii. Equity exchange traded funds (ETFs)

The agencies should exclude equity ETFs from Interconnectedness, similar to bond ETFs. ETFs are not financial institutions and were likely intended to be included in the Interconnectedness exclusion.

## iv. Remove current exposure method (CEM)

The agencies should replace CEM with SA-CCR for Interconnectedness. This would align with the replacements of CEM in RWA and the Supplementary Leverage Ratio (SLR). Additionally, they should exclude the SA-CCR alpha factor from GSIB surcharge calculations in measuring derivative exposure.

## v. Derivatives

The agencies should remove the triple count of derivatives across Size, Interconnectedness and Complexity. This would remove relative bias against capital markets activities. Excluding the Principal model from Complexity and Interconnectedness would align with the current treatment for Agency model activities.

## vi. Repos

The agencies should remove the quadruple count of repo-style transactions across Size, Interconnectedness, Cross-Jurisdictional Activity, and STWF. This change would remove relative bias against capital markets activities.

## g. Market risk

The Agencies should consider developing a mechanism to review and exempt value at risk (VaR) back testing exceptions in periods of stress if the breach was not a result of a model shortcoming.

During the Covid pandemic, the Agencies provided relief to avoid outsized impacts to a banking organization's capital requirements arising from a pandemic-related "sudden and significant repricing of global financial markets" resulting in an increased number of VaR model back testing exceptions. These breaches tend to be procyclical thus exacerbating stressed conditions.

## h. Digital assets

The agencies should provide for regulatory certainty with respect to digital asset exposures. Regulation should not result in an effective prohibition or an overall cap on the amount of



activity. As President Trump’s Working Group on Digital Asset markets noted,<sup>36</sup> the agencies should “ensure that bank capital rules are aligned with the actual risks associated with digital assets, not simply the fact of their presence on a distributed ledger.”

Regulatory capital should be de-linked from the accounting classification if it would result in a capital deduction or an effective prohibition. Accounting should not disrupt the principle of technologically neutral – “same risk, same treatment.”

### III. Community Reinvestment Act (CRA)

The multiyear effort to modernize the CRA regulations led to the 2023 Rule, which the agencies are now in the process of rescinding. The proposed rescission follows a legal challenge alleging that the 2023 Rule exceeded the agencies’ statutory authority. ABA strongly supports repealing the 2023 Rule and replacing it with the 1995 framework. While the modernization effort was unsuccessful, it highlighted the strengths of the legacy rule as well as areas where targeted updates are needed.

Below we provide several recommendations for meaningfully improving the 1995 framework. These changes can be made through modest revisions to the CRA regulation, updates to the Interagency Questions and Answers (Interagency Q&A), and improvements to CRA-related processes. After the 1995 framework is reinstated, we also request that the agencies resume meeting with trade associations and bankers to discuss CRA topics and address banker questions. This dialogue will be especially important as more banks pursue a hybrid business strategy that combines online lending, traditional bank branches, and non-branch funding sources. It would promote consistency across the agencies and provide needed clarity for new CRA officers and agency staff following the recent wave of retirements among experienced bankers and regulators. It would also benefit community banks that do not have large compliance teams.

#### a. Performance tests

##### i. Size thresholds

The asset caps for the Small Bank and Intermediate Small Bank performance tests are too low and do not reflect the evolution of the banking sector following the establishment of the

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<sup>36</sup> President’s Working Group on Digital Assets. Strengthening American Leadership in Digital Financial Technology. 2025. <https://www.whitehouse.gov/wp-content/uploads/2025/07/Digital-Assets-Report-EO14178.pdf>. See also e.g., Joint Trades Letter to BCBS re: Cryptoasset Exposure Standards, Aug 2025, which recommends essential revisions to the Basel Committee’s cryptoasset exposure standard, noting the standard’s excessively conservative and overly punitive capital treatment, which is misaligned with actual risk. <https://www.gfma.org/wp-content/uploads/2025/08/bcbs-prudential-letter-final-public-version.pdf>



Intermediate Small Bank classification in 2005.<sup>37</sup> As a result, CRA performance tests that once reflected meaningful distinctions in size and capacity are now applied to institutions that were never intended to be subject to the full spectrum of CRA requirements.

In 2005, banks with up to \$250 million in assets qualified for evaluation under the Small Bank Test, while those with assets between \$250 million and \$1 billion qualified for the Intermediate Small Bank Test. At that time, these thresholds corresponded to the 73rd and 93rd percentiles of bank asset size, respectively. Today, those same percentiles align with approximately \$850 million and \$4.7 billion in assets. To maintain consistency with the original intent of the regulation, we recommend that the agencies update the CRA asset thresholds to reflect the current distribution of bank sizes. Under this approach, the Small Bank Test would apply to banks with up to \$850 million in assets, and the Intermediate Small Bank Test would apply to those with up to \$4.7 billion.

Following this initial adjustment, we recommend that the thresholds be indexed annually to nominal Gross Domestic Product (GDP) rather than the Consumer Price Index (*see pages 26 and 27*). Indexing to nominal GDP would ensure that the CRA asset classifications remain meaningful and appropriate as the economy grows and the banking sector evolves.

## ii. Specialized Lending and Strategic Plan Flexibility

Banks have evolved beyond the traditional branch-based model. As the economy has become increasingly digital, many institutions have diversified their business strategies. Some are pursuing hybrid models that maintain their existing branch networks for deposit-taking and local lending, while also offering specialized lending products outside their branch footprint. These niche products, such as equipment financing or veterinary practice loans, are often funded through brokered deposits or other non-branch-based sources and reflect many community banks' interest in meeting targeted credit needs as well as the business needs of the bank.

This evolution has created challenges under CRA's in/out ratio, which is a metric that examiners use to assess the proportion of loans made inside versus outside a bank's assessment area. The in/out ratio is intended to ensure that banks are helping to meet the credit needs of their communities and are not simply exporting local deposits for the purpose of making loans elsewhere. A skewed in/out ratio can result in a low CRA rating for banks that are market leaders in their assessment areas but also lend in a wider geography through specialized lending products.

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<sup>37</sup> The CRA regulation establishes three categories of performance tests, which are based on a bank's asset size. These thresholds are adjusted annually for inflation based on changes to the Consumer Price Index. The size classifications are as follows:

- Small Bank Test: Up to \$402M
- Intermediate Small Bank Test: \$402M - \$1.609B
- Large Bank Test: More than \$1.609B



It is important that the CRA regulatory framework not discourage innovation or new business strategies; banks must be free to adapt in order to remain competitive in the modern economy. For this reason, we urge the agencies to ensure that the strategic plan option remains a viable alternative for evaluating CRA performance, especially for community banks.<sup>38</sup> Regulators should take care not to discourage (directly or indirectly) banks from pursuing a strategic plan. Regulators should improve the strategic plan approval process to make the option more accessible. We recommend the following three enhancements.

First, streamline the strategic plan approval process. Regulators should reduce the time, burden, and red tape associated with developing a strategic plan. We support the OCC's recent announcement that it intends to simplify the strategic plan process for community banks and urge the FDIC and Federal Reserve to follow suit.<sup>39</sup>

Second, provide clearer guidance. The agencies should issue interagency guidance regarding how to draft a strategic plan, including examples of measurable goals. OCC Bulletin 2019-39, *Guidelines for Requesting Approval of a Strategic Plan*, is a helpful resource, but additional information issued on an interagency basis would support broader adoption of strategic plans. We also encourage the agencies to invite public comment on the guidance.

Third, clarify the role of public input. The banking agencies consider the public's involvement in formulating a bank's proposed strategic plan, the public's written comments on the plan, and any response by the bank. We request that the agencies clarify that a bank may prioritize feedback from those organizations that serve the geographies covered by the plan. The agencies should also clarify which topics are in scope and how public comments will be weighed. Further, the agencies should ensure that strategic plans do not become *de facto* community benefit agreements.

#### **b. Assessment areas**

The CRA regulation requires that a bank's assessment area consist of one or more metropolitan statistical areas or metropolitan divisions or one or more contiguous political subdivisions, such as counties, cities, or towns. Over the years, the agencies have adopted varying approaches

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<sup>38</sup> The CRA regulation permits banks to elect to have their CRA performance evaluated pursuant to a CRA strategic plan in lieu of the standard Small, Intermediate, or Large Bank tests. A CRA strategic plan must specify measurable CRA goals and must be developed with public input and receive regulatory approval. Strategic plans enable banks to customize their CRA responsibilities to better reflect their communities, product offerings, business strategy, and expertise.

<sup>39</sup> OCC News Release 2025-95 (October 6, 2025). <https://www.occ.gov/news-issuances/news-releases/2025/nr-occ-2025-95.html>



regarding full versus partial county assessment areas even though the regulation does not require banks to delineate assessment areas comprised of an entire county.

Some banks designate partial-county assessment areas due to the geographic characteristics of the areas where they operate—for example when the bank has a single branch on the edge of a large county or when it has a single branch in a county that includes a large city. Other banks delineate full county assessment areas to reduce redlining risk or because they feel pressured by examiners to do so even though full county delineations are not required by the rule.

To preserve flexibility that reflects a bank's capacity, business strategy, and the unique geographic features of its community, we request that the agencies revise the Interagency Q&A to affirm that partial-county delineations are permitted, provided that they do not reflect illegal discrimination or arbitrarily exclude low-and moderate-income (LMI) geographies. This clarification should also be included in the Interagency CRA Examination Procedures. We understand that some examiners view full county assessment areas as a more consistent standard for evaluating CRA performance. However, consistency must be balanced with assessment areas that reflect geographic realities and the communities that the bank can reasonably serve.

For banks that choose to delineate fully-county assessment areas, we request that the agencies revise the Interagency Examination Procedures and the Interagency Q&A to explain the performance context factors examiners will apply when the bank cannot reasonably serve the entire geography—for example, when a single branch is located on the county line, the county divided by a mountain range, or the county is exceptionally large.

### **c. Community development**

Determining whether loans and investments qualify for community development credit continues to be a challenge for banks. In addition, banks have encountered inconsistent examiner expectations regarding the documentation required to support positive CRA consideration of community development activities. Below, we recommend several steps the agencies can take to address these issues.

#### **i. Naturally occurring affordable housing (NOAH)**

We request that the agencies update the Interagency Q&A to define what qualifies as NOAH for CRA purposes. With only 20% - 25% of affordable rental housing in the U.S. receiving direct government subsidies, most affordable housing is naturally occurring. Yet, rising rents and limited supply are making it difficult for families to find affordable options. Banks want to support housing affordability, but inconsistent standards and unrealistic or excessive documentation requirements make it difficult to do so.



To encourage investment in NOAH, we recommend that the agencies specify that examiners will provide positive CRA consideration when the majority of units in a multifamily property do not exceed 30 percent of 80 percent of Area Median Income (AMI). This aligns with the housing goals for Fannie Mae and Freddie Mac, which include a goal for the number of units affordable by LMI families with incomes no greater than 80 percent of area median income. In high-cost areas designated by the Federal Housing Finance Agency (FHFA), we support extending CRA eligibility to units affordable to renters earning up to 100 percent to 120 percent of AMI. We also request that the agencies provide non-exclusive examples of documentation that banks can use to qualify NOAH for positive CRA consideration.

#### **ii. Pro rata credit**

We recommend that the agencies revise the Interagency Q&A to provide partial (pro rata) credit to all types of community development activities—not just those involving affordable housing. Current regulatory practices only recognize community development initiatives if they are targeted to LMI individuals or revitalize or stabilize disaster areas or underserved or distressed middle-income areas. This approach does not reflect the full spectrum of a bank's community development activities.

Interagency Q&A 12(g)(4)(iii) addresses this issue, but its application is limited to non-metropolitan, middle-income census tracts (if the community is in a county that is classified by the agencies as distressed or underserved, as published annually). Banks may receive credit for revitalization and stabilization in these areas, even if they cannot show that the activity will benefit LMI individuals or areas. While helpful, this Q&A leaves many banks without credit for similar efforts in metropolitan areas.

#### **iii. Credit for outstanding balances on prior period community development loans**

We recommend that the agencies revise the Interagency Q&A to provide positive CRA consideration for outstanding balances on community development loans. Currently, only community development investments are given prior period consideration. Providing positive CRA consideration for outstanding balances on community development loans will encourage banks to provide long-term financing that is often key to the success of community development initiatives. In many cases, longer-term loans have a greater community impact than short-term revolvers (depending on conditions) and should be recognized accordingly.

#### **iv. Financial literacy**

We recommend that the agencies revise the Interagency Q&A to provide that all financial education activities are eligible for positive CRA consideration, regardless of the income of the



recipients. Currently, credit is limited to programs that serve LMI individuals or schools where more than half of students qualify for free or reduced-price meals. This narrow standard overlooks the broader need for financial education across all communities.

Frequently, children from all income levels do not receive training at home regarding how to manage a checking account, distinguish between needs and wants, establish short-term and long-term financial goals, or determine the pros and cons of applying for a loan. In addition, requiring financial literacy initiatives to have a principal purpose of serving LMI individuals is inconsistent with school boundaries in many communities. Rural schools typically draw students from a wide geographic area, and many rural counties have only one high school. Moreover, some school districts in small cities and suburban areas intentionally draw their attendance maps so that the student population is economically diverse. These realities make it difficult to target financial education solely to LMI populations.

Banks also are important providers of financial education for adults. This may take the form of housing counseling, budgeting instruction, or programs to prevent elder financial exploitation. Today, a bank does not receive CRA consideration for making these presentations to organizations that do not qualify as having a community development purpose (e.g., Rotary Club, Lions Club, Chamber of Commerce, etc.). Senior citizens in all income brackets are at heightened risk of fraud and financial abuse and policymakers encourage banks to participate in programs to prevent financial exploitation. As such, these activities should receive CRA credit.

Banks also provide instruction pertaining to financial services innovation, such as information regarding merits of different types of payment processors or the use of digital wallets. Digital financial literacy is important for individuals from all income levels—not just those who are low income. As technology continues to reshape how individuals manage their money, CRA should recognize the value of helping consumers navigate digital tools safely and effectively.

#### **v. Community development financial institutions (CDFIs)**

Today, the banking agencies do not provide positive CRA consideration for activities conducted in conjunction with CDFIs unless those activities benefit the non-CDFI bank's assessment area(s) or the broader statewide or regional area that includes the bank's assessment area(s). This geographic limitation discourages banks from supporting high-impact CDFIs that operate outside their footprint—even when those CDFIs are serving deeply underserved communities.

We request that the agencies update the Interagency Q&A to provide that loans, investments, and services provided in connection with a Treasury-Department-certified CDFI will receive positive CRA consideration, regardless of location. This would align the CRA treatment of CDFI activities with the consideration already afforded to activities with Minority- or Women-Owned



Financial Institutions and Low-Income Credit Unions. Updating the Q&A in this regard would be a modest but meaningful step toward expanding access to capital in LMI communities nationwide.

#### **vi. Volunteer service**

Under current rules, community development services must meet the definition of community development and must be related to the provision of financial services. The Interagency Q&A explains that such services are limited to the provision of financial expertise, such as credit counseling, financial planning, or other types of financial education. In addition, services reflecting an employee's role at the bank, such as human resources, information technology or the provision of legal services, will receive positive CRA consideration.

These restrictions artificially limit a bank's options for addressing needs in its community. For example, banks are unable to receive positive CRA consideration for volunteer hours to construct a home sponsored by Habitat for Humanity even though the activity clearly supports affordable housing.

We request that the agencies revise the Interagency Q&A to provide positive CRA consideration for volunteer service performed by bank employees acting as representatives of the bank, as long as the service meets the definition of a qualifying community development activity. The activity would need not be limited to the provision of professional services. This approach would empower banks to deploy CRA resources in a manner that responds more effectively to local needs.

#### **vii. List or database of CRA-qualifying activities**

Some banks have been able to obtain feedback from their examiners as to whether a proposed loan, investment, or service will receive positive CRA consideration, while other banks have not. Whether an activity will receive CRA credit is one factor of many that banks consider when making community development lending and investment decisions. Providing certainty regarding CRA eligibility may increase the flow of capital for certain types of projects. The 2023 Rule incorporated this idea, and we believe that the agencies should integrate it into the 1995 framework.

This concept could take several forms, such as the illustrative list contemplated in the 2023 Rule. Alternatively, the FFIEC could establish and maintain a database of activities that have historically received CRA credit, are targeted to LMI populations, or are aligned with government-supported programs and policies that advance CRA-related goals. Any such resource should be cumulative, searchable, and organized by topic (rather than date). It could also identify CRA-qualified nonprofit organizations.



The list or database should be easily understood by frontline personnel who do not specialize in compliance, such as branch managers, commercial lenders, and community development officers. In addition, the list should be updated regularly.

### **viii. Pre-clearance process**

While an illustrative list or CRA database could address uncertainty and inconsistency regarding what qualifies for CRA consideration, it would not address new or innovative activities. For this reason, we recommend that the agencies establish a process through which banks may request advance confirmation that a community development activity will receive positive CRA consideration. This mechanism would help provide the certainty that banks need when considering new and innovative activities. This concept was a widely-supported feature of the 2023 Rule, and we recommend that the agencies incorporate it into the 1995 framework. As we have noted previously, the timeliness of the regulatory response will be critical to the success of this process.

### **ix. Classification of small business loans**

Today, a loan that meets the definition of a small business loan must be reported as such. A bank may not choose to report it as a community development loan even if it has a community development purpose. As a result, community development loans are being undercounted. We request that the agencies provide banks with the option of classifying small business loans with a community development purpose as a community development loan or as a loan under the general lending test.

#### **d. Small business lending**

Banks have multiple reporting obligations with respect to small business lending. They must report information for purposes of the Call Report, CRA, and the Consumer Financial Protection Bureau's (CFPB's) small business lending data collection rule (1071 Rule). The 1071 Rule

is subject to litigation and has been delayed while the CFPB reproposes the rule. Once a new rulemaking is complete, it is possible that banks will be required to maintain two reporting systems for small business lending—one for CRA and Call Report purposes and another for 1071 reporting—because the data elements and reporting thresholds may differ. Dual reporting requirements for the same loans will be inefficient, costly, and operationally burdensome.

While some interested parties have suggested aligning CRA reporting with the 1071 Rule, doing so could create gaps in CRA performance data or require banks to track certain small business loans separately. For example, loan purchases are not included in the 1071 rule issued in 2023, potentially requiring banks to track loan purchases separately or risk losing CRA credit.



Similarly, loan renewals, which are counted for CRA purposes, are excluded from the 2023 final rule for 1071. Further, even if CRA and 1071 reporting were to be aligned, banks would still have to report small business lending for Call Report purposes.

We urge the agencies to carefully consider the challenges posed by dual reporting regimes and to revisit both the CRA small business lending thresholds and reporting requirements once the CFPB finalizes its revised 1071 rule. Thoughtful coordination across regulatory frameworks is essential to reducing unnecessary burden.

#### e. Process issues

We offer several process-oriented improvements to CRA examination and supervision. These issues were among the initial concerns that ABA and other stakeholders identified as priorities for agency action during the initial CRA modernization effort in 2017.<sup>40</sup> However, the modernization initiative, which culminated in the 2023 Rule, evolved into a sweeping overhaul that diverged from the initiative’s original intent and left many of these process concerns unaddressed.

##### i. Bulletin boards and informal interpretations

Our members (particularly community banks) have encountered situations where examiners cite internal agency “guidance” that has not been made public. This guidance typically involves informal interpretations of various aspects of CRA compliance that agency staff has posted to internal agency “bulletin boards.” While these online discussions may not be intended to represent official agency positions, some examiners are treating them as such. Banks learn about the internal guidance during an examination and are not provided access to these internal agency documents. Informal, internal agency interpretations should not create official supervisory policy. If internal guidance does represent official policy, it should be made public. Regulators should review these postings for potential inclusion in future updates to the Interagency Examination Procedures and/or the Interagency Q&A.

##### ii. Performance context

In addition to possessing technical expertise, CRA examiners must apply sound judgment to assess a bank’s qualitative impact and performance context. Some banks—particularly community banks—have encountered CRA examiners that disregarded the bank’s performance context in favor of a rigid, quantitative analysis of the bank’s CRA performance. This may be partly because community bank examiners often conduct multiple types of examinations (not just

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<sup>40</sup> See, American Bankers Association, *CRA Modernization: Meeting Community Needs and Increasing Transparency* (Dec. 2017).



CRA), whereas larger banks are typically evaluated by CRA specialists with deeper expertise. When examiners do consider performance context, exam reports often do not describe how that information informed the bank's final rating. This lack of transparency may contribute to the perception of inconsistency in CRA examinations.

To address this issue, the agencies should require examiners to include a performance context analysis in the exam report that clearly explains how performance context factors affected the bank's CRA rating. Greater transparency will help banks and stakeholders understand the rationale behind CRA ratings and foster trust in the CRA examination process. We also urge the agencies to update the Interagency Q&A and/or the Interagency CRA Examination Procedures to provide a more detailed explanation of how examiners apply performance context.

### **iii. Reclassification of census tracts**

Census tract income classifications often change as demographic data is updated.<sup>41</sup> These reclassifications can affect whether a bank is deemed to adequately serve its assessment area. To date, the banking agencies have not explained how examiners will assess CRA performance in light of census tract changes. Banks should not be penalized by the reclassification of an LMI census tract to a middle income tract. Likewise, banks should not be expected to reallocate branch distributions in response to dramatic swings in census tract designations.

We recommend that the agencies update the Interagency Q&A and/or the Interagency Examination Procedures to specify that examiners should consider performance context in these situations. This includes evaluating the bank's ability to reach the LMI demographic based on its existing branch network and other delivery channels. For community development activities, banks should receive positive CRA consideration if a census tract is designated as LMI at the time underwriting began, even if the census tract is reclassified before the loan closes. Community development loans can take years to identify, underwrite, and close; CRA credit should reflect the status of a census tract at the time of the bank's commitment.

### **iv. Documentation**

There is inconsistency across and within agencies regarding the documentation necessary to receive positive CRA consideration for certain activities, such as partnerships with nonprofit organizations and financing affordable rental housing. We urge the agencies to update the

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<sup>41</sup> In 2012, the FFIEC began to utilize data from the Census Bureau's American Community Survey to determine whether census tracts should be designated as low-and moderate-income for purposes of assessing a bank's CRA compliance. The following year, the Office of Management and Budget (OMB) published a new set of definitions for Metropolitan Statistical Areas (MSAs) and Metropolitan Divisions (MDs). Many census tracts previously designated as low-and moderate-income have been reclassified as middle or upper income due to new data from the American Community Survey as well as changes to OMB's new definitions for MSAs and MDs.



Interagency Q&A to provide examples of sufficient documentation. ABA would welcome the opportunity to collaborate with the agencies on this project.

**f. Miscellaneous**

**i. Public file**

The CRA public file requirement should be aligned with the digital age and reduce unnecessary burden. Much of the information required to be included in the public file, such as branch locations, street addresses, services provided, and hours of operation, is available on the bank's website. Requiring banks to maintain this information in the public file is inefficient and does not enhance the public's access to information. Therefore, we request that the agencies amend the CRA regulation to streamline the information that banks are required to provide in the public file. In addition, the agencies should provide banks with the option of providing a link to the public section of its most recent CRA performance evaluation instead of a copy of the report. We also recommend that regulators provide banks the option of providing the public file in either paper or digital format.

**ii. Reg H/Public welfare investments**

The Federal Reserve's regulations governing public welfare investments (PWI's) are inconsistent with the CRA regulation and the Interagency Q&A. These discrepancies harm communities by making it more difficult for state member banks to engage in the full spectrum of CRA-eligible activities.

Regulation H permits state member banks to invest in PWIs if such investments involve six narrow categories of activities.<sup>42</sup> A bank must obtain approval from the Board of Governors (the Board) prior to investing in PWIs outside of these six categories, even though such investments receive positive consideration under the CRA regulations. Importantly, the six categories of permissible activities are more limited in scope than community development investments that receive credit under CRA.<sup>43</sup> This creates a situation where banks would receive CRA credit per

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<sup>42</sup> The six categories include certain residential property activities, nonresidential property activities, investments in small businesses, job training programs, job creation, and the provision of technical assistance. Notably, Regulation H requires that certain PWI investments be located exclusively in an LMI area. This means that the Board must approve certain categories of PWI investments in middle-income areas, even if those investments are for the exclusive benefit of LMI individuals. See corresponding chart for more information.

<sup>43</sup> Banks receive CRA credit for investments that revitalize or stabilize LMI geographies, disaster areas, or distressed or underserved nonmetropolitan middle-income areas. However, these activities are not permissible PWIs for state member banks without prior approval.



the CRA regulations, but they are not authorized to make such investments under the PWI rules. These restrictions do not apply to banks supervised by the OCC or the FDIC.

The Federal Reserve should encourage banks to pursue investments that are responsive to community needs rather than limiting CRA investments to activities that are not subject to a lengthy approval process (e.g., MBS). Not all banks have the expertise or legal budget to shepherd a PWI request through Federal Reserve staff and a vote by the Board. Accordingly, we recommend that the Federal Reserve revise Regulation H to clarify that if an investment is a qualified investment under CRA regulations, then such investment also qualifies as a PWI that does not require prior approval from the Board. In lieu of Board approval, banks could be required to provide after-the-fact notice, consistent with the PWI notice requirement for national and state nonmember banks.

### iii. Table of contents

As the agencies update the Interagency Q&A, we recommend that they add a table of contents with links to each section of the document. This would make the Q&A more user friendly by reducing the amount of time that users must scroll through the document to locate the information that they are seeking.

## IV. Indexing Asset Thresholds

For decades, many regulatory thresholds have stayed fixed in nominal terms, even as the economy has grown. These thresholds were typically set during very different economic conditions and generally are meant to tailor regulations so that institutions are not unduly burdened by heightened regulatory requirements. However, by setting and forgetting these regulatory thresholds, they do not reflect changes in the banking sector, much less in the larger economic environment. As a result, thresholds that once reflected meaningful distinctions in size, complexity, or risk now capture institutions whose risk profiles do not reflect the regulatory requirements tied to the corresponding regulatory thresholds. Additionally, many if not all of the regulatory thresholds in place today serve as artificial barriers to organic growth.

For example, heightened audit requirements established by the FDIC kick in when a bank's assets reach \$500 million. When this threshold was set in 1993, the more stringent requirements applied to only 7 percent of banks. Today, it applies to 41 percent. Dozens of thresholds, from stress testing to resolution planning, have drifted the same way.



This regulatory “drift” creates three problems:

**1. Burdens institutions never meant to be captured.**

Over time, economic growth and inflation erode the real value of thresholds, pulling more institutions into regulatory regimes that were never intended to apply to them. Banks with limited complexity or risk profiles may be forced to shoulder costs and reporting burdens designed for much larger peers.

**2. Discourages organic growth.**

Institutions manage their balance sheets defensively to avoid crossing arbitrary thresholds. In some cases, this distortion discourages organic growth and instead encourages consolidation as the only viable means to absorb new regulatory burdens.

**3. Dilutes regulatory resources.**

An expanding pool of covered banks beyond the intended scope dilutes regulatory efforts and the ability of agencies to focus on the largest sources of risk. These outcomes run counter to the policy objectives Congress and regulators have set.

The solution is indexing. ABA recommends,<sup>44</sup> *after a one-time adjustment to correct for past inaction, linking asset-based thresholds to nominal GDP*, which reflects the size of the economy and the scale of the banking sector. Indexing is a low-cost, high-impact reform. It improves transparency, reduces arbitrary burden, and allows regulators to focus where the risk really is. In addition, the agencies should eliminate cliff effects by providing transition periods between heightened regulatory requirements, which in turn will serve as on-ramps to growth—instead of disincentivizing growth or causing institutions to manage below thresholds. Indexing regulatory thresholds for nominal GDP and including transition periods when institutions cross such thresholds will ensure a durable framework that is reflective of economic realities.

We applaud the FDIC’s proposal to index some of its thresholds and urge other policy makers to prioritize the issue.<sup>45</sup>

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<sup>44</sup> See Joint ABA and State Bankers Associations Letter to the FDIC on Adjusting and Indexing Certain Regulatory Thresholds (Sep. 24, 2025). <https://www.aba.com/-/media/documents/comment-letter/jointltdicregthresholds20250924.pdf>

<sup>45</sup> Notice of Proposed Rulemaking, Adjusting and Indexing Certain Regulatory Thresholds, 90 Fed. Reg. 35449 (Jul. 28, 2025).



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## V. Conclusion

ABA looks forward to working with the Agencies to find ways to reduce regulatory burden consistent with the shared goal of ensuring that bank operations are conducted in a safe and sound manner while enhancing the ability of banks to serve their customers. If you have any questions about the content of, or issues addressed in this letter please contact the undersigned, Tyler Mondres, at (202) 663- 5353. Sincerely,

A handwritten signature in black ink, appearing to read "TJM".

Tyler Mondres  
Senior Director, Prudential Regulation  
American Bankers Association

Federal Financial Institutions Examination Council



# Consolidated Reports of Condition and Income for a Bank with Domestic Offices Only and Total Assets Less than \$5 Billion—FFIEC 051

## Report at the close of business December 31, 2025

This report is required by law: 12 U.S.C. § 324 (State member banks); 12 U.S.C. § 1817 (State nonmember banks); 12 U.S.C. § 161 (National banks); and 12 U.S.C. § 1464 (Savings associations).

Unless the context indicates otherwise, the term "bank" in this report form refers to both banks and savings associations.

**NOTE:** Each bank's board of directors and senior management are responsible for establishing and maintaining an effective system of internal control, including controls over the Reports of Condition and Income. The Reports of Condition and Income are to be prepared in accordance with federal regulatory authority instructions. The Reports of Condition and Income must be signed by the Chief Financial Officer (CFO) of the reporting bank (or by the individual performing an equivalent function) and attested to by not less than two directors (trustees) for state nonmember banks and three directors for state member banks, national banks, and savings associations.

I, the undersigned CFO (or equivalent) of the named bank, attest that the Reports of Condition and Income (including the supporting

(20251231)

(RCON 9999)

This report form is to be filed by banks with domestic offices only and total assets less than \$5 billion, except such banks that (1) are advanced approaches institutions or are subject to Category III capital standards for regulatory capital purposes, (2) are large or highly complex institutions for deposit insurance assessment purposes, or (3) have elected, or have been required by their primary federal regulator, to file the FFIEC 041.

schedules) for this report date have been prepared in conformance with the instructions issued by the appropriate Federal regulatory authority and are true and correct to the best of my knowledge and belief.

We, the undersigned directors (trustees), attest to the correctness of the Reports of Condition and Income (including the supporting schedules) for this report date and declare that the Reports of Condition and Income have been examined by us and to the best of our knowledge and belief have been prepared in conformance with the instructions issued by the appropriate Federal regulatory authority and are true and correct.

\_\_\_\_\_  
Director (Trustee)

\_\_\_\_\_  
Director (Trustee)

\_\_\_\_\_  
Director (Trustee)

\_\_\_\_\_  
Signature of Chief Financial Officer (or Equivalent)

\_\_\_\_\_  
Date of Signature

## Submission of Reports

Each bank must file its Reports of Condition and Income (Call Report) data by either:

- Using computer software to prepare its Call Report and then submitting the report data directly to the FFIEC's Central Data Repository (CDR), an Internet-based system for data collection (<https://cdr.ffiec.gov/cdr/>), or
- Completing its Call Report in paper form and arranging with a software vendor or another party to convert the data into the electronic format that can be processed by the CDR. The software vendor or other party then must electronically submit the bank's data file to the CDR.

For technical assistance with submissions to the CDR, please contact the CDR Help Desk by telephone at (888) CDR-3111, by fax at (703) 774-3946, or by e-mail at [cdr.help@cdr.ffiec.gov](mailto:cdr.help@cdr.ffiec.gov).

FDIC Certificate Number   
(RSSD 9050)

To fulfill the signature and attestation requirement for the Reports of Condition and Income for this report date, attach your bank's completed signature page (or a photocopy or a computer generated version of this page) to the hard-copy record of the data file submitted to the CDR that your bank must place in its files.

The appearance of your bank's hard-copy record of the submitted data file need not match exactly the appearance of the FFIEC's sample report forms, but should show at least the caption of each Call Report item and the reported amount.

\_\_\_\_\_  
Legal Title of Bank (RSSD 9017)

\_\_\_\_\_  
City (RSSD 9130)

\_\_\_\_\_  
State Abbreviation (RSSD 9200) Zip Code (RSSD 9220)

\_\_\_\_\_  
Legal Entity Identifier (LEI)

\_\_\_\_\_  
(Report only if your institution already has an LEI.) (RCON 9224)

# Consolidated Reports of Condition and Income for a Bank with Domestic Offices Only and Total Assets Less than \$5 Billion

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For information or assistance, national banks, state nonmember banks, and savings associations should contact the FDIC's Data Collection and Analysis Section, 550 17th Street, NW, Washington, DC 20429, toll free on (800) 688-FDIC(3342), Monday through Friday between 8:00 a.m. and 5:00 p.m., Eastern Time. State member banks should contact their Federal Reserve District Bank.

## Contact Information for the Reports of Condition and Income

To facilitate communication between the Agencies and the bank concerning the Reports of Condition and Income, please provide contact information for (1) the Chief Financial Officer (or equivalent) of the bank signing the reports for this quarter, and (2) the person at the bank—other than the Chief Financial Officer (or equivalent)—to whom questions about the reports should be directed. If the Chief Financial Officer (or equivalent) is the primary contact for questions about the reports, please provide contact information for another person at the bank who will serve as a secondary contact for communications between the Agencies and the bank concerning the Reports of Condition and Income. Enter “none” for the contact’s e-mail address or fax number if not available. Contact information for the Reports of Condition and Income is for the confidential use of the Agencies and will not be released to the public.

### Chief Financial Officer (or Equivalent) Signing the Reports

---

Name (TEXT C490)

---

Title (TEXT C491)

---

E-mail Address (TEXT C492)

---

Area Code / Phone Number / Extension (TEXT C493)

---

Area Code / FAX Number (TEXT C494)

### Other Person to Whom Questions about the Reports Should be Directed

---

Name (TEXT C495)

---

Title (TEXT C496)

---

E-mail Address (TEXT 4086)

---

Area Code / Phone Number / Extension (TEXT 8902)

---

Area Code / FAX Number (TEXT 9116)

## Chief Executive Officer Contact Information

This information is being requested so the Agencies can distribute notifications about policy initiatives, deposit insurance assessments, and other matters directly to the Chief Executive Officers of reporting institutions. Notifications about other matters may include emergency notifications that may or may not also be sent to the institution’s emergency contacts listed below. Please provide contact information for the Chief Executive Officer of the reporting institution. Enter “none” for the Chief Executive Officer’s e-mail address or fax number if not available. Chief Executive Officer contact information is for the confidential use of the Agencies and will not be released to the public.

### Chief Executive Officer

---

Name (TEXT FT42)

---

Area Code / Phone Number / Extension (TEXT FT43)

---

E-mail Address (TEXT FT44)

---

Area Code / FAX Number (TEXT FT45)

## Emergency Contact Information

This information is being requested so the Agencies can distribute critical, time-sensitive information to emergency contacts at banks. Please provide primary contact information for a senior official of the bank who has decision-making authority. Also provide information for a secondary contact if available. Enter “none” for the contact’s e-mail address or fax number if not available. Emergency contact information is for the confidential use of the Agencies and will not be released to the public.

### Primary Contact

---

Name (TEXT C366)

---

Title (TEXT C367)

---

E-mail Address (TEXT C368)

---

Area Code / Phone Number / Extension (TEXT C369)

---

Area Code / FAX Number (TEXT C370)

### Secondary Contact

---

Name (TEXT C371)

---

Title (TEXT C372)

---

E-mail Address (TEXT C373)

---

Area Code / Phone Number / Extension (TEXT C374)

---

Area Code / FAX Number (TEXT C375)

## USA PATRIOT Act Section 314(a) Anti-Money Laundering Contact Information

This information is being requested to identify points-of-contact who are in charge of your bank's USA PATRIOT Act Section 314(a) information requests. Bank personnel listed could be contacted by law enforcement officers or the Financial Crimes Enforcement Network (FinCEN) for additional information related to specific Section 314(a) search requests or other anti-terrorist financing and anti-money-laundering matters. Communications sent by FinCEN to the bank for purposes other than Section 314(a) notifications will state the intended purpose and should be directed to the appropriate bank personnel for review. Any disclosure of customer records to law enforcement officers or FinCEN must be done in compliance with applicable law, including the Right to Financial Privacy Act (12 U.S.C. 3401 et seq.).

Please provide information for a primary and secondary contact. Information for a third and fourth contact may be provided at the bank's option. Enter "none" for the contact's e-mail address if not available. This contact information is for the confidential use of the Agencies, FinCEN, and law enforcement officers and will not be released to the public.

### Primary Contact

---

Name (TEXT C437)

---

Title (TEXT C438)

---

E-mail Address (TEXT C439)

---

Area Code / Phone Number / Extension (TEXT C440)

### Secondary Contact

---

Name (TEXT C442)

---

Title (TEXT C443)

---

E-mail Address (TEXT C444)

---

Area Code / Phone Number / Extension (TEXT C445)

### Third Contact

---

Name (TEXT C870)

---

Title (TEXT C871)

---

E-mail Address (TEXT C872)

---

Area Code / Phone Number / Extension (TEXT C873)

### Fourth Contact

---

Name (TEXT C875)

---

Title (TEXT C876)

---

E-mail Address (TEXT C877)

---

Area Code / Phone Number / Extension (TEXT C878)

# Consolidated Report of Income for the period January 1, 2025–December 31, 2025

## Schedule RI—Income Statement

|  | Dollar Amounts in Thousands | RIAD | Amount     |
|--|-----------------------------|------|------------|
| 1. Interest income:  |                             |      |            |
| a. Interest and fee income on loans:   |                             |      |            |
| (1) Loans secured by real estate:  |                             |      |            |
| (a) Loans secured by 1–4 family residential properties .....   | 4435                        |      | 1.a.(1)(a) |
| (b) All other loans secured by real estate .....   | 4436                        |      | 1.a.(1)(b) |
| (2) Commercial and industrial loans .....  | 4012                        |      | 1.a.(2)    |
| (3) Loans to individuals for household, family, and other personal expenditures:   |                             |      |            |
| (a) Credit cards .....   | B485                        |      | 1.a.(3)(a) |
| (b) Other (includes revolving credit plans other than credit cards, automobile loans, and other consumer loans) .....                            | B486                        |      | 1.a.(3)(b) |
| (4) Not applicable   |                             |      |            |
| (5) All other loans <sup>1</sup> .....   | 4058                        |      | 1.a.(5)    |
| (6) Total interest and fee income on loans (sum of items 1.a.(1)(a) through 1.a.(5)) .....   | 4010                        |      | 1.a.(6)    |
| b. Income from lease financing receivables .....   | 4065                        |      | 1.b.       |
| c. Interest income on balances due from depository institutions <sup>2</sup> .....   | 4115                        |      | 1.c.       |
| d. Interest and dividend income on securities:   |                             |      |            |
| (1) U.S. Treasury securities and U.S. Government agency obligations<br>(excluding mortgage-backed securities) .....                              | B488                        |      | 1.d.(1)    |
| (2) Mortgage-backed securities .....   | B489                        |      | 1.d.(2)    |
| (3) All other securities (includes securities issued by states and political subdivisions in the U.S.) .....                                     | 4060                        |      | 1.d.(3)    |
| e. Not applicable  |                             |      |            |
| f. Interest income on federal funds sold and securities purchased under agreements to resell .....   | 4020                        |      | 1.f.       |
| g. Other interest income .....   | 4518                        |      | 1.g.       |
| h. Total interest income (sum of items 1.a.(6) through 1.g) .....  | 4107                        |      | 1.h.       |
| 2. Interest expense:   |                             |      |            |
| a. Interest on deposits:   |                             |      |            |
| (1) Transaction accounts (interest-bearing demand deposits, NOW accounts, ATS accounts, and telephone and preauthorized transfer accounts) ..... | 4508                        |      | 2.a.(1)    |
| (2) Nontransaction accounts:   |                             |      |            |
| (a) Savings deposits ( <i>includes MMDAs</i> ) .....   | 0093                        |      | 2.a.(2)(a) |
| (b) Time deposits of \$250,000 or less .....   | HK03                        |      | 2.a.(2)(b) |
| (c) Time deposits of more than \$250,000 .....   | HK04                        |      | 2.a.(2)(c) |
| b. Expense of federal funds purchased and securities sold under agreements to repurchase .....   | 4180                        |      | 2.b.       |
| c. Other interest expense .....  | GW44                        |      | 2.c.       |
| d. Not applicable  |                             |      |            |
| e. Total interest expense (sum of items 2.a through 2.c) .....   | 4073                        |      | 2.e.       |
| 3. Net interest income (item 1.h minus 2.e) .....  | 4074                        |      | 3.         |
| 4. Provisions for credit losses <sup>3</sup> .....   | JJ33                        |      | 4.         |

1. Includes interest and fee income on "Loans to depository institutions and acceptances of other banks," "Loans to finance agricultural production and other loans to farmers," "Obligations (other than securities and leases) of states and political subdivisions in the U.S.," and "Loans to nondepository financial institutions and other loans."

2. Includes interest income on time certificates of deposit not held for trading.

3. Institutions should report in item 4 the provisions for credit losses on all financial assets and off-balance-sheet credit exposures.

## Schedule RI—Continued

|   | Dollar Amounts in Thousands | Year-to-date |         |
|---|-----------------------------|--------------|---------|
|   |                             | RIAD         | Amount  |
| 5. Noninterest income:  |                             |              |         |
| a. Income from fiduciary activities <sup>1</sup> .....  | 4070                        |              | 5.a.    |
| b. Service charges on deposit accounts .....  | 4080                        |              | 5.b.    |
| c. Not applicable .....   |                             |              |         |
| d. Income from securities-related and insurance activities:   |                             |              |         |
| (1) Fees and commissions from securities brokerage, investment banking, advisory, and underwriting activities .....   | HT73                        |              | 5.d.(1) |
| (2) Income from insurance activities <sup>2</sup> .....   | HT74                        |              | 5.d.(2) |
| e. Not applicable .....   | B492                        |              | 5. f.   |
| f. Net servicing fees .....   |                             |              | 5. i.   |
| g. and h. Not applicable .....  |                             |              | 5. j.   |
| i. Net gains (losses) on sales of loans and leases .....  | 5416                        |              | 5.k.    |
| j. Net gains (losses) on sales of other real estate owned .....   | 5415                        |              | 5.l.    |
| k. Net gains (losses) on sales of other assets <sup>3</sup> .....   | B496                        |              | 5.m.    |
| l. Other noninterest income* .....  | B497                        |              | 6.a.    |
| m. Total noninterest income (sum of items 5.a through 5.l) .....  | 4079                        |              | 6.b.    |
| 6. a. Realized gains (losses) on held-to-maturity securities .....  | 3521                        |              | 7.a.    |
| b. Realized gains (losses) on available-for-sale debt securities .....  | 3196                        |              |         |
| 7. Noninterest expense:   |                             |              |         |
| a. Salaries and employee benefits .....   | 4135                        |              | 7.b.    |
| b. Expenses of premises and fixed assets (net of rental income)<br>(excluding salaries and employee benefits and mortgage interest) .....   |                             |              | 7.c.(1) |
| c. (1) Goodwill impairment losses .....   | 4217                        |              | 7.c.(2) |
| (2) Amortization expense and impairment losses for other intangible assets .....  | C216                        |              | 7.d.    |
| d. Other noninterest expense* .....   | C232                        |              | 7.e.    |
| e. Total noninterest expense (sum of items 7.a through 7.d) .....   | 4093                        |              |         |
| 8. a. Income (loss) before change in net unrealized holding gains (losses) on<br>equity securities not held for trading, applicable income taxes, and discontinued<br>operations (item 3 plus or minus items 4, 5.m, 6.a, 6.b, and 7.e) ..... | HT69                        |              | 8.a.    |
| b. Change in net unrealized holding gains (losses) on equity<br>securities not held for trading <sup>4</sup> .....  | HT70                        |              | 8.b.    |
| c. Income (loss) before applicable income taxes and discontinued<br>operations (sum of items 8.a and 8.b) .....   | 4301                        |              | 8.c.    |
| 9. Applicable income taxes (on item 8.c) .....  | 4302                        |              | 9.      |
| 10. Income (loss) before discontinued operations (item 8.c minus item 9) .....  | 4300                        |              | 10.     |
| 11. Discontinued operations, net of applicable income taxes* .....  | FT28                        |              | 11.     |
| 12. Net income (loss) attributable to bank and noncontrolling (minority)<br>interests (sum of items 10 and 11) .....  | G104                        |              | 12.     |
| 13. LESS: Net income (loss) attributable to noncontrolling (minority) interests<br>(if net income, report as a positive value; if net loss, report as a<br>negative value) .....  | G103                        |              | 13.     |
| 14. Net income (loss) attributable to bank (item 12 minus item 13) .....  | 4340                        |              | 14.     |

\* Describe on Schedule RI-E—Explanations.

1. For banks required to complete Schedule RC-T, items 14 through 22, income from fiduciary activities reported in Schedule RI, item 5.a, must equal the amount reported in Schedule RC-T, item 22.
2. Includes underwriting income from insurance and reinsurance activities.
3. Exclude net gains (losses) on sales of trading assets and held-to-maturity and available-for-sale debt securities.
4. Item 8.b is to be completed by all institutions. See the instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.

## Schedule RI—Continued

### Memoranda

|  | Year-to-date |        |
|--|--------------|--------|
|  | RIAD         | Amount |
| 1. and 2. Not applicable   |              |        |
| 3. Income on tax-exempt loans and leases to states and political subdivisions in the U.S.<br>(included in Schedule RI, items 1.a and 1.b) .....  | 4313         |        |
| 4. Income on tax-exempt securities issued by states and political subdivisions in the U.S.<br>(included in Schedule RI, item 1.d.(3)) .....  | 4507         |        |
| 5. Number of full-time equivalent employees at end of current period<br>(round to nearest whole number) .....  | 4150         | Number |
| <i>Memorandum item 6 is to be completed by:<sup>1</sup></i>  |              |        |
| • <i>banks with \$300 million or more in total assets, and</i>   |              |        |
| • <i>banks with less than \$300 million in total assets that have loans to finance agricultural production and other loans to farmers (Schedule RC-C, Part I, item 3) exceeding 5 percent of total loans</i>                     |              |        |
| 6. Interest and fee income on loans to finance agricultural production and other loans to farmers<br>(included in Schedule RI, item 1.a.(5)) .....   | RIAD         | Amount |
| 7. If the reporting institution has applied pushdown accounting this calendar year, report the date of the institution's acquisition (see instructions) <sup>2</sup> .....   | RIAD         | Date   |
| 8. through 10. Not applicable  | 9106         |        |
| 11. Does the reporting bank have a Subchapter S election in effect for federal income tax purposes for the current tax year?.....  | RIAD         | Yes    |
| 12. through 14. Not applicable   | A530         | No     |
| <i>Memorandum item 15 is to be completed annually in the December report only by institutions with \$1 billion or more in total assets<sup>1</sup> that answered "Yes" to Schedule RC-E, Memorandum item 5.</i>                  |              |        |
| 15. Components of service charges on deposit accounts<br>(sum of Memorandum items 15.a through 15.d must equal Schedule RI, item 5.b):   |              |        |
| a. Consumer overdraft-related service charges levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use .....            | RIAD         | Amount |
| b. Consumer account periodic maintenance charges levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use .....         | H032         |        |
| c. Consumer customer automated teller machine (ATM) fees levied on those transaction account and nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use ..... | H033         |        |
| d. All other service charges on deposit accounts .....   | H034         |        |
|  | H035         |        |

1. The asset-size tests and the 5 percent of total loans test are based on the total assets and total loans reported on the June 30, 2024, Report of Condition.

2. Report the date in YYYYMMDD format. For example, a bank acquired on March 1, 2025, would report 20250301.

## Schedule RI-A—Changes in Bank Equity Capital

|   | Dollar Amounts in Thousands | RIAD | Amount |     |
|---|-----------------------------|------|--------|-----|
| 1. Total bank equity capital most recently reported for the <i>December 31, 2024, Reports of Condition and Income</i> (i.e., after adjustments from amended Reports of Income)..... |                             | 3217 |        | 1.  |
| 2. Cumulative effect of changes in accounting principles and corrections of material accounting errors* .....   |                             | B507 |        | 2.  |
| 3. Balance end of previous calendar year as restated (sum of items 1 and 2).....  |                             | B508 |        | 3.  |
| 4. Net income (loss) attributable to bank (must equal Schedule RI, item 14).....  |                             | 4340 |        | 4.  |
| 5. Sale, conversion, acquisition, or retirement of capital stock, net<br>(excluding treasury stock transactions) .....  |                             | B509 |        | 5.  |
| 6. Treasury stock transactions, net .....   |                             | B510 |        | 6.  |
| 7. Changes incident to business combinations, net .....   |                             | 4356 |        | 7.  |
| 8. LESS: Cash dividends declared on preferred stock .....   |                             | 4470 |        | 8.  |
| 9. LESS: Cash dividends declared on common stock .....  |                             | 4460 |        | 9.  |
| 10. Other comprehensive income <sup>1</sup> .....   |                             | B511 |        | 10. |
| 11. Other transactions with stockholders (including a parent holding company)*<br>(not included in items 5, 6, 8, or 9 above) .....   |                             | 4415 |        | 11. |
| 12. Total bank equity capital end of current period (sum of items 3 through 11)<br>(must equal Schedule RC, item 27.a) .....  |                             | 3210 |        | 12. |

\* Describe on Schedule RI-E—Explanations.

1. Includes, but is not limited to, changes in net unrealized holding gains (losses) on available-for-sale debt securities, changes in accumulated net gains (losses) on cash flow hedges, and pension and other postretirement plan-related changes other than net periodic benefit cost.

## Schedule RI-B—Charge-offs and Recoveries on Loans and Leases and Changes in Allowances for Credit Losses

### Part I. Charge-offs and Recoveries on Loans and Leases

Part I includes charge-offs and recoveries through the allocated transfer risk reserve.

| Dollar Amounts in Thousands   | (Column A)<br>Charge-offs <sup>1</sup> |        | (Column B)<br>Recoveries |        |
|---|--|--------|--------------------------|--------|
|   | Calendar Year-to-date                  |        |                          |        |
|   | RIAD                                   | Amount | RIAD                     | Amount |
| 1. Loans secured by real estate:  |  |        |                          |        |
| a. Construction, land development, and other land loans:  |  |        |                          |        |
| (1) 1–4 family residential construction loans .....   | C891                                   |        | C892                     |        |
| (2) Other construction loans and all land development and other land loans .....                                    | C893                                   |        | C894                     |        |
| b. Secured by farmland .....  | 3584                                   |        | 3585                     |        |
| c. Secured by 1–4 family residential properties:  |  |        |                          |        |
| (1) Revolving, open-end loans secured by 1–4 family residential properties and extended under lines of credit ..... | 5411                                   |        | 5412                     |        |
| (2) Closed-end loans secured by 1–4 family residential properties:  |  |        |                          |        |
| (a) Secured by first liens .....  | C234                                   |        | C217                     |        |
| (b) Secured by junior liens .....   | C235                                   |        | C218                     |        |
| d. Secured by multifamily (5 or more) residential properties.....   | 3588                                   |        | 3589                     |        |
| e. Secured by nonfarm nonresidential properties:  |  |        |                          |        |
| (1) Loans secured by owner-occupied nonfarm nonresidential properties ..  | C895                                   |        | C896                     |        |
| (2) Loans secured by other nonfarm nonresidential properties .....  | C897                                   |        | C898                     |        |

1. Include write-downs arising from transfers of loans to a held-for-sale account.

## Schedule RI-B—Continued

### Part I.—Continued

| Dollar Amounts in Thousands   | (Column A)<br>Charge-offs <sup>1</sup> |        | (Column B)<br>Recoveries |        |
|---|--|--------|--------------------------|--------|
|   | Calendar Year-to-date                  |        |                          |        |
|   | RIAD                                   | Amount | RIAD                     | Amount |
| 2. and 3. Not applicable  |  |        |                          |        |
| 4. Commercial and industrial loans.....   | 4638                                   |        | 4608                     |        |
| 5. Loans to individuals for household, family, and other personal expenditures:                   |  |        |                          |        |
| a. Credit cards .....   | B514                                   |        | B515                     |        |
| b. Automobile loans .....   | K129                                   |        | K133                     |        |
| c. Other (includes revolving credit plans other than credit cards and other consumer loans) ..... | K205                                   |        | K206                     |        |
| 6. Not applicable   |  |        |                          |        |
| 7. All other loans <sup>2</sup> .....   | 4644                                   |        | 4628                     |        |
| 8. Lease financing receivables .....  | 4266                                   |        | 4267                     |        |
| 9. Total (sum of items 1 through 8).....  | 4635                                   |        | 4605                     |        |

1. Include write-downs arising from transfers of loans to a held-for-sale account.  
 2. Includes charge-offs and recoveries on "Loans to depository institutions and acceptances of other banks," "Loans to finance agricultural production and other loans to farmers," "Obligations (other than securities and leases) of states and political subdivisions in the U.S.," and "Loans to non-depository financial institutions and other loans."

### Memoranda

| Dollar Amounts in Thousands  | (Column A)<br>Charge-offs <sup>1</sup> |        | (Column B)<br>Recoveries |        |
|--|--|--------|--------------------------|--------|
|  | Calendar Year-to-date                  |        |                          |        |
|  | RIAD                                   | Amount | RIAD                     | Amount |
| 1. Loans to finance commercial real estate, construction, and land development activities ( <i>not secured by real estate</i> ) included in Schedule RI-B, Part I, items 4 and 7, above..... |  |        |                          |        |
| 2. Not applicable  | 5409                                   |        | 5410                     |        |
| 3. Loans to finance agricultural production and other loans to farmers (included in Schedule RI-B, Part I, item 7, above) .....  | 4655                                   |        | 4665                     |        |

1. Include write-downs arising from transfers of loans to a held-for-sale account.  
 2. The \$300 million asset-size test and the 5 percent of total loans test are based on the total assets and total loans reported on the June 30, 2024, Report of Condition.

## Schedule RI-B—Continued

### Part II. Changes in Allowances for Credit Losses

|   | (Column A)<br>Loans and Leases Held<br>for Investment |        | (Column B)<br>Held-to-Maturity<br>Debt Securities |        | (Column C)<br>Available-for-Sale<br>Debt Securities |        |
|---|---|--------|---|--------|---|--------|
|   | RIAD  | Amount | RIAD  | Amount | RIAD  | Amount |
| 1. Balance most recently reported for the December 31, 2024, Reports of Condition and Income (i.e., after adjustments from amended Reports of Income) ..... |   |        |   |        |   |        |
| 2. Recoveries (column A must equal Part I, item 9, column B, above) .....   | B522  |        | JH88  |        | JH94  |        |
| 3. LESS: Charge-offs (column A must equal Part I, item 9, column A, above less Schedule RI-B, Part II, item 4, column A) .....                              | 4605  |        | JH89  |        | JH95  |        |
| 4. LESS: Write-downs arising from transfers of financial assets .....   | C079  |        | JH92  |        | JH98  |        |
| 5. Provisions for credit losses <sup>1</sup> .....  | 5523  |        | JJ00  |        | JJ01  |        |
| 6. Adjustments* (see instructions for this schedule) .....  | 4230  |        | JH90  |        | JH96  |        |
| 7. Balance end of current period (sum of items 1, 2, 5, and 6, less items 3 and 4) (column A must equal Schedule RC, item 4.c) .....                        | C233  |        | JH91  |        | JH97  |        |
|   | 3123  |        | JH93  |        | JH99  |        |

\* Describe on Schedule RI-E—Explanations.

1. The sum of item 5, columns A through C, plus Schedule RI-B, Part II, Memorandum items 5 and 7, below, must equal Schedule RI, item 4.

### Memoranda

|  | Dollar Amounts in Thousands | RIAD | Amount |
|--|-----------------------------|------|--------|
| 1. through 4. Not applicable   |                             |      |        |
| 5. Provisions for credit losses on other financial assets measured at amortized cost (not included in item 5, above) ..... |                             | JJ02 |        |
| 6. Allowance for credit losses on other financial assets measured at amortized cost (not included in item 7, above) .....  |                             | RCON |        |
| 7. Provisions for credit losses on off-balance-sheet credit exposures .....  |                             | JJ03 |        |
|  |                             | RIAD |        |
|  |                             | MG93 |        |

## Schedule RI-C—Disaggregated Data on the Allowances for Credit Losses

Items 1 through 6 are to be completed semiannually in the June and December reports only by institutions with \$1 billion or more in total assets.<sup>1</sup>

|  | Dollar Amounts in Thousands | (Column A)<br>Amortized Cost |        | (Column B)<br>Allowance Balance |        |
|--|-----------------------------|------------------------------|--------|---------------------------------|--------|
|  |                             | RCON                         | Amount | RCON                            | Amount |
| <b>Loans and Leases Held for Investment:</b>             |                             |                              |        |                                 |        |
| 1. Real estate loans:                                    |                             |                              |        |                                 |        |
| a. Construction loans .....                              | JJ04                        |                              | JJ12   |                                 |        |
| b. Commercial real estate loans .....                    | JJ05                        |                              | JJ13   |                                 |        |
| c. Residential real estate loans.....                    | JJ06                        |                              | JJ14   |                                 |        |
| 2. Commercial loans <sup>2</sup> .....                   | JJ07                        |                              | JJ15   |                                 |        |
| 3. Credit cards .....                                    | JJ08                        |                              | JJ16   |                                 |        |
| 4. Other consumer loans .....                            | JJ09                        |                              | JJ17   |                                 |        |
| 5. Unallocated, if any .....                             |                             |                              | JJ18   |                                 |        |
| 6. Total (sum of items 1.a through 5) <sup>3</sup> ..... | JJ11                        |                              | JJ19   |                                 |        |

Items 7 through 11 are to be completed semiannually in the June and December reports only by institutions with \$1 billion or more in total assets.<sup>1</sup>

|   | Dollar Amounts in Thousands | Allowance Balance |        |
|---|-----------------------------|-------------------|--------|
|   |                             | RCON              | Amount |
| <b>Held-to-Maturity Securities:</b>   |                             |                   |        |
| 7. Securities issued by states and political subdivisions in the U.S. .....         |                             | JJ20              |        |
| 8. Mortgage-backed securities (MBS) (including CMOs, REMICs, and stripped MBS)..... |                             | JJ21              |        |
| 9. Asset-backed securities and structured financial products.....                   |                             | JJ23              |        |
| 10. Other debt securities.....  |                             | JJ24              |        |
| 11. Total (sum of items 7 through 10) <sup>4</sup> .....                            |                             | JJ25              |        |

1. The \$1 billion asset-size test is based on the total assets reported on the June 30, 2024, Report of Condition.

2. Include all loans and leases not reported as real estate loans, credit cards, or other consumer loans in items 1, 3, or 4 of Schedule RI-C.

3. Item 6, column B, must equal Schedule RC, item 4.c.

4. Item 11 must equal Schedule RI-B, Part II, item 7, column B.

1.a.  
1.b.  
1.c.  
2.  
3.  
4.  
5.  
6.

7.  
8.  
9.  
10.  
11.

## Schedule RI-E—Explanations

*Schedule RI-E is to be completed each quarter on a calendar year-to-date basis, unless otherwise noted.*

Detail all adjustments in Schedule RI-A and RI-B, all discontinued operations in Schedule RI, and all significant items of other noninterest income and other noninterest expense in Schedule RI. (See instructions for details.)

|  | Dollar Amounts in Thousands | Year-to-date |         |
|--|-----------------------------|--------------|---------|
|  |                             | RIAD         | Amount  |
| <i>Items 1.a through 1.j and 2.a through 2.p are to be completed annually on a calendar year-to-date basis in the December report only.</i>                                  |                             |              |         |
| 1. Other noninterest income (from Schedule RI, item 5.l)   |                             |              |         |
| Itemize and describe amounts greater than \$100,000 that exceed 7 percent of Schedule RI, item 5.l:  |                             |              |         |
| a. Income and fees from the printing and sale of checks .....  | C013                        |              | 1.a.    |
| b. Earnings on/increase in value of cash surrender value of life insurance .....   | C014                        |              | 1.b.    |
| c. Income and fees from automated teller machines (ATMs).....  | C016                        |              | 1.c.    |
| d. Rent and other income from other real estate owned .....  | 4042                        |              | 1.d.    |
| e. Safe deposit box rent.....  | C015                        |              | 1.e.    |
| f. Bank card and credit card interchange fees .....  | F555                        |              | 1.f.    |
| g. Income and fees from wire transfers not reportable as service charges on deposit accounts.....  | T047                        |              | 1.g.    |
| h. <small>TEXT<br/>4461</small>  | 4461                        |              | 1.h.    |
| i. <small>TEXT<br/>4462</small>  | 4462                        |              | 1. i.   |
| j. <small>TEXT<br/>4463</small>  | 4463                        |              | 1. j.   |
| 2. Other noninterest expense (from Schedule RI, item 7.d)  |                             |              |         |
| Itemize and describe amounts greater than \$100,000 that exceed 7 percent of Schedule RI, item 7.d:  |                             |              |         |
| a. Data processing expenses .....  | C017                        |              | 2.a.    |
| b. Advertising and marketing expenses.....   | 0497                        |              | 2.b.    |
| c. Directors' fees .....   | 4136                        |              | 2.c.    |
| d. Printing, stationery, and supplies.....   | C018                        |              | 2.d.    |
| e. Postage .....   | 8403                        |              | 2.e.    |
| f. Legal fees and expenses .....   | 4141                        |              | 2. f.   |
| g. FDIC deposit insurance assessments .....  | 4146                        |              | 2.g.    |
| h. Accounting and auditing expenses .....  | F556                        |              | 2.h.    |
| i. Consulting and advisory expenses .....  | F557                        |              | 2. i.   |
| j. Automated teller machine (ATM) and interchange expenses .....   | F558                        |              | 2. j.   |
| k. Telecommunications expenses .....   | F559                        |              | 2.k.    |
| l. Other real estate owned expenses.....   | Y923                        |              | 2. l.   |
| m. Insurance expenses (not included in employee expenses, premises and fixed asset expenses, and other real estate owned expenses) .....                                     | Y924                        |              | 2.m.    |
| n. <small>TEXT<br/>4464</small>  | 4464                        |              | 2.n.    |
| o. <small>TEXT<br/>4467</small>  | 4467                        |              | 2.o.    |
| p. <small>TEXT<br/>4468</small>  | 4468                        |              | 2.p.    |
| 3. Discontinued operations and applicable income tax effect (from Schedule RI, item 11)  |                             |              |         |
| (itemize and describe each discontinued operation):  |                             |              |         |
| a. (1) <small>TEXT<br/>FT29</small>  | FT29                        |              | 3.a.(1) |
| (2) Applicable income tax effect .....   | FT30                        |              | 3.a.(2) |
| b. (1) <small>TEXT<br/>FT31</small>  | FT31                        |              | 3.b.(1) |
| (2) Applicable income tax effect .....   | FT32                        |              | 3.b.(2) |
| 4. Cumulative effect of changes in accounting principles and corrections of material accounting errors (from Schedule RI-A, item 2) (itemize and describe all such effects): |                             |              |         |
| a. <small>TEXT<br/>B526</small>  | B526                        |              | 4.a.    |
| b. <small>TEXT<br/>B527</small>  | B527                        |              | 4.b.    |

## Schedule RI-E—Continued

|  | Dollar Amounts in Thousands |        | Year-to-date |      |
|--|-----------------------------|--------|--------------|------|
|  | RIAD                        | Amount |              |      |
| 5. Other transactions with stockholders (including a parent holding company)<br>(from Schedule RI-A, item 11) (itemize and describe all such transactions):                            |                             |        |              |      |
| a. TEXT 4498   | 4498                        |        |              | 5.a. |
| b. TEXT 4499   | 4499                        |        |              | 5.b. |
| 6. Adjustments to allowances for credit losses (from Schedule RI-B, Part II, item 6)<br>(itemize and describe all adjustments):  |                             |        |              |      |
| a. Initial allowances for credit losses recognized upon the acquisition of purchased<br>credit-deteriorated assets <sup>1</sup> .....  | JJ27                        |        |              | 6.a. |
| b. TEXT 4521   | 4521                        |        |              | 6.b. |
| c. TEXT 4522   | 4522                        |        |              | 6.c. |
| 7. Other explanations (the space below is provided for the bank to briefly describe, at its option, any<br>other significant items affecting the Report of Income):<br>Comments? ..... | RIAD                        | Yes    | Amount       | No   |
|  | 4769                        |        |              |      |

Other explanations (please type or print clearly; 750 character limit):

(TEXT 4769)

7.

1. Institutions should report initial allowances for credit losses recognized upon the acquisition of purchased credit-deteriorated assets after the adoption of FASB ASC Topic 326.

# Consolidated Report of Condition for Insured Banks and Savings Associations for December 31, 2025

All schedules are to be reported in thousands of dollars. Unless otherwise indicated, report the amount outstanding as of the last business day of the quarter.

## Schedule RC—Balance Sheet

|  | Dollar Amounts in Thousands | RCON | Amount |          |
|--|-----------------------------|------|--------|----------|
| <b>Assets</b>  |                             |      |        |          |
| 1. Cash and balances due from depository institutions:   |                             |      |        |          |
| a. Noninterest-bearing balances and currency and coin <sup>1</sup> .....                           | 0081                        |      |        | 1.a.     |
| b. Interest-bearing balances <sup>2</sup> .....  | 0071                        |      |        | 1.b.     |
| 2. Securities:   |                             |      |        |          |
| a. Held-to-maturity securities (from Schedule RC-B, column A) <sup>3</sup> .....                   | JJ34                        |      |        | 2.a.     |
| b. Available-for-sale debt securities (from Schedule RC-B, column D) .....                         | 1773                        |      |        | 2.b.     |
| c. Equity securities with readily determinable fair values not held for trading <sup>4</sup> ..... | JA22                        |      |        | 2.c.     |
| 3. Federal funds sold and securities purchased under agreements to resell:                         |                             |      |        |          |
| a. Federal funds sold .....  | B987                        |      |        | 3.a.     |
| b. Securities purchased under agreements to resell <sup>5, 6</sup> .....                           | B989                        |      |        | 3.b.     |
| 4. Loans and lease financing receivables (from Schedule RC-C):                                     |                             |      |        |          |
| a. Loans and leases held for sale .....  | 5369                        |      |        | 4.a.     |
| b. Loans and leases held for investment .....  | B528                        |      |        | 4.b.     |
| c. LESS: Allowance for credit losses on loans and leases .....                                     | 3123                        |      |        | 4.c.     |
| d. Loans and leases held for investment, net of allowance (item 4.b minus 4.c) .....               | B529                        |      |        | 4.d.     |
| 5. Trading assets .....  | 3545                        |      |        | 5.       |
| 6. Premises and fixed assets (including right-of-use assets) .....                                 | 2145                        |      |        | 6.       |
| 7. Other real estate owned (from Schedule RC-M).....   | 2150                        |      |        | 7.       |
| 8. Investments in unconsolidated subsidiaries and associated companies .....                       | 2130                        |      |        | 8.       |
| 9. Direct and indirect investments in real estate ventures .....                                   | 3656                        |      |        | 9.       |
| 10. Intangible assets (from Schedule RC-M) .....   | 2143                        |      |        | 10.      |
| 11. Other assets (from Schedule RC-F) <sup>6</sup> .....   | 2160                        |      |        | 11.      |
| 12. Total assets (sum of items 1 through 11).....  | 2170                        |      |        | 12.      |
| <b>Liabilities</b>   |                             |      |        |          |
| 13. Deposits:  |                             |      |        |          |
| a. In domestic offices (sum of totals of columns A and C from Schedule RC-E) .....                 | 2200                        |      |        | 13.a.    |
| (1) Noninterest-bearing <sup>7</sup> .....   | 6631                        |      |        | 13.a.(1) |
| (2) Interest-bearing.....  | 6636                        |      |        | 13.a.(2) |
| b. Not applicable  |                             |      |        |          |
| 14. Federal funds purchased and securities sold under agreements to repurchase:                    |                             |      |        |          |
| a. Federal funds purchased <sup>8</sup> .....  | B993                        |      |        | 14.a.    |
| b. Securities sold under agreements to repurchase <sup>9</sup> .....                               | B995                        |      |        | 14.b.    |
| 15. Trading liabilities .....  | 3548                        |      |        | 15.      |
| 16. Other borrowed money (includes mortgage indebtedness)(from Schedule RC-M).....                 | 3190                        |      |        | 16.      |
| 17. and 18. Not applicable   |                             |      |        |          |
| 19. Subordinated notes and debentures <sup>10</sup> .....  | 3200                        |      |        | 19.      |

1. Includes cash items in process of collection and unposted debits.

2. Includes time certificates of deposit not held for trading.

3. Institutions should report in item 2.a amounts net of any applicable allowance for credit losses, and item 2.a should equal Schedule RC-B, item 8, column A, less Schedule RI-B, Part II, item 7, column B.

4. Item 2.c is to be completed by all institutions. See the instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.

5. Includes all securities resale agreements, regardless of maturity.

6. Institutions should report in items 3.b and 11 amounts net of any applicable allowance for credit losses.

7. Includes noninterest-bearing demand, time, and savings deposits.

8. Report overnight Federal Home Loan Bank advances in Schedule RC, item 16, "Other borrowed money."

9. Includes all securities repurchase agreements, regardless of maturity.

10. Includes limited-life preferred stock and related surplus.

## Schedule RC—Continued

|   | Dollar Amounts in Thousands | RCON | Amount |       |
|---|-----------------------------|------|--------|-------|
| <b>Liabilities—continued</b>  |                             |      |        |       |
| 20. Other liabilities (from Schedule RC-G) .....                          |                             | 2930 |        | 20.   |
| 21. Total liabilities (sum of items 13 through 20) .....                  |                             | 2948 |        | 21.   |
| 22. Not applicable  |                             |      |        |       |
| <b>Equity Capital</b>   |                             |      |        |       |
| <b>Bank Equity Capital</b>  |                             |      |        |       |
| 23. Perpetual preferred stock and related surplus .....                   |                             | 3838 |        | 23.   |
| 24. Common stock .....  |                             | 3230 |        | 24.   |
| 25. Surplus (exclude all surplus related to preferred stock).....         |                             | 3839 |        | 25.   |
| 26. a. Retained earnings.....   |                             | 3632 |        | 26.a. |
| b. Accumulated other comprehensive income <sup>1</sup> .....              |                             | B530 |        | 26.b. |
| c. Other equity capital components <sup>2</sup> .....                     |                             | A130 |        | 26.c. |
| 27. a. Total bank equity capital (sum of items 23 through 26.c) .....     |                             | 3210 |        | 27.a. |
| b. Noncontrolling (minority) interests in consolidated subsidiaries ..... |                             | 3000 |        | 27.b. |
| 28. Total equity capital (sum of items 27.a and 27.b) .....               |                             | G105 |        | 28.   |
| 29. Total liabilities and equity capital (sum of items 21 and 28) .....   |                             | 3300 |        | 29.   |

### Memoranda

#### To be reported with the March Report of Condition.

1. Indicate in the box at the right the number of the statement below that best describes the most comprehensive level of auditing work performed for the bank by independent external auditors as of any date during 2024 .....

| RCON | Number |
|------|--------|
| 6724 |        |

M.1.

1a = An integrated audit of the reporting institution's financial statements and its internal control over financial reporting conducted in accordance with the standards of the American Institute of Certified Public Accountants (AICPA) or the Public Company Accounting Oversight Board (PCAOB) by an independent public accountant that submits a report on the institution  
 1b = An audit of the reporting institution's financial statements only conducted in accordance with the auditing standards of the AICPA or the PCAOB by an independent public accountant that submits a report on the institution  
 2a = An integrated audit of the reporting institution's parent holding company's consolidated financial statements and its internal control over financial reporting conducted in accordance with the standards of the AICPA or the PCAOB by an independent public accountant that submits a report on the consolidated holding company (but not on the institution separately)  
 2b = An audit of the reporting institution's parent holding company's consolidated financial statements only conducted in accordance with the auditing standards of the AICPA or the PCAOB by an independent public accountant that submits a report on the consolidated holding company (but not on the institution separately)

3 = This number is not to be used  
 4 = Directors' examination of the bank conducted in accordance with generally accepted auditing standards by a certified public accounting firm (may be required by state-chartering authority)  
 5 = Directors' examination of the bank performed by other external auditors (may be required by state-chartering authority)  
 6 = Review of the bank's financial statements by external auditors  
 7 = Compilation of the bank's financial statements by external auditors  
 8 = Other audit procedures (excluding tax preparation work)  
 9 = No external audit work

#### To be reported with the March Report of Condition.

2. Bank's fiscal year-end date (report the date in MMDD format) .....

| RCON | Date |
|------|------|
| 8678 |      |

M.2.

1. Includes, but is not limited to, net unrealized holding gains (losses) on available-for-sale securities, accumulated net gains (losses) on cash flow hedges, and accumulated defined benefit pension and other postretirement plan adjustments.  
 2. Includes treasury stock and unearned Employee Stock Ownership Plan shares.

## Schedule RC-B—Securities

Exclude assets held for trading.

| Dollar Amounts in Thousands   | Held-to-maturity             |        |                          |        | Available-for-sale           |        |                          |        |
|---|------------------------------|--------|--------------------------|--------|------------------------------|--------|--------------------------|--------|
|   | (Column A)<br>Amortized Cost |        | (Column B)<br>Fair Value |        | (Column C)<br>Amortized Cost |        | (Column D)<br>Fair Value |        |
|   | RCON                         | Amount | RCON                     | Amount | RCON                         | Amount | RCON                     | Amount |
| 1. U.S. Treasury securities .....   | 0211                         |        | 0213                     |        | 1286                         |        | 1287                     |        |
| 2. U.S. Government agency and sponsored agency obligations (exclude mortgage-backed securities) <sup>1</sup> .....  | HT50                         |        | HT51                     |        | HT52                         |        | HT53                     |        |
| 3. Securities issued by states and political subdivisions in the U.S. .....   | 8496                         |        | 8497                     |        | 8498                         |        | 8499                     |        |
| 4. Mortgage-backed securities (MBS):  |                              |        |                          |        |                              |        |                          |        |
| a. Residential mortgage pass-through securities:  |                              |        |                          |        |                              |        |                          |        |
| (1) Issued or guaranteed by FNMA, FHLMC, or GNMA .....  | HT54                         |        | HT55                     |        | HT56                         |        | HT57                     |        |
| (2) Other pass-through securities..   | G308                         |        | G309                     |        | G310                         |        | G311                     |        |
| b. Other residential mortgage-backed securities (include CMOs, REMICs, and stripped MBS):                           |                              |        |                          |        |                              |        |                          |        |
| (1) Issued or guaranteed by U.S. Government agencies or sponsored agencies <sup>2</sup> .....                       | G312                         |        | G313                     |        | G314                         |        | G315                     |        |
| (2) Collateralized by MBS issued or guaranteed by U.S. Government agencies or sponsored agencies <sup>2</sup> ..... | G316                         |        | G317                     |        | G318                         |        | G319                     |        |
| (3) All other residential MBS..   | G320                         |        | G321                     |        | G322                         |        | G323                     |        |

- Includes Small Business Administration "Guaranteed Loan Pool Certificates"; U.S. Maritime Administration obligations; Export-Import Bank participation certificates; and obligations (other than mortgage-backed securities) issued by the Farm Credit System, the Federal Home Loan Bank System, the Federal Home Loan Mortgage Corporation, the Federal National Mortgage Association, the Resolution Funding Corporation, the Student Loan Marketing Association, and the Tennessee Valley Authority.
- U.S. Government agencies include, but are not limited to, such agencies as the Government National Mortgage Association (GNMA), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Administration (NCUA). U.S. Government-sponsored agencies include, but are not limited to, such agencies as the Federal Home Loan Mortgage Corporation (FHLMC) and the Federal National Mortgage Association (FNMA).

## Schedule RC-B—Continued

| Dollar Amounts in Thousands   | Held-to-maturity             |        |                          |        | Available-for-sale           |        |                          |        |
|---|------------------------------|--------|--------------------------|--------|------------------------------|--------|--------------------------|--------|
|   | (Column A)<br>Amortized Cost |        | (Column B)<br>Fair Value |        | (Column C)<br>Amortized Cost |        | (Column D)<br>Fair Value |        |
|   | RCON                         | Amount | RCON                     | Amount | RCON                         | Amount | RCON                     | Amount |
| 4. c. Commercial MBS  |                              |        |                          |        |                              |        |                          |        |
| (1) Commercial mortgage pass-through securities:  |                              |        |                          |        |                              |        |                          |        |
| (a) Issued or guaranteed by FNMA, FHLMC, or GNMA .....  | K142                         |        | K143                     |        | K144                         |        | K145                     |        |
| (b) Other pass-through securities .....   | K146                         |        | K147                     |        | K148                         |        | K149                     |        |
| (2) Other commercial MBS:   |                              |        |                          |        |                              |        |                          |        |
| (a) Issued or guaranteed by U.S. Government agencies or sponsored agencies <sup>1</sup> ..... | K150                         |        | K151                     |        | K152                         |        | K153                     |        |
| (b) All other commercial MBS .....  | K154                         |        | K155                     |        | K156                         |        | K157                     |        |
| 5. Asset-backed securities and structured financial products:                                 |                              |        |                          |        |                              |        |                          |        |
| a. Asset-backed securities (ABS) .....  | C026                         |        | C988                     |        | C989                         |        | C027                     |        |
| b. Structured financial products.....   | HT58                         |        | HT59                     |        | HT60                         |        | HT61                     |        |
| 6. Other debt securities:   |                              |        |                          |        |                              |        |                          |        |
| a. Other domestic debt securities .....   | 1737                         |        | 1738                     |        | 1739                         |        | 1741                     |        |
| b. Other foreign debt securities .....  | 1742                         |        | 1743                     |        | 1744                         |        | 1746                     |        |
| 7. Unallocated portfolio layer fair value hedge basis adjustments <sup>2</sup> .....          |                              |        |                          |        | MG95                         |        |                          |        |
| 8. Total (sum of items 1 through 7) <sup>3</sup> .....  | 1754                         |        | 1771                     |        | 1772                         |        | 1773                     | 8.     |

1. U.S. Government agencies include, but are not limited to, such agencies as the Government National Mortgage Association (GNMA), the Federal Deposit Insurance Corporation (FDIC), and the National Credit Union Administration (NCUA). U.S. Government-sponsored agencies include, but are not limited to, such agencies as the Federal Home Loan Mortgage Corporation (FHLMC) and the Federal National Mortgage Association (FNMA).

2. This item is to be completed by institutions that have adopted ASU 2022-01, as applicable.

3. The total reported in column A must equal Schedule RC, item 2.a, plus Schedule RI-B, Part II, item 7, column B. The total reported in column D must equal Schedule RC, item 2.b.

## Schedule RC-B—Continued

### Memoranda

|  | Dollar Amounts in Thousands | RCON | Amount |
|--|-----------------------------|------|--------|
| 1. Pledged securities <sup>1</sup> .....   |                             | 0416 |        |
| 2. Maturity and repricing data for debt securities (excluding those in nonaccrual status):   |                             |      |        |
| a. Securities issued by the U.S. Treasury, U.S. Government agencies, and states and political subdivisions in the U.S.; other non-mortgage debt securities; and mortgage pass-through securities other than those backed by closed-end first lien 1–4 family residential mortgages with a remaining maturity or next repricing date of: <sup>2,3</sup> |                             |      |        |
| (1) Three months or less .....   |                             | A549 |        |
| (2) Over three months through 12 months .....  |                             | A550 |        |
| (3) Over one year through three years .....  |                             | A551 |        |
| (4) Over three years through five years .....  |                             | A552 |        |
| (5) Over five years through 15 years .....   |                             | A553 |        |
| (6) Over 15 years .....  |                             | A554 |        |
| b. Mortgage pass-through securities backed by closed-end first lien 1–4 family residential mortgages with a remaining maturity or next repricing date of: <sup>2,4</sup>   |                             |      |        |
| (1) Three months or less .....   |                             | A555 |        |
| (2) Over three months through 12 months .....  |                             | A556 |        |
| (3) Over one year through three years .....  |                             | A557 |        |
| (4) Over three years through five years .....  |                             | A558 |        |
| (5) Over five years through 15 years .....   |                             | A559 |        |
| (6) Over 15 years .....  |                             | A560 |        |
| c. Other mortgage-backed securities (include CMOs, REMICs, and stripped MBS; exclude mortgage pass-through securities) with an expected average life of: <sup>5</sup>  |                             |      |        |
| (1) Three years or less .....  |                             | A561 |        |
| (2) Over three years .....   |                             | A562 |        |
| d. Debt securities with a REMAINING MATURITY of one year or less (included in Memorandum items 2.a through 2.c above) .....  |                             | A248 |        |
| Memorandum item 3 is to be completed semiannually in the June and December reports only.   |                             |      |        |
| 3. Amortized cost of held-to-maturity securities sold or transferred to available-for-sale or trading securities during the calendar year-to-date (report the amortized cost at date of sale or transfer) ..   |                             | 1778 |        |
| 4. Structured notes (included in the held-to-maturity and available-for-sale accounts in Schedule RC-B, items 2, 3, 5, and 6):   |                             |      |        |
| a. Amortized cost .....  |                             | 8782 |        |
| b. Fair value .....  |                             | 8783 |        |
| 5. and 6. Not applicable   |                             |      |        |

1. Includes held-to-maturity securities at amortized cost, available-for-sale debt securities at fair value, and equity securities with readily determinable fair values not held for trading (reported in Schedule RC, item 2.c) at fair value.
2. Report fixed-rate debt securities by remaining maturity and floating-rate debt securities by next repricing date.
3. Sum of Memorandum items 2.a.(1) through 2.a.(6) plus any nonaccrual debt securities in the categories of debt securities reported in Memorandum item 2.a that are included in Schedule RC-N, item 10, column C, must equal Schedule RC-B, sum of items 1, 2, 3, 4.c.(1), 5, and 6, columns A and D, plus residential mortgage pass-through securities other than those backed by closed-end first lien 1–4 family residential mortgages included in Schedule RC-B, item 4.a, columns A and D.
4. Sum of Memorandum items 2.b.(1) through 2.b.(6) plus any nonaccrual mortgage pass-through securities backed by closed-end first lien 1–4 family residential mortgages included in Schedule RC-N, item 10, column C, must equal Schedule RC-B, item 4.a, sum of columns A and D, less the amount of residential mortgage pass-through securities other than those backed by closed-end first lien 1–4 family residential mortgages included in Schedule RC-B, item 4.a, columns A and D.
5. Sum of Memorandum items 2.c.(1) and 2.c.(2) plus any nonaccrual "Other mortgage-backed securities" included in Schedule RC-N, item 10, column C, must equal Schedule RC-B, sum of items 4.b and 4.c.(2), columns A and D.

## Schedule RC-B—Continued

### Memoranda—Continued

| Dollar Amounts in Thousands   | Held-to-maturity             |        |                          |        | Available-for-sale           |        |                          |        |
|---|------------------------------|--------|--------------------------|--------|------------------------------|--------|--------------------------|--------|
|   | (Column A)<br>Amortized Cost |        | (Column B)<br>Fair Value |        | (Column C)<br>Amortized Cost |        | (Column D)<br>Fair Value |        |
|   | RCON                         | Amount | RCON                     | Amount | RCON                         | Amount | RCON                     | Amount |
| 7. Guaranteed by U.S.<br>Government agencies<br>or sponsored agencies<br>included in Schedule<br>RC-B, item 5.b ..... |                              |        |                          |        |                              |        |                          |        |
|   | PU98                         |        | PU99                     |        | PV00                         |        | PV01                     |        |

M.7.

## Schedule RC-C—Loans and Lease Financing Receivables

### Part I. Loans and Leases

Do not deduct the allowance for credit losses on loans and leases or the allocated transfer risk reserve from amounts reported in this schedule. Report (1) loans and leases held for sale at the lower of cost or fair value, (2) loans and leases held for investment, net of unearned income, and (3) loans and leases accounted for at fair value under a fair value option. Exclude assets held for trading and commercial paper.

|  | Dollar Amounts in Thousands | RCON | Amount     |
|--|-----------------------------|------|------------|
| 1. Loans secured by real estate:   |                             |      |            |
| a. Construction, land development, and other land loans:   |                             |      |            |
| (1) 1–4 family residential construction loans .....  | F158                        |      | 1.a.(1)    |
| (2) Other construction loans and all land development and other land loans   | F159                        |      | 1.a.(2)    |
| b. Secured by farmland<br>(including farm residential and other improvements) .....  | 1420                        |      | 1.b.       |
| c. Secured by 1–4 family residential properties:   |                             |      |            |
| (1) Revolving, open-end loans secured by 1–4 family residential properties and extended<br>under lines of credit .....   | 1797                        |      | 1.c.(1)    |
| (2) Closed-end loans secured by 1–4 family residential properties:   |                             |      |            |
| (a) Secured by first liens .....   | 5367                        |      | 1.c.(2)(a) |
| (b) Secured by junior liens .....  | 5368                        |      | 1.c.(2)(b) |
| d. Secured by multifamily (5 or more) residential properties .....   | 1460                        |      | 1.d.       |
| e. Secured by nonfarm nonresidential properties:   |                             |      |            |
| (1) Loans secured by owner-occupied nonfarm nonresidential properties .....  | F160                        |      | 1.e.(1)    |
| (2) Loans secured by other nonfarm nonresidential properties .....   | F161                        |      | 1.e.(2)    |
| 2. Loans to depository institutions and acceptances of other banks .....   | 1288                        |      | 2.         |
| 3. Loans to finance agricultural production and other loans to farmers .....   | 1590                        |      | 3.         |
| 4. Commercial and industrial loans .....   | 1766                        |      | 4.         |
| 5. Not applicable  |                             |      |            |
| 6. Loans to individuals for household, family, and other personal expenditures<br>(i.e., consumer loans) (includes purchased paper):                                 |                             |      |            |
| a. Credit cards .....  | B538                        |      | 6.a.       |
| b. Other revolving credit plans .....  | B539                        |      | 6.b.       |
| c. Automobile loans .....  | K137                        |      | 6.c.       |
| d. Other consumer loans (includes single payment and installment, loans other than automobile<br>loans, and all student loans) .....                                 | K207                        |      | 6.d.       |
| 7. Not applicable  |                             |      |            |
| 8. Obligations (other than securities and leases) of states and political subdivisions in the U.S. ....  | 2107                        |      | 8.         |
| 9. Loans to nondepository financial institutions and other loans:  |                             |      |            |
| a. Loans to nondepository financial institutions .....   | J454                        |      | 9.a.       |
| b. Other loans .....   | J464                        |      | 9.b.       |
| 10. Lease financing receivables (net of unearned income) .....   | 2165                        |      | 10.        |
| 11. LESS: Any unearned income on loans reflected in items 1-9 above .....  | 2123                        |      | 11.        |
| 12. Total loans and leases held for investment and held for sale<br>(sum of items 1 through 10 minus item 11) (must equal Schedule RC, sum of items 4.a and 4.b) ... | 2122                        |      | 12.        |

## Schedule RC-C—Continued

### Part I—Continued

#### Memoranda

|   | Dollar Amounts in Thousands | RCON | Amount        |
|---|-----------------------------|------|---------------|
| <i>Memorandum items 1.a.(1) through 1.f.(5) are to be completed semiannually in the June and December reports only. Memorandum item 1.g is to be completed quarterly.</i>   |                             |      |               |
| 1. Loan modifications to borrowers experiencing financial difficulty that are in compliance with their modified terms (included in Schedule RC-C, Part I, and not reported as past due or nonaccrual in Schedule RC-N, Memorandum item 1):                          |                             |      |               |
| a. Construction, land development, and other land loans:  |                             |      |               |
| (1) 1–4 family residential construction loans .....   | K158                        |      | M.1.a.(1)     |
| (2) Other construction loans and all land development and other land loans .....  | K159                        |      | M.1.a.(2)     |
| b. Loans secured by 1–4 family residential properties .....   | F576                        |      | M.1.b.        |
| c. Secured by multifamily (5 or more) residential properties .....  | K160                        |      | M.1.c.        |
| d. Secured by nonfarm nonresidential properties:  |                             |      |               |
| (1) Loans secured by owner-occupied nonfarm nonresidential properties .....   | K161                        |      | M.1.d.(1)     |
| (2) Loans secured by other nonfarm nonresidential properties .....  | K162                        |      | M.1.d.(2)     |
| e. Commercial and industrial loans .....  | K256                        |      | M.1.e.        |
| f. All other loans ( <i>include</i> loans to individuals for household, family, and other personal expenditures) .....  | K165                        |      | M.1. f.       |
| <i>Itemize loan categories included in Memorandum item 1.f, above that exceed 10 percent of total loan modifications to borrowers experiencing financial difficulty that are in compliance with their modified terms (sum of Memorandum items 1.a through 1.f):</i> |                             |      |               |
| (1) Loans secured by farmland .....   | K166                        |      | M.1. f.(1)    |
| (2) and (3) Not applicable  |                             |      |               |
| (4) Loans to individuals for household, family, and other personal expenditures:  |                             |      |               |
| (a) Credit cards .....  | K098                        |      | M.1. f.(4)(a) |
| (b) Automobile loans .....  | K203                        |      | M.1. f.(4)(b) |
| (c) Other (includes revolving credit plans other than credit cards and other consumer loans) .....  | K204                        |      | M.1. f.(4)(c) |
| <i>Memorandum item 1.f.(5) is to be completed by:<sup>1</sup></i>   |                             |      |               |
| • Banks with \$300 million or more in total assets  |                             |      |               |
| • Banks with less than \$300 million in total assets that have loans to finance agricultural production and other loans to farmers (Schedule RC-C, Part I, item 3) exceeding 5 percent of total loans   |                             |      |               |
| (5) Loans to finance agricultural production and other loans to farmers ..  | K168                        |      | M.1. f.(5)    |
| g. Total loan modifications to borrowers experiencing financial difficulty that are in compliance with their modified terms (sum of Memorandum items 1.a.(1) through 1.f) .....   | HK25                        |      | M.1.g.        |

1. The \$300 million asset-size test and the 5 percent of total loans test are based on the total assets and total loans reported on the June 30, 2024, Report of Condition.

## Schedule RC-C—Continued

### Part I—Continued

#### Memoranda—Continued

|   | Dollar Amounts in Thousands | RCON | Amount    |
|---|-----------------------------|------|-----------|
| 2. Maturity and repricing data for loans and leases (excluding those in nonaccrual status):   |                             |      |           |
| a. Closed-end loans secured by first liens on 1–4 family residential properties (reported in Schedule RC-C, Part I, item 1.c.(2)(a)) with a remaining maturity or next repricing date of: <sup>1,2</sup>  |                             |      |           |
| (1) Three months or less .....  | A564                        |      | M.2.a.(1) |
| (2) Over three months through 12 months .....   | A565                        |      | M.2.a.(2) |
| (3) Over one year through three years .....   | A566                        |      | M.2.a.(3) |
| (4) Over three years through five years .....   | A567                        |      | M.2.a.(4) |
| (5) Over five years through 15 years .....  | A568                        |      | M.2.a.(5) |
| (6) Over 15 years .....   | A569                        |      | M.2.a.(6) |
| b. All loans and leases (reported in Schedule RC-C, Part I, items 1 through 10, above) EXCLUDING closed-end loans secured by first liens on 1–4 family residential properties (reported in Schedule RC-C, Part I, item 1.c.(2)(a), above) with a remaining maturity or next repricing date of: <sup>1,3</sup> |                             |      |           |
| (1) Three months or less .....  | A570                        |      | M.2.b.(1) |
| (2) Over three months through 12 months .....   | A571                        |      | M.2.b.(2) |
| (3) Over one year through three years .....   | A572                        |      | M.2.b.(3) |
| (4) Over three years through five years .....   | A573                        |      | M.2.b.(4) |
| (5) Over five years through 15 years .....  | A574                        |      | M.2.b.(5) |
| (6) Over 15 years .....   | A575                        |      | M.2.b.(6) |
| c. Loans and leases (reported in Schedule RC-C, Part I, items 1 through 10, above) with a REMAINING MATURITY of one year or less (excluding those in nonaccrual status) ...   | A247                        |      | M.2.c.    |
| 3. Loans to finance commercial real estate, construction, and land development activities ( <i>not secured by real estate</i> ) included in Schedule RC-C, Part I, items 4 and 9 <sup>4</sup> .....   | 2746                        |      | M.3.      |
| 4. Adjustable-rate closed-end loans secured by first liens on 1–4 family residential properties (included in Schedule RC-C, Part I, item 1.c.(2)(a)) .....  | 5370                        |      | M.4.      |
| 5. and 6. Not applicable  |                             |      |           |

1. Report fixed-rate loans and leases by remaining maturity and floating rate loans by next repricing date.
2. Sum of Memorandum items 2.a.(1) through 2.a.(6) plus total nonaccrual closed-end loans secured by first liens on 1–4 family residential properties included in Schedule RC-N, item 1.c.(2)(a), column C, must equal total closed-end loans secured by first liens on 1–4 family residential properties from Schedule RC-C, Part I, item 1.c.(2)(a).
3. Sum of Memorandum items 2.b.(1) through 2.b.(6), plus total nonaccrual loans and leases from Schedule RC-N, item 9, column C, minus nonaccrual closed-end loans secured by first liens on 1–4 family residential properties included in Schedule RC-N, item 1.c.(2)(a), column C, must equal total loans and leases from Schedule RC-C, Part I, sum of items 1 through 10, minus total closed-end loans secured by first liens on 1–4 family residential properties from Schedule RC-C, Part I, item 1.c.(2)(a).
4. Exclude loans secured by real estate that are included in Schedule RC-C, Part I, items 1.a through 1.e.

## Schedule RC-C—Continued

### Part I—Continued

#### Memoranda—Continued

|   | Dollar Amounts in Thousands | RCON | Amount |
|---|-----------------------------|------|--------|
| 7. Not applicable   |                             |      |        |
| <i>Memorandum item 8.a is to be completed by all banks semiannually in the June and December reports only.</i>  |                             |      |        |
| 8. Closed-end loans with negative amortization features secured by 1–4 family residential properties:   |                             |      |        |
| a. Total amount of closed-end loans with negative amortization features secured by 1–4 family residential properties (included in Schedule RC-C, Part I, items 1.c.(2)(a) and (b)) .....  | F230                        |      | M.8.a. |
| <i>Memorandum items 8.b and 8.c are to be completed annually in the December report only by banks that had closed-end loans with negative amortization features secured by 1–4 family residential properties (as reported in Schedule RC-C, Part I, Memorandum item 8.a) as of the preceding December 31 report date, that exceeded the lesser of \$100 million or 5 percent of total loans and leases held for investment and held for sale (as reported in Schedule RC-C, Part I, item 12).</i> |                             |      |        |
| b. Total maximum remaining amount of negative amortization contractually permitted on closed-end loans secured by 1–4 family residential properties .....   | F231                        |      | M.8.b. |
| c. Total amount of negative amortization on closed-end loans secured by 1–4 family residential properties included in the amount reported in Memorandum item 8.a above.....   | F232                        |      | M.8.c. |
| 9. Loans secured by 1–4 family residential properties in process of foreclosure (included in Schedule RC-C, Part I, items 1.c.(1), 1.c.(2)(a), and 1.c.(2)(b)) .....  | F577                        |      | M.9.   |
| 10. and 11. Not applicable  |                             |      |        |

| Dollar Amounts in Thousands   | (Column A)<br>Fair Value of Acquired<br>Loans and Leases at<br>Acquisition Date |        | (Column B)<br>Gross Contractual<br>Amounts Receivable<br>at Acquisition Date |        | (Column C)<br>Best Estimate at<br>Acquisition Date of<br>Contractual Cash Flows<br>Not Expected to be<br>Collected |        |
|---|---|--------|--|--------|--|--------|
|   | RCON  | Amount | RCON   | Amount | RCON   | Amount |
| <i>Memorandum item 12 is to be completed semiannually in the June and December reports only.</i>  |   |        |  |        |  |        |
| 12. Loans (not considered purchased credit - deteriorated) and leases held for investment that were acquired in business combinations with acquisition dates in the current calendar year ..... | GW45  |        | GW46   |        | GW47   |        |

M.12.

## Schedule RC-C—Continued

### Part I—Continued

#### Memoranda—Continued

|   | Dollar Amounts in Thousands | RCON | Amount |         |
|---|-----------------------------|------|--------|---------|
| <i>Memorandum item 13 is to be completed by banks that had construction, land development, and other land loans (as reported in Schedule RC-C, Part I, item 1.a) that exceeded the sum of tier 1 capital (as reported in Schedule RC-R, Part I, item 26) plus the allowance for credit losses on loans and leases (as reported in Schedule RC, item 4.c) as of the preceding December 31 report date.</i> |                             |      |        |         |
| 13. Construction, land development, and other land loans with interest reserves:  |                             |      |        |         |
| a. Amount of loans that provide for the use of interest reserves<br>(included in Schedule RC-C, Part I, item 1.a) .....   |                             | G376 |        | M.13.a. |
| b. Amount of interest capitalized from interest reserves on construction, land development, and other land loans that is included in interest and fee income on loans during the quarter<br>(included in Schedule RI, item 1.a.(1)(b)).....   |                             | RIAD |        |         |
|   |                             | G377 |        | M.13.b. |
|   |                             | RCON |        |         |
|   |                             | G378 |        | M.14.   |
| <i>Memorandum item 14 is to be completed by all banks.</i>  |                             |      |        |         |
| 14. Pledged loans and leases .....  |                             |      |        |         |
| <i>Memorandum item 15 is to be completed for the December report only.</i>  |                             |      |        |         |
| 15. Reverse mortgages:  |                             |      |        |         |
| a. Reverse mortgages outstanding that are held for investment<br>(included in Schedule RC-C, item 1.c, above) .....   |                             | PR04 |        | M.15.a. |
| b. Estimated number of reverse mortgage loan referrals to other lenders during the year from whom compensation has been received for services performed in connection with the origination of the reverse mortgages.....  |                             | PR05 | Number | M.15.b. |
|   |                             | PR06 | Amount | M.15.c. |
| c. Principal amount of reverse mortgage originations that have been sold during the year .....  |                             |      |        |         |
| <i>Memorandum item 16 is to be completed by all banks in the June and December reports only.</i>  |                             |      |        |         |
| 16. Revolving, open-end loans secured by 1–4 family residential properties and extended under lines of credit that have converted to non-revolving closed-end status<br>(included in item 1.c.(1) above) .....  |                             | LE75 |        | M.16.   |
| <i>Amounts reported in Memorandum items 17.a and 17.b will not be made available to the public on an individual institution basis.</i>  |                             |      |        |         |
| 17. Eligible loan modifications under Section 4013, <i>Temporary Relief from Troubled Debt Restructurings</i> , of the 2020 Coronavirus Aid, Relief, and Economic Security Act:   |                             |      |        |         |
| a. Number of Section 4013 loans outstanding .....   |                             | LG24 | Number | M.17.a. |
| b. Outstanding balance of Section 4013 loans .....  |                             | LG25 | Amount | M.17.b. |

## Schedule RC-C—Continued

### Part II. Loans to Small Businesses and Small Farms

*Schedule RC-C, Part II, Loans to Small Businesses and Small Farms, is to be completed semiannually in the June and December reports only.*

Report the number and amount currently outstanding as of *the report date* of business loans with "original amounts" of \$1,000,000 or less and farm loans with "original amounts" of \$500,000 or less. The following guidelines should be used to determine the "original amount" of a loan:

- (1) For loans drawn down under lines of credit or loan commitments, the "original amount" of the loan is the size of the line of credit or loan commitment when the line of credit or loan commitment was *most recently* approved, extended, or renewed prior to the report date. However, if the amount currently outstanding as of the report date exceeds this size, the "original amount" is the amount currently outstanding on the report date.
- (2) For loan participations and syndications, the "original amount" of the loan participation or syndication is the entire amount of the credit originated by the lead lender.
- (3) For all other loans, the "original amount" is the total amount of the loan at origination or the amount currently outstanding as of the report date, whichever is larger.

#### Loans to Small Businesses

1. Indicate in the appropriate box at the right whether all or substantially all of the dollar volume of your bank's "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, Part I, items 1.e.(1) and 1.e.(2), and all or substantially all of the dollar volume of your bank's "Commercial and industrial loans" reported in Schedule RC-C, Part I, item 4, have *original amounts* of \$100,000 or less (If your bank has no loans outstanding in *both* of these two loan categories, place an "X" in the box marked "NO.").....

| RCON | Yes |  | No |
|------|-----|--|----|
| 6999 |     |  |    |

1.

If YES, complete items 2.a and 2.b below, skip items 3 and 4, and go to item 5.

If NO and your bank has loans outstanding in either loan category, skip items 2.a and 2.b, complete items 3 and 4 below, and go to item 5.

If NO and your bank has no loans outstanding in both loan categories, skip items 2 through 4, and go to item 5.

2. Report the total *number* of loans *currently outstanding* for each of the following Schedule RC-C, Part I, loan categories:
  - a. "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, Part I, items 1.e.(1) and 1.e.(2) (Note: Sum of items 1.e.(1) and 1.e.(2) divided by the number of loans should NOT exceed \$100,000.).....
  - b. "Commercial and industrial loans" reported in Schedule RC-C, Part I, item 4 (Note: Item 4 divided by the number of loans should NOT exceed \$100,000.).....

| Number of Loans |        |
|-----------------|--------|
| RCON            | Number |
|                 |        |
| 5562            |        |
|                 |        |
| 5563            |        |

2.a.  
2.b.

3. Number and amount *currently outstanding* of "Loans secured by nonfarm nonresidential properties" reported in Schedule RC-C, Part I, items 1.e.(1) and 1.e.(2) (sum of items 3.a through 3.c must be less than or equal to Schedule RC-C, Part I, sum of items 1.e.(1) and 1.e.(2)):
  - a. With *original amounts* of \$100,000 or less .....
  - b. With *original amounts* of more than \$100,000 through \$250,000 .....
  - c. With *original amounts* of more than \$250,000 through \$1,000,000 .....
4. Number and amount *currently outstanding* of "Commercial and industrial loans" reported in Schedule RC-C, Part I, item 4 (sum of items 4.a through 4.c must be less than or equal to Schedule RC-C, Part I, item 4):
  - a. With *original amounts* of \$100,000 or less .....
  - b. With *original amounts* of more than \$100,000 through \$250,000 .....
  - c. With *original amounts* of more than \$250,000 through \$1,000,000 .....

| (Column A)<br>Number of Loans |        | (Column B)<br>Amount<br>Currently<br>Outstanding |        |
|-------------------------------|--------|--|--------|
| RCON                          | Number | RCON   | Amount |
|                               |        |  |        |
| 5564                          |        | 5565   |        |
| 5566                          |        | 5567   |        |
| 5568                          |        | 5569   |        |
|                               |        |  |        |
|                               |        |  |        |
|                               |        |  |        |
| 5570                          |        | 5571   |        |
| 5572                          |        | 5573   |        |
| 5574                          |        | 5575   |        |

3.a.  
3.b.  
3.c.

4.a.  
4.b.  
4.c.

## Schedule RC-C—Continued

### Part II—Continued

#### Agricultural Loans to Small Farms

5. Indicate in the appropriate box at the right whether all or substantially all of the dollar volume of your bank's "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, Part I, item 1.b, *and* all or substantially all of the dollar volume of your bank's "Loans to finance agricultural production and other loans to farmers" in reported in Schedule RC-C, Part I, item 3, have *original amounts* of \$100,000 or less (If your bank has no loans outstanding in *both* of these two loan categories, place an "X" in the box marked "NO.").....

| RCON | Yes | No |
|------|-----|----|
| 6860 |     |    |

5.

If YES, complete items 6.a and 6.b below, and do not complete items 7 and 8.

If NO and your bank has loans outstanding in either loan category, skip items 6.a and 6.b and complete items 7 and 8 below.

If NO and your bank has no loans outstanding in both loan categories, do not complete items 6 through 8.

6. Report the total *number* of loans *currently outstanding* for each of the following Schedule RC-C, Part I, loan categories:

| Number of Loans |        |
|-----------------|--------|
| RCON            | Number |
|                 |        |
| 5576            |        |
|                 |        |
| 5577            |        |

6.a.

6.b.

a. "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, Part I, item 1.b (Note: Item 1.b, divided by the number of loans should NOT exceed \$100,000.) .....

b. "Loans to finance agricultural production and other loans to farmers" in reported in Schedule RC-C, Part I, item 3 (Note: Item 3 divided by the number of loans should NOT exceed \$100,000.) .....

| (Column A)<br>Number of Loans |        | (Column B)<br>Amount<br>Currently<br>Outstanding |        |
|-------------------------------|--------|--|--------|
| RCON                          | Number | RCON   | Amount |
|                               |        |  |        |
| 5578                          |        | 5579   |        |
| 5580                          |        | 5581   |        |
| 5582                          |        | 5583   |        |

7. Number and amount *currently outstanding* of "Loans secured by farmland (including farm residential and other improvements)" reported in Schedule RC-C, Part I, item 1.b (sum of items 7.a through 7.c must be less than or equal to Schedule RC-C, Part I, item 1.b):

7.a.  
7.b.  
7.c.

a. With *original amounts* of \$100,000 or less .....

b. With *original amounts* of more than \$100,000 through \$250,000 .....

c. With *original amounts* of more than \$250,000 through \$500,000 .....

| RCON | Number | RCON | Amount |
|------|--------|------|--------|
|      |        |      |        |
| 5584 |        | 5585 |        |
| 5586 |        | 5587 |        |
| 5588 |        | 5589 |        |

8.a.  
8.b.  
8.c.

8. Number and amount *currently outstanding* of "Loans to finance agricultural production and other loans to farmers" reported in Schedule RC-C, Part I, item 3 (sum of items 8.a through 8.c must be less than or equal to Schedule RC-C, Part I, item 3):

a. With *original amounts* of \$100,000 or less .....

b. With *original amounts* of more than \$100,000 through \$250,000 .....

c. With *original amounts* of more than \$250,000 through \$500,000 .....

## Schedule RC-E—Deposit Liabilities

| Dollar Amounts in Thousands  | Transaction Accounts  |        |  |        | Nontransaction Accounts  |        |
|--|---|--------|--|--------|--|--------|
|  | (Column A)<br>Total Transaction<br>Accounts (Including<br>Total Demand<br>Deposits) |        | (Column B)<br>Memo: Total<br>Demand Deposits <sup>1</sup><br>(Included in<br>Column A) |        | (Column C)<br>Total<br>Nontransaction<br>Accounts<br>(Including MMDAs) |        |
|  | RCON  | Amount | RCON   | Amount | RCON   | Amount |
| Deposits of:   |   |        |  |        |  |        |
| 1. Individuals, partnerships, and corporations .....   | B549  |        |  |        | B550   |        |
| 2. U.S. Government .....   | 2202  |        |  |        | 2520   |        |
| 3. States and political subdivisions in the U.S. ....  | 2203  |        |  |        | 2530   |        |
| 4. Commercial banks and other depository<br>institutions in the U.S. ....                                  | B551  |        |  |        | B552   |        |
| 5. Banks in foreign countries .....  | 2213  |        |  |        | 2236   |        |
| 6. Foreign governments and official institutions<br>(including foreign central banks).....                 | 2216  |        |  |        | 2377   |        |
| 7. Total (sum of items 1 through 6) (sum of<br>columns A and C must equal Schedule RC,<br>item 13.a) ..... | 2215  |        | 2210   |        | 2385   |        |

### Memoranda

| Dollar Amounts in Thousands  | RCON | Amount |           |
|--|------|--------|-----------|
| 1. Selected components of total deposits (i.e., sum of item 7, columns A and C):   |      |        |           |
| <i>Memorandum item 1.a is to be completed semiannually in the June and December reports only.</i>  |      |        |           |
| a. Total Individual Retirement Accounts (IRAs) and Keogh Plan accounts .....   | 6835 |        | M.1.a.    |
| b. Total brokered deposits .....   | 2365 |        | M.1.b.    |
| c. Brokered deposits of \$250,000 or less (fully insured brokered deposits) <sup>2</sup> .....   | HK05 |        | M.1.c.    |
| d. Maturity data for brokered deposits:  |      |        |           |
| (1) Brokered deposits of \$250,000 or less with a remaining maturity of one year or less<br>(included in Memorandum item 1.c above) .....  | HK06 |        | M.1.d.(1) |
| (2) Not applicable   |      |        |           |
| (3) Brokered deposits of more than \$250,000 with a remaining maturity of one year or<br>less (included in Memorandum item 1.b above) .....  | K220 |        | M.1.d.(3) |
| e. Preferred deposits (uninsured deposits of states and political subdivisions in the U.S.<br>reported in item 3 above which are secured or collateralized as required under state law)<br><i>(to be completed for the December report only)</i> ..... | 5590 |        | M.1.e.    |
| f. Estimated amount of deposits obtained through the use of deposit listing services<br>that are not brokered deposits .....   | K223 |        | M.1. f.   |
| g. Total reciprocal deposits.....  | JH83 |        | M.1.g.    |
| <i>Memorandum items 1.h.(1) through 1.h.(4) and 1.i. are to be completed semiannually in the<br/>June and December reports only.</i>   |      |        |           |
| h. Sweep deposits:   |      |        |           |
| (1) Fully insured, affiliate sweep deposits .....  | MT87 |        | M.1.h.(1) |
| (2) Not fully insured, affiliate sweep deposits .....  | MT89 |        | M.1.h.(2) |
| (3) Fully insured, non-affiliate sweep deposits .....  | MT91 |        | M.1.h.(3) |
| (4) Not fully insured, non-affiliate sweep deposits .....  | MT93 |        | M.1.h.(4) |
| i. Total sweep deposits that are not brokered deposits .....   | MT95 |        | M.1.i.    |

1. Includes interest-bearing and noninterest-bearing demand deposits.

2. The dollar amount used as the basis for reporting in Memorandum item 1.c reflects the deposit insurance limit in effect on the report date.

## Schedule RC-E—Continued

### Memoranda—Continued

|  | Dollar Amounts in Thousands |           |
|--|-----------------------------|-----------|
|  | RCON                        | Amount    |
| 2. Components of total nontransaction accounts<br>(sum of Memorandum items 2.a through 2.d must equal item 7, column C above):                                       |                             |           |
| a. Savings deposits:   |                             |           |
| (1) Money market deposit accounts (MMDAs) .....  | 6810                        | M.2.a.(1) |
| (2) Other savings deposits (excludes MMDAs) .....  | 0352                        | M.2.a.(2) |
| b. Total time deposits of less than \$100,000 .....  | 6648                        | M.2.b.    |
| c. Total time deposits of \$100,000 through \$250,000 .....  | J473                        | M.2.c.    |
| d. Total time deposits of more than \$250,000 .....  | J474                        | M.2.d.    |
| e. Individual Retirement Accounts (IRAs) and Keogh Plan accounts of \$100,000 or more<br>included in Memorandum items 2.c and 2.d above .....                        | F233                        | M.2.e.    |
| 3. Maturity and repricing data for time deposits of \$250,000 or less:   |                             |           |
| a. Time deposits of \$250,000 or less with a remaining maturity or next repricing date of: <sup>1, 2</sup>   |                             |           |
| (1) Three months or less .....   | HK07                        | M.3.a.(1) |
| (2) Over three months through 12 months .....  | HK08                        | M.3.a.(2) |
| (3) Over one year through three years .....  | HK09                        | M.3.a.(3) |
| (4) Over three years .....   | HK10                        | M.3.a.(4) |
| b. Time deposits of \$250,000 or less with a REMAINING MATURITY of one year or less<br>(included in Memorandum items 3.a.(1) and 3.a.(2) above) <sup>3</sup> .....   | HK11                        | M.3.b.    |
| 4. Maturity and repricing data for time deposits of more than \$250,000:   |                             |           |
| a. Time deposits of more than \$250,000 with a remaining maturity or next repricing date of: <sup>1, 4</sup>   |                             |           |
| (1) Three months or less .....   | HK12                        | M.4.a.(1) |
| (2) Over three months through 12 months .....  | HK13                        | M.4.a.(2) |
| (3) Over one year through three years .....  | HK14                        | M.4.a.(3) |
| (4) Over three years .....   | HK15                        | M.4.a.(4) |
| b. Time deposits of more than \$250,000 with a REMAINING MATURITY of one year or less<br>(included in Memorandum items 4.a.(1) and 4.a.(2) above) <sup>3</sup> ..... | K222                        | M.4.b.    |

*Memorandum item 5 is to be completed semiannually in the June and December reports only.*

5. Does your institution offer one or more consumer deposit account products, i.e., transaction account or nontransaction savings account deposit products intended primarily for individuals for personal, household, or family use?.....

| RCON | Yes | No |
|------|-----|----|
| P752 |     |    |

M.5.

|   | Dollar Amounts in Thousands |        |
|---|-----------------------------|--------|
|   | RCON                        | Amount |
| <i>Memorandum items 6 and 7 are to be completed annually in the December report only by institutions with \$1 billion or more in total assets<sup>5</sup> that answered "Yes" to Memorandum 5 above.</i>      |                             |        |
| 6. Components of total transaction account deposits of individuals, partnerships, and corporations<br>(sum of Memorandum items 6.a and 6.b must be less than or equal to<br>Schedule RC-E, item 1, column A): |                             |        |
| a. Total deposits in those noninterest-bearing transaction account deposit products intended<br>primarily for individuals for personal, household, or family use .....  | P753                        | M.6.a. |
| b. Total deposits in those interest-bearing transaction account deposit products intended<br>primarily for individuals for personal, household, or family use .....   | P754                        | M.6.b. |

1. Report fixed-rate time deposits by remaining maturity and floating rate time deposits by next repricing date.
2. Sum of Memorandum items 3.a.(1) through 3.a.(4) must equal Schedule RC-E, sum of Memorandum items 2.b and 2.c.
3. Report both fixed-and floating-rate time deposits by remaining maturity. Exclude floating-rate time deposits with a next repricing date of one year or less that have a remaining maturity of over one year.
4. Sum of Memorandum items 4.a.(1) through 4.a.(4) must equal Schedule RC-E, Memorandum item 2.d.
5. The \$1 billion asset-size test is based on the total assets reported on the June 30, 2024, Report of Condition.

## Schedule RC-E—Continued

### Memoranda—Continued

|   | Dollar Amounts in Thousands |           |
|---|-----------------------------|-----------|
|   | RCON                        | Amount    |
| 7. Components of total nontransaction account deposits of individuals, partnerships, and corporations (sum of Memorandum items 7.a.(1), 7.a.(2), 7.b.(1), and 7.b.(2) plus all time deposits of individuals, partnerships, and corporations must equal Schedule RC-E, item 1, column C) |                             |           |
| a. Money market deposit accounts (MMDAs) of individuals, partnerships, and corporations (sum of Memorandum items 7.a.(1) and 7.a.(2) must be less than or equal to Schedule RC-E, Memorandum item 2.a.(1) above):   |                             |           |
| (1) Total deposits in those MMDA deposit products intended primarily for individuals for personal, household, or family use .....   | P756                        | M.7.a.(1) |
| (2) Deposits in all other MMDAs of individuals, partnerships, and corporations .....  | P757                        | M.7.a.(2) |
| b. Other savings deposit accounts of individuals, partnerships, and corporations (sum of Memorandum items 7.b.(1) and 7.b.(2) must be less than or equal to Schedule RC-E, Memorandum item 2.a.(2) above):  |                             |           |
| (1) Total deposits in those other savings deposit account deposit products intended primarily for individuals for personal, household, or family use .....  | P758                        | M.7.b.(1) |
| (2) Deposits in all other savings deposit accounts of individuals, partnerships, and corporations..   | P759                        | M.7.b.(2) |

## Schedule RC-F—Other Assets<sup>1</sup>

|  | Dollar Amounts in Thousands | RCON | Amount |       |
|--|-----------------------------|------|--------|-------|
| 1. Accrued interest receivable <sup>2</sup> .....  |                             | B556 |        | 1.    |
| 2. Net deferred tax assets <sup>3</sup> .....  |                             | 2148 |        | 2.    |
| 3. Interest-only strips receivable (not in the form of a security) <sup>4</sup> .....                                  |                             | HT80 |        | 3.    |
| 4. Equity investments without readily determinable fair values <sup>5</sup> .....                                      |                             | 1752 |        | 4.    |
| 5. Life insurance assets:  |                             |      |        |       |
| a. General account life insurance assets .....   |                             | K201 |        | 5.a.  |
| b. Separate account life insurance assets .....  |                             | K202 |        | 5.b.  |
| c. Hybrid account life insurance assets .....  |                             | K270 |        | 5.c.  |
| <i>Items 6.a through 6.j are to be completed semiannually in the June and December reports only.</i>                   |                             |      |        |       |
| 6. All other assets<br>(itemize and describe amounts greater than \$100,000 that exceed 25 percent of this item) ..... | 2168                        |      |        | 6.    |
| a. Prepaid expenses .....  | 2166                        |      |        | 6.a.  |
| b. Repossessed personal property (including vehicles) .....  | 1578                        |      |        | 6.b.  |
| c. Derivatives with a positive fair value held for purposes other than trading ...                                     | C010                        |      |        | 6.c.  |
| d. Not applicable  |                             |      |        |       |
| e. Computer software .....   | FT33                        |      |        | 6.e.  |
| f. Accounts receivable .....   | FT34                        |      |        | 6.f.  |
| g. Receivables from foreclosed government-guaranteed mortgage loans .....  | FT35                        |      |        | 6.g.  |
| h. <small>TEXT</small><br>3549   | 3549                        |      |        | 6.h.  |
| i. <small>TEXT</small><br>3550   | 3550                        |      |        | 6. i. |
| j. <small>TEXT</small><br>3551   | 3551                        |      |        | 6. j. |
| 7. Total (sum of items 1 through 6) (must equal Schedule RC, item 11) .....  | 2160                        |      |        | 7.    |

1. Institutions should report asset amounts in Schedule RC-F net of any applicable allowance for credit losses.
2. Include accrued interest receivable on loans, leases, debt securities, and other interest-bearing assets. Exclude accrued interest receivable on interest-bearing assets that is reported elsewhere on the balance sheet.
3. See discussion of deferred income taxes in Glossary entry on "**Income Taxes.**"
4. Report interest-only strips receivable in the form of a security as available-for-sale securities in Schedule RC, item 2.b, or as trading assets in Schedule RC, item 5, as appropriate.
5. Include Federal Reserve stock, Federal Home Loan Bank stock, and bankers' bank stock.

## Schedule RC-G—Other Liabilities

|   | Dollar Amounts in Thousands | RCON | Amount |       |
|---|-----------------------------|------|--------|-------|
| 1. a. Interest accrued and unpaid on deposits <sup>1</sup> .....  |                             | 3645 |        | 1.a.  |
| b. Other expenses accrued and unpaid (includes accrued income taxes payable) .....  |                             | 3646 |        | 1.b.  |
| 2. Net deferred tax liabilities <sup>2</sup> .....  |                             | 3049 |        | 2.    |
| 3. Allowance for credit losses on off-balance-sheet credit exposures .....  |                             | B557 |        | 3.    |
| <i>Items 4.a through 4.h are to be completed semiannually in the June and December reports only.</i>                        |                             |      |        |       |
| 4. All other liabilities<br>(itemize and describe amounts greater than \$100,000 that exceed 25 percent of this item) ..... | 2938                        |      |        | 4.    |
| a. Accounts payable .....   | 3066                        |      |        | 4.a.  |
| b. Deferred compensation liabilities .....  | C011                        |      |        | 4.b.  |
| c. Dividends declared but not yet payable .....   | 2932                        |      |        | 4.c.  |
| d. Derivatives with a negative fair value held for purposes other than trading ..   | C012                        |      |        | 4.d.  |
| e. Operating lease liabilities .....  | LB56                        |      |        | 4.e.  |
| f. <small>TEXT</small><br>3552  | 3552                        |      |        | 4. f. |
| g. <small>TEXT</small><br>3553  | 3553                        |      |        | 4.g.  |
| h. <small>TEXT</small><br>3554  | 3554                        |      |        | 4.h.  |
| 5. Total (sum of items 1 through 4) (must equal Schedule RC, item 20) .....   | 2930                        |      |        | 5.    |

1. For savings banks, include "dividends" accrued and unpaid on deposits.
2. See discussion of deferred income taxes in Glossary entry on "**Income Taxes.**"

## Schedule RC-K—Quarterly Averages<sup>1</sup>

|  | Dollar Amounts in Thousands |         |
|--|-----------------------------|---------|
|  | RCON                        | Amount  |
| <b>Assets</b>  |                             |         |
| 1. Interest-bearing balances due from depository institutions .....  | 3381                        | 1.      |
| 2. U.S. Treasury securities and U.S. Government agency obligations <sup>2</sup><br>( <i>excluding mortgage-backed securities</i> ) .....                             | B558                        | 2.      |
| 3. Mortgage-backed securities <sup>2</sup> .....   | B559                        | 3.      |
| 4. All other debt securities <sup>2</sup> and equity securities with readily determinable fair values not held<br>for trading <sup>3</sup> .....                     | B560                        | 4.      |
| 5. Federal funds sold and securities purchased under agreements to resell .....  | 3365                        | 5.      |
| 6. Loans:  |                             |         |
| a. Total loans .....   | 3360                        | 6.a.    |
| b. Loans secured by real estate:   |                             |         |
| (1) Loans secured by 1–4 family residential properties .....   | 3465                        | 6.b.(1) |
| (2) All other loans secured by real estate .....   | 3466                        | 6.b.(2) |
| c. Commercial and industrial loans .....   | 3387                        | 6.c.    |
| d. Loans to individuals for household, family, and other personal expenditures:  |                             |         |
| (1) Credit cards .....   | B561                        | 6.d.(1) |
| (2) Other (includes revolving credit plans other than credit cards, automobile loans,<br>and other consumer loans) .....   | B562                        | 6.d.(2) |
| 7. Not applicable .....  |                             |         |
| 8. Lease financing receivables (net of unearned income) .....  | 3484                        | 8.      |
| 9. Total assets <sup>4</sup> .....   | 3368                        | 9.      |
| <b>Liabilities</b>   |                             |         |
| 10. Interest-bearing transaction accounts (interest-bearing demand deposits, NOW accounts,<br>ATS accounts, and telephone and preauthorized transfer accounts) ..... | 3485                        | 10.     |
| 11. Nontransaction accounts:   |                             |         |
| a. Savings deposits ( <i>includes MMDAs</i> ) .....  | B563                        | 11.a.   |
| b. Time deposits of \$250,000 or less .....  | HK16                        | 11.b.   |
| c. Time deposits of more than \$250,000 .....  | HK17                        | 11.c.   |
| 12. Federal funds purchased and securities sold under agreements to repurchase .....   | 3353                        | 12.     |
| 13. <i>To be completed by banks with \$100 million or more in total assets:</i> <sup>5</sup><br>Other borrowed money (includes mortgage indebtedness) .....          | 3355                        | 13.     |

### Memorandum

|   | Dollar Amounts in Thousands |        |
|---|-----------------------------|--------|
|   | RCON                        | Amount |
| <i>Memorandum item 1 is to be completed by:</i> <sup>5</sup>  |                             |        |
| • <i>banks with \$300 million or more in total assets, and</i><br>• <i>banks with less than \$300 million in total assets that have loans to finance agricultural<br/>production and other loans to farmers (Schedule RC-C, Part 1, item 3) exceeding 5 percent<br/>of total loans.</i> |                             |        |
| 1. Loans to finance agricultural production and other loans to farmers .....  | 3386                        | M.1.   |

1. For all items, banks have the option of reporting either (1) an average of *DAILY* figures for the quarter, or (2) an average of *WEEKLY* figures (i.e., the Wednesday of each week of the quarter).
2. Quarterly averages for all debt securities should be based on amortized cost.
3. Quarterly averages for equity securities with readily determinable fair values should be based on fair value.
4. The quarterly average for total assets should reflect securities not held for trading as follows:
  - a) Debt securities at amortized cost.
  - b) Equity securities with readily determinable fair values at fair value.
  - c) Equity investments without readily determinable fair values at their balance sheet carrying values (i.e., fair value or, if elected, cost minus impairment, if any, plus or minus changes resulting from observable price changes).
5. The asset-size tests and the 5 percent of total loans test are based on the total assets and total loans reported on the *June 30, 2024, Report of Condition*.

## Schedule RC-L—Off-Balance-Sheet Items

Please read carefully the instructions for the preparation of Schedule RC-L. Some of the amounts reported in Schedule RC-L are regarded as volume indicators and not necessarily as measures of risk.

|   |  | Dollar Amounts in Thousands | RCON | Amount                |
|---|--|-----------------------------|------|-----------------------|
| 1. Unused commitments:  |  |                             |      |                       |
| a. Revolving, open-end lines secured by 1–4 family residential properties, e.g., home equity lines....  |  | 3814                        |      | 1.a.                  |
| b. Credit card lines .....  |  | 3815                        |      | 1.b.                  |
| c. Commitments to fund commercial real estate, construction, and land development loans:  |  |                             |      |                       |
| (1) Secured by real estate:   |  |                             |      |                       |
| (a) 1–4 family residential construction loan commitments .....  |  | F164                        |      | 1.c.(1)(a)            |
| (b) Commercial real estate, other construction loan, and land development loan<br>commitments .....   |  |                             |      |                       |
| (2) NOT secured by real estate .....  |  | 6550                        |      | 1.c.(1)(b)<br>1.c.(2) |
| d. Not applicable   |  |                             |      |                       |
| e. Other unused commitments:  |  |                             |      |                       |
| (1) Commercial and industrial loans .....   |  | J457                        |      | 1.e.(1)               |
| (2) Loans to depository financial institutions.....   |  | PV10                        |      | 1.e.(2)               |
| (3) Loans to nondepository financial institutions.....  |  | PV11                        |      | 1.e.(3)               |
| (4) All other unused commitments .....  |  | J459                        |      | 1.e.(4)               |
| 2. Financial standby letters of credit.....   |  | 3819                        |      | 2.                    |
| 3. Performance standby letters of credit .....  |  | 3821                        |      | 3.                    |
| 4. Commercial and similar letters of credit.....  |  | 3411                        |      | 4.                    |
| 5. Not applicable   |  |                             |      |                       |
| 6. Securities lent and borrowed:  |  |                             |      |                       |
| a. Securities lent (including customers' securities lent where the customer is indemnified against<br>loss by the reporting bank) .....   |  | 3433                        |      | 6.a.                  |
| b. Securities borrowed.....   |  | 3432                        |      | 6.b.                  |
| 7. and 8. Not applicable  |  |                             |      |                       |
| <i>Items 9.c through 9.f and 10.b through 10.e are to be completed semiannually in the June and December reports only.</i>  |  |                             |      |                       |
| 9. All other off-balance-sheet liabilities (exclude derivatives) (itemize and describe each<br>component of this item over 25 percent of Schedule RC, item 27.a, "Total bank equity capital") ...   |  | 3430                        |      | 9.                    |
| a. and b. Not applicable  |  |                             |      |                       |
| c. Standby letters of credit issued by another party<br>(e.g., a Federal Home Loan Bank) on the bank's behalf .....   |  | C978                        |      | 9.c.                  |
| d. TEXT<br>3555   |  | 3555                        |      | 9.d.                  |
| e. TEXT<br>3556   |  | 3556                        |      | 9.e.                  |
| f. TEXT<br>3557   |  | 3557                        |      | 9.f.                  |
| 10. All other off-balance-sheet assets (exclude derivatives) (itemize and<br>describe each component of this item over 25 percent of Schedule<br>RC, item 27.a, "Total bank equity capital"): ..... |  | 5591                        |      | 10.                   |
| a. Not applicable   |  |                             |      |                       |
| b. TEXT<br>5592   |  | 5592                        |      | 10.b.                 |
| c. TEXT<br>5593   |  | 5593                        |      | 10.c.                 |
| d. TEXT<br>5594   |  | 5594                        |      | 10.d.                 |
| e. TEXT<br>5595   |  | 5595                        |      | 10.e.                 |
| <i>Items 11.a and 11.b are to be completed semiannually in the June and December reports only.</i>  |  |                             |      |                       |
| 11. Year-to-date merchant credit card sales volume:   |  |                             |      |                       |
| a. Sales for which the reporting bank is the acquiring bank.....  |  | C223                        |      | 11.a.                 |
| b. Sales for which the reporting bank is the agent bank with risk.....  |  | C224                        |      | 11.b.                 |

## Schedule RC-M—Memoranda

|   | Dollar Amounts in Thousands |            |
|---|-----------------------------|------------|
|   | RCON                        | Amount     |
| 1. Extensions of credit by the reporting bank to its executive officers, directors, principal shareholders, and their related interests as of the report date:  |                             |            |
| a. Aggregate amount of all extensions of credit to all executive officers, directors, principal shareholders, and their related interests .....   | 6164                        | 1.a.       |
| b. Number of executive officers, directors, and principal shareholders to whom the amount of all extensions of credit by the reporting bank (including extensions of credit to related interests) equals or exceeds the lesser of \$500,000 or 5 percent of total capital as defined for this purpose in agency regulations ... | 6165                        | 1.b.       |
| 2. Intangible assets:   | 3164                        |            |
| a. Mortgage servicing assets .....  | A590                        | 2.a.       |
| (1) Estimated fair value of mortgage servicing assets .....   |                             | 2.a.(1)    |
| b. Goodwill.....  | 3163                        | 2.b.       |
| c. All other intangible assets .....  | JF76                        | 2.c.       |
| d. Total (sum of items 2.a, 2.b, and 2.c) (must equal Schedule RC, item 10).....  | 2143                        | 2.d.       |
| 3. Other real estate owned:   | 5508                        | 3.a.       |
| a. Construction, land development, and other land .....   | 5509                        | 3.b.       |
| b. Farmland .....   | 5510                        | 3.c.       |
| c. 1–4 family residential properties .....  | 5511                        | 3.d.       |
| d. Multifamily (5 or more) residential properties.....  | 5512                        | 3.e.       |
| e. Nonfarm nonresidential properties .....  | 2150                        | 3.f.       |
| 4. Cost of equity securities with readily determinable fair values not held for trading (the fair value of which is reported in Schedule RC, item 2.c) <sup>1</sup> .....   | JA29                        | 4.         |
| 5. Other borrowed money:  |                             |            |
| a. Federal Home Loan Bank advances:   |                             |            |
| (1) Advances with a remaining maturity or next repricing date of: <sup>2</sup>  |                             |            |
| (a) One year or less.....   | F055                        | 5.a.(1)(a) |
| (b) Over one year through three years.....  | F056                        | 5.a.(1)(b) |
| (c) Over three years through five years.....  | F057                        | 5.a.(1)(c) |
| (d) Over five years .....   | F058                        | 5.a.(1)(d) |
| (2) Advances with a REMAINING MATURITY of one year or less (included in item 5.a.(1)(a) above) <sup>3</sup> .....   | 2651                        | 5.a.(2)    |
| (3) Structured advances (included in items 5.a.(1)(a)–(d) above).....   | F059                        | 5.a.(3)    |
| b. Other borrowings:  |                             |            |
| (1) Other borrowings with a remaining maturity or next repricing date of: <sup>4</sup>  |                             |            |
| (a) One year or less.....   | F060                        | 5.b.(1)(a) |
| (b) Over one year through three years.....  | F061                        | 5.b.(1)(b) |
| (c) Over three years through five years.....  | F062                        | 5.b.(1)(c) |
| (d) Over five years .....   | F063                        | 5.b.(1)(d) |
| (2) Other borrowings with a REMAINING MATURITY of one year or less (included in item 5.b.(1)(a) above) <sup>5</sup> .....   | B571                        | 5.b.(2)    |
| c. Total  | 3190                        | 5.c.       |
| (sum of items 5.a.(1)(a)–(d) and items 5.b.(1)(a)–(d)) (must equal Schedule RC, item 16) ...  |                             |            |

1. Item 4 is to be completed only by insured state banks that have been approved by the FDIC to hold grandfathered equity investments. See instructions for this item and the Glossary entry for "Securities Activities" for further detail on accounting for investments in equity securities.
2. Report fixed-rate advances by remaining maturity and floating-rate advances by next repricing date.
3. Report both fixed- and floating-rate advances by remaining maturity. Exclude floating-rate advances with a next repricing date of one year or less that have a remaining maturity of over one year.
4. Report fixed-rate other borrowings by remaining maturity and floating-rate other borrowings by next repricing date.
5. Report both fixed- and floating-rate other borrowings by remaining maturity. Exclude floating-rate other borrowings with a next repricing date of one year or less that have a remaining maturity of over one year.

## Schedule RC-M—Continued

Items 6 and 7 are to be completed annually in the December report only.

|     |  | Dollar Amounts in Thousands |         | RCON | Yes    |  | No |
|-----|--|-----------------------------|---------|------|--------|--|----|
| 6.  | Does the reporting bank sell private label or third-party mutual funds and annuities? .....  | B569                        |         |      |        |  |    |
| 7.  | Assets under the reporting bank's management in proprietary mutual funds and annuities .....   | B570                        |         | RCON | Amount |  |    |
| 8.  | Internet website addresses and physical office trade names:  |                             |         |      |        |  |    |
| a.  | Uniform Resource Locator (URL) of the reporting institution's primary Internet website (home page), if any<br>(Example: www.examplebank.com):  | TEXT<br>4087                | http:// |      |        |  |    |
| b.  | URLs of all other public-facing Internet websites that the reporting institution uses to accept or solicit deposits from the public, if any (Example: www.examplebank.biz): <sup>1</sup>               | (1) TE01<br>N528            | http:// |      |        |  |    |
|     |  | (2) TE02<br>N528            | http:// |      |        |  |    |
|     |  | (3) TE03<br>N528            | http:// |      |        |  |    |
|     |  | (4) TE04<br>N528            | http:// |      |        |  |    |
|     |  | (5) TE05<br>N528            | http:// |      |        |  |    |
|     |  | (6) TE06<br>N528            | http:// |      |        |  |    |
|     |  | (7) TE07<br>N528            | http:// |      |        |  |    |
|     |  | (8) TE08<br>N528            | http:// |      |        |  |    |
|     |  | (9) TE09<br>N528            | http:// |      |        |  |    |
|     |  | (10) TE10<br>N528           | http:// |      |        |  |    |
| c.  | Trade names other than the reporting institution's legal title used to identify one or more of the institution's physical offices at which deposits are accepted or solicited from the public, if any: | (1) TE01<br>N529            |         |      |        |  |    |
|     |  | (2) TE02<br>N529            |         |      |        |  |    |
|     |  | (3) TE03<br>N529            |         |      |        |  |    |
|     |  | (4) TE04<br>N529            |         |      |        |  |    |
|     |  | (5) TE05<br>N529            |         |      |        |  |    |
|     |  | (6) TE06<br>N529            |         |      |        |  |    |
| 9.  | Do any of the bank's Internet websites have transactional capability, i.e., allow the bank's customers to execute transactions on their accounts through the website? .....                            | RCON                        | Yes     |      | No     |  |    |
|     |  | 4088                        |         |      |        |  |    |
| 10. | Secured liabilities:   |                             |         |      |        |  |    |
| a.  | Amount of "Federal funds purchased" that are secured<br>(included in Schedule RC, item 14.a) .....   | RCON                        | Amount  |      |        |  |    |
|     |  | F064                        |         |      |        |  |    |
| b.  | Amount of "Other borrowings" that are secured<br>(included in Schedule RC-M, items 5.b.(1)(a)–(d)) .....   | RCON                        | Amount  |      |        |  |    |
|     |  | F065                        |         |      |        |  |    |
| 11. | Does the bank act as trustee or custodian for Individual Retirement Accounts, Health Savings Accounts, and other similar accounts? .....   | RCON                        | Yes     |      | No     |  |    |
|     |  | G463                        |         |      |        |  |    |
| 12. | Does the bank provide custody, safekeeping, or other services involving the acceptance of orders for the sale or purchase of securities? .....   | RCON                        | Yes     |      | No     |  |    |
|     |  | G464                        |         |      |        |  |    |
| 13. | Not applicable   | RCON                        | Amount  |      |        |  |    |
| 14. | Captive insurance and reinsurance subsidiaries:  | K193                        |         |      |        |  |    |
| a.  | Total assets of captive insurance subsidiaries <sup>2</sup> .....  | K194                        |         |      |        |  |    |
| b.  | Total assets of captive reinsurance subsidiaries .....   |                             |         |      |        |  |    |

1. Report only highest level URLs (for example, report www.examplebank.biz, but do not also report www.examplebank.biz/checking). Report each top level domain name used (for example, report both www.examplebank.biz and www.examplebank.net).  
2. Report total assets before eliminating intercompany transactions between the consolidated insurance or reinsurance subsidiary and other offices or consolidated subsidiaries of the reporting bank.

## Schedule RC-M—Continued

*Item 15 is to be completed by institutions that are required or have elected to be treated as a Qualified Thrift Lender.*

|   |   | Dollar Amounts in Thousands |        |          |
|---|---|-----------------------------|--------|----------|
|   |   | RCON                        | Number |          |
| 15. Qualified Thrift Lender (QTL) test:   | a. Does the institution use the Home Owners' Loan Act (HOLA) QTL test or the Internal Revenue Service Domestic Building and Loan Association (IRS DBLA) test to determine its QTL compliance? (for the HOLA QTL test, enter 1; for the IRS DBLA test, enter 2)..... | L133                        |        | 15.a.    |
|   | b. Has the institution been in compliance with the HOLA QTL test as of each month end during the quarter or the IRS DBLA test for its most recent taxable year, as applicable?.....   |                             | Yes    |          |
|   |   | L135                        | No     | 15.b.    |
| 16. International remittance transfers offered to consumers: <sup>1</sup>   | a. Estimated number of international remittance transfers provided by your institution during the calendar year ending on the report date.....  | N523                        |        | 16.a.    |
|   | b. Estimated dollar value of remittance transfers provided by your institution and usage of regulatory exceptions during the calendar year ending on the report date:   |                             | Amount |          |
|   | (1) Estimated dollar value of international remittance transfers .....  | N524                        |        | 16.b.(1) |
|   | (2) Estimated number of international remittance transfers for which your institution applied the permanent exchange rate exception .....   | MM07                        |        | 16.b.(2) |
|   | (3) Estimated number of international remittance transfers for which your institution applied the permanent covered third-party fee exception .....   | MQ52                        |        | 16.b.(3) |
| 17. U.S. Small Business Administration Paycheck Protection Program (PPP) loans <sup>2</sup> and the Federal Reserve PPP Liquidity Facility (PPPLF): | a. Number of PPP loans outstanding .....  | LG26                        |        | 17.a.    |
|   | b. Outstanding balance of PPP loans .....   | LG27                        | Amount | 17.b.    |
|   | c. Outstanding balance of PPP loans pledged to the PPPLF .....  | LG28                        | Number | 17.c.    |
|   | d. Outstanding balance of borrowings from Federal Reserve Banks under the PPPLF with a remaining maturity of:   |                             |        |          |
|   | (1) One year or less.....   | LL59                        |        | 17.d.(1) |
|   | (2) More than one year .....  | LL60                        |        | 17.d.(2) |
|   | e. Quarterly average amount of PPP loans pledged to the PPPLF and excluded from "Total assets for the leverage ratio" reported in Schedule RC-R, Part I, item 30 .....  | LL57                        |        | 17.e.    |

1. Report information about international electronic transfers of funds offered to consumers in the United States that:

- (a) are "remittance transfers" as defined by subpart B of Regulation E (12 CFR § 1005.30(e)), or
- (b) would qualify as "remittance transfers" under subpart B of Regulation E (12 CFR § 1005.30(e)) but are excluded from that definition only because the provider is not providing those transfers in the normal course of its business. See 12 CFR § 1005.30(f).

For purposes of this item 16, such transfers are referred to as international remittance transfers.

Exclude transfers sent by your institution as a correspondent bank for other providers. Report information only about transfers for which the reporting institution is the provider.

2. Paycheck Protection Program (PPP) covered loans as defined in sections 7(a)(36) and 7(a)(37) of the Small Business Act (15 U.S.C. 636(a)(36) and (37)).

## Schedule RC-N—Past Due and Nonaccrual Loans, Leases, and Other Assets

| Dollar Amounts in Thousands  | (Column A)<br>Past due<br>30 through 89<br>days and still<br>accruing |        | (Column B)<br>Past due 90<br>days or more<br>and still<br>accruing |        | (Column C)<br>Nonaccrual |        |
|--|---|--------|--|--------|--------------------------|--------|
|  | RCON  | Amount | RCON   | Amount | RCON                     | Amount |
| 1. Loans secured by real estate:   |   |        |  |        |                          |        |
| a. Construction, land development, and other land loans:   |   |        |  |        |                          |        |
| (1) 1–4 family residential construction loans .....  | F172  |        | F174   |        | F176                     |        |
| (2) Other construction loans and all land development and other land loans .....                                   | F173  |        | F175   |        | F177                     |        |
| b. Secured by farmland .....   | 3493  |        | 3494   |        | 3495                     |        |
| c. Secured by 1–4 family residential properties:   |   |        |  |        |                          |        |
| (1) Revolving, open-end loans secured by 1–4 family residential properties and extended under lines of credit..... | 5398  |        | 5399   |        | 5400                     |        |
| (2) Closed-end loans secured by 1–4 family residential properties:   |   |        |  |        |                          |        |
| (a) Secured by first liens .....   | C236  |        | C237   |        | C229                     |        |
| (b) Secured by junior liens.....   | C238  |        | C239   |        | C230                     |        |
| d. Secured by multifamily (5 or more) residential properties .....   | 3499  |        | 3500   |        | 3501                     |        |
| e. Secured by nonfarm nonresidential properties:   |   |        |  |        |                          |        |
| (1) Loans secured by owner-occupied nonfarm nonresidential properties .....  | F178  |        | F180   |        | F182                     |        |
| (2) Loans secured by other nonfarm nonresidential properties .....   | F179  |        | F181   |        | F183                     |        |
| 2. Loans to depository institutions and acceptances of other banks .....   | B834  |        | B835   |        | B836                     |        |
| 3. Not applicable  |   |        |  |        |                          |        |
| 4. Commercial and industrial loans .....   | 1606  |        | 1607   |        | 1608                     |        |
| 5. Loans to individuals for household, family, and other personal expenditures:                                    |   |        |  |        |                          |        |
| a. Credit cards .....  | B575  |        | B576   |        | B577                     |        |
| b. Automobile loans .....  | K213  |        | K214   |        | K215                     |        |
| c. Other (includes revolving credit plans other than credit cards and other consumer loans).....                   | K216  |        | K217   |        | K218                     |        |
| 6. Not applicable  |   |        |  |        |                          |        |
| 7. All other loans <sup>1</sup> .....  | 5459  |        | 5460   |        | 5461                     |        |
| 8. Lease financing receivables .....   | 1226  |        | 1227   |        | 1228                     |        |
| 9. Total loans and leases (sum of items 1 through 8).....  | 1406  |        | 1407   |        | 1403                     |        |
| 10. Debt securities and other assets (exclude other real estate owned and other repossessed assets).....           | 3505  |        | 3506   |        | 3507                     |        |

1. Includes past due and nonaccrual "Loans to finance agricultural production and other loans to farmers," "Obligations (other than securities and leases) of states and political subdivisions in the U.S.," and "Loans to nondepository financial institutions and other loans."

## Schedule RC-N—Continued

Amounts reported by loan and lease category in Schedule RC-N, items 1 through 8, include guaranteed and unguaranteed portions of past due and nonaccrual loans and leases. Report in item 11 **and** 12 below certain guaranteed loans and leases that have already been included in the amounts reported in items 1 through 8.

| Dollar Amounts in Thousands   | (Column A)<br>Past due<br>30 through 89<br>days and still<br>accruing |        | (Column B)<br>Past due 90<br>days or more<br>and still<br>accruing |        | (Column C)<br>Nonaccrual |        |
|---|---|--------|--|--------|--------------------------|--------|
|   | RCON  | Amount | RCON   | Amount | RCON                     | Amount |
| 11. Loans and leases reported in items 1 through 8 above that are wholly or partially guaranteed by the U.S. Government, excluding loans and leases covered by loss-sharing agreements with the FDIC..... | K036  |        | K037   |        | K038                     |        |
| a. Guaranteed portion of loans and leases included in item 11 above, excluding rebooked "GNMA loans" .....  | K039  |        | K040   |        | K041                     |        |
| b. Rebooked "GNMA loans" that have been repurchased or are eligible for repurchase included in item 11 above .....  | K042  |        | K043   |        | K044                     |        |
| 12. Portion of covered loans and leases reported in item 9 above that is protected by FDIC loss-sharing agreements.....   |   | K103   |  | K104   |                          |        |

## Memoranda

| Dollar Amounts in Thousands  | (Column A)<br>Past due<br>30 through 89<br>days and still<br>accruing |        | (Column B)<br>Past due 90<br>days or more<br>and still<br>accruing |        | (Column C)<br>Nonaccrual |        |
|--|---|--------|--|--------|--------------------------|--------|
|  | RCON  | Amount | RCON   | Amount | RCON                     | Amount |
| <i>Memorandum items 1.a.(1) through 1.f.(5) are to be completed semiannually in the June and December reports only. Memorandum item 1.g is to be completed quarterly.</i>                |   |        |  |        |                          |        |
| 1. Loan modifications to borrowers experiencing financial difficulty included in Schedule RC-N, items 1 through 7, above (and not reported in Schedule RC-C, Part I, Memorandum item 1): |   |        |  |        |                          |        |
| a. Construction, land development, and other land loans:   |   |        |  |        |                          |        |
| (1) 1–4 family residential construction loans.....   | K105  |        | K106   |        | K107                     |        |
| (2) Other construction loans and all land development and other land loans.....  | K108  |        | K109   |        | K110                     |        |
| b. Loans secured by 1–4 family residential properties.....   | F661  |        | F662   |        | F663                     |        |
| c. Secured by multifamily (5 or more) residential properties .....   | K111  |        | K112   |        | K113                     |        |
| d. Secured by nonfarm nonresidential properties:   |   |        |  |        |                          |        |
| (1) Loans secured by owner-occupied nonfarm nonresidential properties .....  | K114  |        | K115   |        | K116                     |        |
| (2) Loans secured by other nonfarm nonresidential properties.....  | K117  |        | K118   |        | K119                     |        |
| e. Commercial and industrial loans .....   | K257  |        | K258   |        | K259                     |        |

## Schedule RC-N—Continued

### Memoranda—Continued

| Dollar Amounts in Thousands   | (Column A)<br>Past due<br>30 through 89<br>days and still<br>accruing |        | (Column B)<br>Past due 90<br>days or more<br>and still<br>accruing |        | (Column C)<br>Nonaccrual |        |
|---|---|--------|--|--------|--------------------------|--------|
|   | RCON  | Amount | RCON   | Amount | RCON                     | Amount |
| 1. f. All other loans ( <i>include</i> loans to individuals for household, family, and other personal expenditures).....  |   |        |  |        |                          |        |
|   | K126  |        | K127   |        | K128                     |        |
| <i>Itemize loan categories included in Memorandum item 1.f. above that exceed 10 percent of total loan modifications to borrowers experiencing financial difficulty that are past due 30 days or more or in nonaccrual status (sum of Memorandum items 1.a through 1.f, columns A through C):</i> |   |        |  |        |                          |        |
| (1) Loans secured by farmland .....   | K130  |        | K131   |        | K132                     |        |
| (2) and (3) Not applicable  |   |        |  |        |                          |        |
| (4) Loans to individuals for household family, and other personal expenditures:   |   |        |  |        |                          |        |
| (a) Credit cards .....  | K274  |        | K275   |        | K276                     |        |
| (b) Automobile loans .....  | K277  |        | K278   |        | K279                     |        |
| (c) Other (includes revolving credit plans other than credit cards and other consumer loans).....   | K280  |        | K281   |        | K282                     |        |
| <i>Memorandum item 1.f.(5) is to be completed by:<sup>1</sup></i>   |   |        |  |        |                          |        |
| • Banks with \$300 million or more in total assets  |   |        |  |        |                          |        |
| • Banks with less than \$300 million in total assets that have loans to finance agricultural production and other loans to farmers (Schedule RC-C, Part I, item 3) exceeding 5 percent of total loans   |   |        |  |        |                          |        |
| (5) Loans to finance agricultural production and other loans to farmers .....   | K138  |        | K139   |        | K140                     |        |
| 1.g. Total loan modifications to borrowers experiencing financial difficulty included in Schedule RC-N, items 1 through 7, above (sum of Memorandum items 1.a.(1) through 1.f) <sup>2</sup> .....   |   |        |  |        |                          |        |
|   | HK26  |        | HK27   |        | HK28                     |        |
| 2. Loans to finance commercial real estate, construction, and land development activities (not secured by real estate) included in Schedule RC-N, items 4 and 7, above .....  |   |        |  |        |                          |        |
| 3. Not applicable   | 6558  |        | 6559   |        | 6560                     |        |

1. The \$300 million asset-size test and the 5 percent of total loans test are based on the total assets and total loans reported on the June 30, 2024, Report of Condition.

2. Exclude amounts reported in Memorandum items 1.f.(1) through 1.f.(5) when calculating the total in Memorandum item 1.g.

## Schedule RC-N—Continued

### Memoranda—Continued

| Dollar Amounts in Thousands   | (Column A)<br>Past due<br>30 through 89<br>days and still<br>accruing |        | (Column B)<br>Past due 90<br>days or more<br>and still<br>accruing |        | (Column C)<br>Nonaccrual |        |
|---|---|--------|--|--------|--------------------------|--------|
|   | RCON  | Amount | RCON   | Amount | RCON                     | Amount |
| <i>Memorandum item 4 is to be completed by:<sup>1</sup></i>   |   |        |  |        |                          |        |
| • <i>banks with \$300 million or more in total assets</i>   |   |        |  |        |                          |        |
| • <i>banks with less than \$300 million in total assets that have loans to finance agricultural production and other loans to farmers (Schedule RC-C, Part I, item 3) exceeding 5 percent of total loans:</i> |   |        |  |        |                          |        |
| 4. Loans to finance agricultural production and other loans to farmers (included in Schedule RC-N, item 7, above) .....   | 1594  |        | 1597   |        | 1583                     |        |
| <i>Memorandum item 5 is to be completed semi-annually in the June and December reports only.</i>  |   |        |  |        |                          |        |
| 5. Loans and leases held for sale (included in Schedule RC-N, items 1 through 8, above) ..  | C240  |        | C241   |        | C226                     |        |
| 6. Not applicable   |   |        |  |        |                          |        |

*Memorandum items 7 and 8 are to be completed semiannually in the June and December reports only.*

|  | RCON | Amount |
|--|------|--------|
| 7. Additions to nonaccrual assets during the previous six months ..... | C410 |        |
| 8. Nonaccrual assets sold during the previous six months .....         | C411 |        |

| Dollar Amounts in Thousands   | (Column A)<br>Past due<br>30 through 89<br>days and still<br>accruing |        | (Column B)<br>Past due 90<br>days or more<br>and still<br>accruing |        | (Column C)<br>Nonaccrual |        |
|---|---|--------|--|--------|--------------------------|--------|
|   | RCON  | Amount | RCON   | Amount | RCON                     | Amount |
| 9. Loans to nondepository financial institutions included in Schedule RC-N, item 7..... | PV23  |        | PV24   |        | PV25                     |        |

1. The \$300 million asset-size test and the 5 percent of total loans test are based on the total assets and total loans reported on the June 30, 2024, Report of Condition.

## Schedule RC-O—Other Data for Deposit Insurance Assessments

All FDIC-insured depository institutions must complete Schedule RC-O each quarter on an “unconsolidated single FDIC certificate number basis,” unless otherwise indicated (see instructions).

| Dollar Amounts in Thousands   | RCON | Amount |      |       |
|---|------|--------|------|-------|
| 1. Total deposit liabilities before exclusions (gross) as defined in Section 3(l) of the Federal Deposit Insurance Act and FDIC regulations .....   | F236 |        | 1.   |       |
| 2. Total allowable exclusions, including interest accrued and unpaid on allowable exclusions .....  | F237 |        | 2.   |       |
| 3. Not applicable   |      |        |      |       |
| 4. Average consolidated total assets for the calendar quarter.....  | K652 |        | 4.   |       |
| a. Averaging method used<br>(for daily averaging, enter 1, for weekly averaging, enter 2).....  | K653 |        | 4.a. |       |
| 5. Average tangible equity for the calendar quarter <sup>1</sup> .....  | K654 |        | 5.   |       |
| 6. Holdings of long-term unsecured debt issued by other FDIC-insured depository institutions .....  | K655 |        | 6.   |       |
| 7. Unsecured "Other borrowings" with a remaining maturity of (sum of items 7.a through 7.d must be less than or equal to Schedule RC-M, items 5.b.(1)(a)–(d) minus item 10.b):              |      |        |      |       |
| a. One year or less .....   | G465 |        | 7.a. |       |
| b. Over one year through three years .....  | G466 |        | 7.b. |       |
| c. Over three years through five years .....  | G467 |        | 7.c. |       |
| d. Over five years .....  | G468 |        | 7.d. |       |
| 8. Subordinated notes and debentures with a remaining maturity of<br>(sum of items 8.a. through 8.d. must equal Schedule RC, item 19):  |      |        |      |       |
| a. One year or less .....   | G469 |        | 8.a. |       |
| b. Over one year through three years .....  | G470 |        | 8.b. |       |
| c. Over three years through five years .....  | G471 |        | 8.c. |       |
| d. Over five years .....  | G472 |        | 8.d. |       |
| 9. Brokered reciprocal deposits (included in Schedule RC-E, Memorandum item 1.b) .....  | G803 |        | 9.   |       |
| <i>Item 9.a is to be completed on a fully consolidated basis by all institutions that own another insured depository institution.</i>   |      |        |      |       |
| a. Fully consolidated brokered reciprocal deposits.....   | L190 |        | 9.a. |       |
| 10. Banker's bank certification:<br>Does the reporting institution meet both the statutory definition of a banker's bank and the business conduct test set forth in FDIC regulations? ..... | K656 | Yes    | No   | 10.   |
| <i>If the answer to item 10 is "YES," complete items 10.a and 10.b.</i>   |      |        |      |       |
| a. Banker's bank deduction .....  | K657 |        |      | 10.a. |
| b. Banker's bank deduction limit .....  | K658 |        |      | 10.b. |
| 11. Custodial bank certification:<br>Does the reporting institution meet the definition of a custodial bank set forth in FDIC regulations? ...  | K659 | Yes    | No   | 11.   |
| <i>If the answer to item 11 is "YES," complete items 11.a and 11.b.<sup>2</sup></i>   |      |        |      |       |
| a. Custodial bank deduction .....   | K660 |        |      | 11.a. |
| b. Custodial bank deduction limit .....   | K661 |        |      | 11.b. |

1. See instructions for averaging methods. For deposit insurance assessment purposes, tangible equity is defined as Tier 1 capital as set forth in the banking agencies' regulatory capital standards and reported in Schedule RC-R, Part I, item 26, except as described in the instructions.

2. If the amount reported in item 11.b is zero, item 11.a may be left blank.

## Schedule RC-O—Continued

## Memoranda

| Dollar Amounts in Thousands  | RCON | Amount         |
|--|------|----------------|
| 1. Total deposit liabilities of the bank, including related interest accrued and unpaid, less allowable exclusions, including related interest accrued and unpaid (sum of Memorandum items 1.a.(1), 1.b.(1), 1.c.(1), and 1.d.(1) must equal Schedule RC-O, item 1 less item 2): |      |                |
| a. Deposit accounts (excluding retirement accounts) of \$250,000 or less: <sup>1</sup>   |      |                |
| (1) <i>Amount</i> of deposit accounts (excluding retirement accounts) of \$250,000 or less.....  | F049 |                |
| (2) <i>Number</i> of deposit accounts (excluding retirement accounts) of \$250,000 or less .....   | F050 |                |
| b. Deposit accounts (excluding retirement accounts) of more than \$250,000: <sup>1</sup>   |      |                |
| (1) <i>Amount</i> of deposit accounts (excluding retirement accounts) of more than \$250,000 .....   | F051 |                |
| (2) <i>Number</i> of deposit accounts (excluding retirement accounts) of more than \$250,000 .....   | F052 |                |
| c. Retirement deposit accounts of \$250,000 or less: <sup>1</sup>  |      |                |
| (1) <i>Amount</i> of retirement deposit accounts of \$250,000 or less .....  | F045 |                |
| (2) <i>Number</i> of retirement deposit accounts of \$250,000 or less.....   | F046 |                |
| d. Retirement deposit accounts of more than \$250,000: <sup>1</sup>  |      |                |
| (1) <i>Amount</i> of retirement deposit accounts of more than \$250,000 .....  | F047 |                |
| (2) <i>Number</i> of retirement deposit accounts of more than \$250,000 ....   | F048 |                |
| <i>Memorandum item 2 is to be completed by banks with \$1 billion or more in total assets.<sup>2</sup></i>   |      |                |
| 2. Estimated amount of uninsured deposits including related interest accrued and unpaid (see instructions) <sup>3</sup> .....  | 5597 |                |
| 3. Has the reporting institution been consolidated with a parent bank or savings association in that parent bank's or parent savings association's Call Report?<br>If so, report the legal title and FDIC Certificate Number of the parent bank or parent savings association:   |      |                |
| TEXT<br>A545   | RCON | FDIC Cert. No. |
|  | A545 |                |

1. The dollar amounts used as the basis for reporting in Memorandum items 1.a through 1.d reflect the deposit insurance limits in effect on the report date.
2. The \$1 billion asset-size test is based on the total assets reported on the *June 30, 2024*, Report of Condition.
3. Uninsured deposits should be estimated based on the deposit insurance limits set forth in Memorandum items 1.a through 1.d.

## Schedule RC-R—Regulatory Capital

### Part I. Regulatory Capital Components and Ratios

Part I is to be completed on a consolidated basis.

|  | Dollar Amounts in Thousands | RCOA  | Amount |      |
|--|-----------------------------|-------|--------|------|
| <b>Common Equity Tier 1 Capital</b>  |                             |       |        |      |
| 1. Common stock plus related surplus, net of treasury stock and unearned employee stock ownership plan (ESOP) shares.....  |                             |       |        |      |
|  | P742                        |       |        | 1.   |
| 2. Retained earnings <sup>1</sup> .....  |                             |       |        | 2.   |
| a. Does your institution have a CECL transition election in effect as of the quarter-end report date?<br>(enter "0" for No; enter "1" for Yes with a 3-year CECL transition election;<br>enter "2" for Yes with a 5-year 2020 CECL transition election.) .....   |                             | RCOA  | JJ29   | 2.a. |
| 3. Accumulated other comprehensive income (AOCI).....  |                             | RCOA  | Amount | 3.   |
|  |                             | B530  |        |      |
| a. AOCI opt-out election (enter "1" for Yes; enter "0" for No.) .....  |                             | 0=No  | RCOA   | 3.a. |
|  |                             | 1=Yes | P838   |      |
| 4. Common equity tier 1 minority interest includable in common equity tier 1 capital .....   |                             | RCOA  | Amount | 4.   |
| 5. Common equity tier 1 capital before adjustments and deductions (sum of items 1 through 4) .....   |                             | P839  |        | 5.   |
|  |                             | P840  |        |      |
| <b>Common Equity Tier 1 Capital: Adjustments and Deductions</b>  |                             |       |        |      |
| 6. LESS: Goodwill net of associated deferred tax liabilities (DTLs) .....  |                             | P841  |        | 6.   |
| 7. LESS: Intangible assets (other than goodwill and mortgage servicing assets (MSAs)), net of associated DTLs .....  |                             | P842  |        | 7.   |
| 8. LESS: Deferred tax assets (DTAs) that arise from net operating loss and tax credit carryforwards, net of any related valuation allowances and net of DTLs .....   |                             | P843  |        | 8.   |
| 9. AOCI-related adjustments (if entered "1" for Yes in item 3.a, complete only items 9.a through 9.e; if entered "0" for No in item 3.a, complete only item 9.f):  |                             |       |        |      |
| a. LESS: Net unrealized gains (losses) on available-for-sale debt securities (if a gain, report as a positive value; if a loss, report as a negative value) .....  |                             | P844  |        | 9.a. |
| b. Not applicable  |                             |       |        |      |
| c. LESS: Accumulated net gains (losses) on cash flow hedges (if a gain, report as a positive value; if a loss, report as a negative value) .....   |                             | P846  |        | 9.c. |
| d. LESS: Amounts recorded in AOCI attributed to defined benefit postretirement plans resulting from the initial and subsequent application of the relevant GAAP standards that pertain to such plans (if a gain, report as a positive value; if a loss, report as a negative value).....   |                             | P847  |        | 9.d. |
| e. LESS: Net unrealized gains (losses) on held-to-maturity securities that are included in AOCI (if a gain, report as a positive value; if a loss, report as a negative value).....  |                             | P848  |        | 9.e. |
| f. To be completed only by institutions that entered "0" for No in item 3.a:<br>LESS: Accumulated net gain (loss) on cash flow hedges included in AOCI, net of applicable income taxes, that relates to the hedging of items that are not recognized at fair value on the balance sheet (if a gain, report as a positive value; if a loss, report as a negative value) ..... |                             | P849  |        | 9.f. |

1. Institutions that have elected to apply the 3-year or the 5-year 2020 CECL transition provision should include the applicable portion of the CECL transitional amount or the modified CECL transitional amount, respectively, in this item.

## Schedule RC-R—Continued

### Part I—Continued

|  | Dollar Amounts in Thousands | RCOA | Amount |
|--|-----------------------------|------|--------|
| 10. Other deductions from (additions to) common equity tier 1 capital before threshold-based deductions:   |                             |      |        |
| a. LESS: Unrealized net gain (loss) related to changes in the fair value of liabilities that are due to changes in own credit risk (if a gain, report as a positive value; if a loss, report as a negative value)..... |                             | Q258 |        |
| b. LESS: All other deductions from (additions to) common equity tier 1 capital before threshold-based deductions.....  |                             | P850 |        |
| 11. Not applicable   |                             |      |        |
| 12. Subtotal (item 5 minus items 6 through 10.b).....  |                             | P852 |        |
| 13. LESS: Investments in the capital of unconsolidated financial institutions, net of associated DTLs, that exceed 25 percent of item 12.....  |                             | LB58 |        |
| 14. LESS: MSAs, net of associated DTLs, that exceed 25 percent of item 12 .....  |                             | LB59 |        |
| 15. LESS: DTAs arising from temporary differences that could not be realized through net operating loss carrybacks, net of related valuation allowances and net of DTLs, that exceed 25 percent of item 12 .....       |                             | LB60 |        |
| 16. Not applicable   |                             |      |        |
| 17. LESS: Deductions applied to common equity tier 1 capital due to insufficient amounts of additional tier 1 capital and tier 2 capital <sup>1</sup> to cover deductions.....   |                             | P857 |        |
| 18. Total adjustments and deductions for common equity tier 1 capital (sum of items 13 through 17) .....   |                             | P858 |        |
| 19. Common equity tier 1 capital (item 12 minus item 18) .....   |                             | P859 |        |
| <b>Additional Tier 1 Capital</b>   |                             |      |        |
| 20. Additional tier 1 capital instruments plus related surplus .....   |                             | P860 |        |
| 21. Non-qualifying capital instruments subject to phase-out from additional tier 1 capital.....  |                             | P861 |        |
| 22. Tier 1 minority interest not included in common equity tier 1 capital .....  |                             | P862 |        |
| 23. Additional tier 1 capital before deductions (sum of items 20, 21, and 22).....   |                             | P863 |        |
| 24. LESS: Additional tier 1 capital deductions .....   |                             | P864 |        |
| 25. Additional tier 1 capital (greater of item 23 minus item 24, or zero) .....  |                             | P865 |        |
| <b>Tier 1 Capital</b>  |                             |      |        |
| 26. Tier 1 capital (sum of items 19 and 25) .....  |                             | 8274 |        |
| <b>Total Assets for the Leverage Ratio</b>   |                             |      |        |
| 27. Average total consolidated assets <sup>2</sup> .....   |                             | KW03 |        |
| 28. LESS: Deductions from common equity tier 1 capital and additional tier 1 capital (sum of items 6, 7, 8, 10.b, 13 through 15, 17, and certain elements of item 24 - see instructions) .....                         |                             | P875 |        |
| 29. LESS: Other deductions from (additions to) assets for leverage ratio purposes .....  |                             | B596 |        |
| 30. Total assets for the leverage ratio (item 27 minus items 28 and 29).....   |                             | A224 |        |

1. An institution that has a CBLR framework election in effect as of the quarter-end report date is neither required to calculate tier 2 capital nor make any deductions that would have been taken from tier 2 capital as of the report date.

2. Institutions that have elected to apply the 3-year or the 5-year 2020 CECL transition provision should include the applicable portion of the CECL transitional amount or the modified CECL transitional amount, respectively, in item 27.

## Schedule RC-R—Continued

### Part I—Continued

#### Leverage Ratio\*

31. Tier 1 leverage ratio (item 26 divided by item 30).....

| RCOA | Percentage |
|------|------------|
| 7204 |            |

31.

a. Does your institution have a community bank leverage ratio (CBLR) framework election in effect as of the quarter-end report date? (enter "1" for Yes; enter "0" for No) .....

|       |      |
|-------|------|
| 0=No  | RCOA |
| 1=Yes | LE74 |

31.a.

If your institution entered "1" for Yes in item 31.a:

- Complete items 32 through 37 and, if applicable, items 38.a through 38.c,
- Do not complete items 39 through 54, and
- Do not complete Part II of Schedule RC-R.

If your institution entered "0" for No in item 31.a:

- Skip (do not complete) items 32 through 38.c,
- Complete items 39 through 54, as applicable, and
- Complete Part II of Schedule RC-R.

*Item 31.b is to be completed only by non-advanced approaches institutions that elect to use the Standardized Approach for Counterparty Credit Risk (SA-CCR) for purposes of the standardized approach.*

b. Standardized Approach for Counterparty Credit Risk opt-in election  
(enter "1" for Yes; leave blank for No) .....

|       |      |
|-------|------|
|       | RCOA |
| 1=Yes | NC99 |

31.b.

#### Qualifying Criteria and Other Information for CBLR Institutions\*

| Dollar Amounts in Thousands   | (Column A) |        | (Column B) |            |
|---|------------|--------|------------|------------|
|   | RCOA       | Amount | RCOA       | Percentage |
| 32. Total assets (Schedule RC, item 12); (must be less than \$10 billion) .....   | 2170       |        |            |            |
| 33. Trading assets and trading liabilities (Schedule RC, sum of items 5 and 15).<br>Report as a dollar amount in column A and as a percentage<br>of total assets (5% limit) in column B ..... | KX77       |        | KX78       |            |
| 34. Off-balance sheet exposures:<br>a. Unused portion of conditionally cancellable commitments .....  | KX79       |        |            |            |
| b. Securities lent and borrowed (Schedule RC-L, sum of items 6.a<br>and 6.b) .....  | KX80       |        |            |            |
| c. Other off-balance sheet exposures .....  | KX81       |        |            |            |
| d. Total off-balance sheet exposures (sum of items 34.a through<br>34.c). Report as a dollar amount in column A and as a percentage of<br>total assets (25% limit) in column B .....          | KX82       |        | KX83       |            |

32.

33.

34.a.

34.b.

34.c.

34.d.

| Dollar Amounts in Thousands  | RCOA | Amount |
|--|------|--------|
| 35. Unconditionally cancellable commitments .....  | S540 |        |
| 36. Investments in the tier 2 capital of unconsolidated financial institutions.....  | LB61 |        |
| 37. Allocated transfer risk reserve.....   | 3128 |        |
| 38. Amount of allowances for credit losses on purchased credit-deteriorated assets:<br>a. Loans and leases held for investment ..... | JJ30 |        |
| b. Held-to-maturity debt securities .....  | JJ31 |        |
| c. Other financial assets measured at amortized cost .....   | JJ32 |        |

35.

36.

37.

38.a.

38.b.

38.c.

\* Report each ratio as a percentage, rounded to four decimal places, e.g., 12.3456.

## Schedule RC-R—Continued

### Part I—Continued

If your institution entered “0” for No in item 31.a, complete items 39 through 54, as applicable, and Part II of Schedule RC-R. If your institution entered “1” for Yes in item 31.a, do not complete items 39 through 54 or Part II of Schedule RC-R.

|   | Dollar Amounts in Thousands | RCOA | Amount     |     |
|---|-----------------------------|------|------------|-----|
| <b>Tier 2 Capital<sup>1</sup></b>   |                             |      |            |     |
| 39. Tier 2 capital instruments plus related surplus .....   |                             | P866 |            | 39. |
| 40. Non-qualifying capital instruments subject to phase-out from tier 2 capital.....  |                             | P867 |            | 40. |
| 41. Total capital minority interest that is not included in tier 1 capital .....  |                             | P868 |            | 41. |
| 42. Adjusted allowances for credit losses (AACL) includable in tier 2 capital <sup>2</sup> .....  |                             | 5310 |            | 42. |
| 43. Not applicable  |                             |      |            |     |
| 44. Tier 2 capital before deductions (sum of items 39 through 42).....  |                             | P870 |            | 44. |
| 45. LESS: Tier 2 capital deductions .....   |                             | P872 |            | 45. |
| 46. Tier 2 capital (greater of item 44 minus item 45, or zero).....   |                             | 5311 |            | 46. |
| <b>Total Capital</b>  |                             |      |            |     |
| 47. Total capital (sum of items 26 and 46).....   |                             | 3792 |            | 47. |
| <b>Total Risk-Weighted Assets</b>   |                             |      |            |     |
| 48. Total risk-weighted assets (from Schedule RC-R, Part II, item 31).....  |                             | A223 |            | 48. |
| <b>Risk-Based Capital Ratios*</b>   |                             | RCOA | Percentage |     |
| 49. Common equity tier 1 capital ratio (item 19 divided by item 48).....  |                             | P793 |            | 49. |
| 50. Tier 1 capital ratio (item 26 divided by item 48) .....   |                             | 7206 |            | 50. |
| 51. Total capital ratio (item 47 divided by item 48) .....  |                             | 7205 |            | 51. |
| <b>Capital Buffer*</b>  |                             |      |            |     |
| 52. Institution-specific capital conservation buffer necessary to avoid limitations on distributions and discretionary bonus payments ..... |                             | H311 |            | 52. |
|   | Dollar Amounts in Thousands | RCOA | Amount     |     |
| 53. Eligible retained income <sup>3</sup> .....   |                             | H313 |            | 53. |
| 54. Distributions and discretionary bonus payments during the quarter <sup>4</sup> .....  |                             | H314 |            | 54. |

\* Report each ratio and buffer as a percentage, rounded to four decimal places, e.g., 12.3456.

- An institution that has a CBLR framework election in effect as of the quarter-end report date is neither required to calculate tier 2 capital nor make any deductions that would have been taken from tier 2 capital as of the report date.
- Institutions that have elected to apply the 3-year or the 5-year 2020 CECL transition provision should subtract the applicable portion of the AACL transitional amount or the modified AACL transitional amount, respectively, from the AACL, as defined in the regulatory capital rule, before determining the amount of AACL includable in tier 2 capital. See instructions for further detail on the CECL transition provisions.
- Institutions must complete item 53 only if the amount reported in item 52 above is less than or equal to 2.5000 percent.
- Institutions must complete item 54 only if the amount reported in Schedule RC-R, Part I, item 52, in the Call Report for the previous calendar quarter-end report date was less than or equal to 2.5000 percent.

## Schedule RC-R—Continued

### Part II. Risk-Weighted Assets

Institutions that entered "1" for Yes in Schedule RC-R, Part I, item 31.a, do not have to complete Schedule RC-R, Part II.

Institutions are required to assign a 100 percent risk weight to all assets not specifically assigned a risk weight under Subpart D of the federal banking agencies' regulatory capital rules<sup>1</sup> and not deducted from tier 1 or tier 2 capital. *Items 1 through 25 (column A through column U, as applicable) are to be completed semiannually in the June and December reports only.*

|  | (Column A)<br>Totals From<br>Schedule<br>RC | (Column B)<br>Adjustments<br>to Totals<br>Reported in<br>Column A | (Column C)                         | (Column D) | (Column E) | (Column F) | (Column G) | (Column H) | (Column I) | (Column J) |
|--|---|---|------------------------------------|------------|------------|------------|------------|------------|------------|------------|
|  |   |   | Allocation by Risk-Weight Category |            |            |            |            |            |            |            |
|  |   |   | 0%                                 | 2%         | 4%         | 10%        | 20%        | 50%        | 100%       | 150%       |
| Dollar Amounts in Thousands  | Amount                                      | Amount  | Amount                             | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     |
| <b>Balance Sheet Asset Categories<sup>2</sup></b>  |   |   |                                    |            |            |            |            |            |            |            |
| 1. Cash and balances due from depository institutions.....   | RCON D957                                   | RCON S396   | RCON D958                          |            |            |            |            |            |            |            |
| 2. Securities:   |   |   |                                    |            |            |            |            |            |            |            |
| a. Held-to-maturity securities <sup>3</sup> .....  | RCON D961                                   | RCON S399   | RCON D962                          | RCON HJ74  | RCON HJ75  |            |            |            |            |            |
| b. Available-for-sale debt securities and equity securities with readily determinable fair values not held for trading ..... | RCON JA21                                   | RCON S402   | RCON D967                          | RCON HJ76  | RCON HJ77  |            |            |            |            |            |
| 3. Federal funds sold and securities purchased under agreements to resell:   |   |   |                                    |            |            |            |            |            |            |            |
| a. Federal funds sold.....   | RCON D971                                   |   | RCON D972                          |            |            |            |            |            |            |            |
| b. Securities purchased under agreements to resell .....   | RCON H171                                   | RCON H172   |                                    |            |            |            |            |            |            |            |
| 4. Loans and leases held for sale:   |   |   |                                    |            |            |            |            |            |            |            |
| a. Residential mortgage exposures .....  | RCON S413                                   | RCON S414   | RCON H173                          |            |            |            |            |            |            |            |
| b. High volatility commercial real estate exposures.....   | RCON S419                                   | RCON S420   | RCON H174                          |            |            |            |            |            |            |            |

1. For national banks and federal savings associations, 12 CFR Part 3; for state member banks, 12 CFR Part 217; and for state nonmember banks and state savings associations 12 CFR Part 324.

2. All securitization exposures held as on-balance sheet assets of the reporting institution are to be excluded from items 1 through 8 and are to be reported instead in item 9.

3. Institutions should report held-to-maturity securities net of allowances for credit losses in item 2.a, column A. Institutions should report as a negative number in item 2.a, column B, those allowances for credit losses eligible for inclusion in tier 2 capital, which excludes allowances for credit losses on purchased credit-deteriorated assets.

1.  
2.a.  
2.b.  
3.a.  
3.b.  
4.a.  
4.b.

## Schedule RC-R—Continued

### Part II—Continued

| Dollar Amounts in Thousands  | (Column K)                         | (Column L) | (Column M) | (Column N) | (Column O) | (Column P) | (Column Q) | (Column R)  | (Column S)                 |
|--|------------------------------------|------------|------------|------------|------------|------------|------------|---|----------------------------|
|  | Allocation by Risk-Weight Category |            |            |            |            |            |            | Application of Other Risk-Weighting Approaches <sup>1</sup> |                            |
|  | 250%                               | 300%       | 400%       | 600%       | 625%       | 937.5%     | 1250%      | Exposure Amount   | Risk-Weighted Asset Amount |
|  | Amount                             | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     | Amount  | Amount                     |
| <b>Balance Sheet Asset Categories (continued)</b>  |                                    |            |            |            |            |            |            |   |                            |
| 1. Cash and balances due from depository institutions.....   |                                    |            |            |            |            |            |            |   |                            |
| 2. Securities:   |                                    |            |            |            |            |            |            |   |                            |
| a. Held-to-maturity securities.....  |                                    |            |            |            |            |            |            |   |                            |
| b. Available-for-sale debt securities and equity securities with readily determinable fair values not held for trading ..... |                                    |            |            |            |            |            |            |   |                            |
| 3. Federal funds sold and securities purchased under agreements to resell:   |                                    |            |            |            |            |            |            |   |                            |
| a. Federal funds sold.....   |                                    |            |            |            |            |            |            |   |                            |
| b. Securities purchased under agreements to resell .....   |                                    |            |            |            |            |            |            |   |                            |
| 4. Loans and leases held for sale:   |                                    |            |            |            |            |            |            |   |                            |
| a. Residential mortgage exposures .....  |                                    |            |            |            |            |            |            |   |                            |
| b. High volatility commercial real estate exposures.....   |                                    |            |            |            |            |            |            |   |                            |

1. Includes, for example, investments in mutual funds/investment funds, exposures collateralized by securitization exposures or mutual funds, separate account bank-owned life insurance, and default fund contributions to central counterparties.

## Schedule RC-R—Continued

### Part II—Continued

| Dollar Amounts in Thousands   | (Column A)<br>Totals From<br>Schedule<br>RC | (Column B)<br>Adjustments<br>to Totals<br>Reported in<br>Column A | (Column C)                         | (Column D) | (Column E) | (Column F) | (Column G) | (Column H) | (Column I) | (Column J) |
|---|---|---|------------------------------------|------------|------------|------------|------------|------------|------------|------------|
|   |   |   | Allocation by Risk-Weight Category |            |            |            |            |            |            |            |
|   |   |   | 0%                                 | 2%         | 4%         | 10%        | 20%        | 50%        | 100%       | 150%       |
| Amount  | Amount                                      | Amount  | Amount                             | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     |
| 4. Loans and leases held for sale (continued):                            |   |   |                                    |            |            |            |            |            |            |            |
| c. Exposures past due 90 days or more or on nonaccrual <sup>1</sup> ..... | RCON S423                                   | RCON S424   | RCON S425                          | RCON HJ78  | RCON HJ79  |            | RCON S426  | RCON S427  | RCON S428  | RCON S429  |
| d. All other exposures.....   | RCON S431                                   | RCON S432   | RCON S433                          | RCON HJ80  | RCON HJ81  |            | RCON S434  | RCON S435  | RCON S436  | RCON S437  |
| 5. Loans and leases held for investment: <sup>2</sup>                     |   |   |                                    |            |            |            |            |            |            |            |
| a. Residential mortgage exposures.....                                    | RCON S439                                   | RCON S440   | RCON H178                          |            |            |            | RCON S441  | RCON S442  | RCON S443  |            |
| b. High volatility commercial real estate exposures.....                  | RCON S445                                   | RCON S446   | RCON H179                          |            |            |            |            |            |            |            |
| c. Exposures past due 90 days or more or on nonaccrual <sup>3</sup> ..... | RCON S449                                   | RCON S450   | RCON S451                          | RCON HJ82  | RCON HJ83  |            | RCON H180  | RCON H181  | RCON H182  | RCON S447  |
| d. All other exposures ....   | RCON S457                                   | RCON S458   | RCON S459                          | RCON HJ84  | RCON HJ85  |            | RCON S452  | RCON S453  | RCON S454  | RCON S455  |
| 6. LESS: Allowance for credit losses on loans and leases .....            | RCON 3123                                   | RCON 3123   |                                    |            |            |            | RCON S460  | RCON S461  | RCON S462  | RCON S463  |

1. For loans and leases held for sale, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.

2. Institutions should report as a positive number in column B of items 5.a through 5.d, as appropriate, any allowances for credit losses on purchased credit-deteriorated assets reported in column A of items 5.a through 5.d, as appropriate.

3. For loans and leases held for investment, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.

4.c.

4.d.

5.a.

5.b.

5.c.

5.d.

6.

## Schedule RC-R—Continued

### Part II—Continued

| Dollar Amounts in Thousands   | (Column K)                         | (Column L) | (Column M) | (Column N) | (Column O) | (Column P) | (Column Q) | (Column R)  | (Column S)                 |
|---|------------------------------------|------------|------------|------------|------------|------------|------------|---|----------------------------|
|   | Allocation by Risk-Weight Category |            |            |            |            |            |            | Application of Other Risk-Weighting Approaches <sup>1</sup> |                            |
|   | 250%                               | 300%       | 400%       | 600%       | 625%       | 937.5%     | 1250%      | Exposure Amount   | Risk-Weighted Asset Amount |
|   | Amount                             | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     | Amount  | Amount                     |
| 4. Loans and leases held for sale (continued):                            |                                    |            |            |            |            |            |            |   |                            |
| c. Exposures past due 90 days or more or on nonaccrual <sup>2</sup> ..... |                                    |            |            |            |            |            |            | RCON H277   | RCON H278                  |
| d. All other exposures.....   |                                    |            |            |            |            |            |            | RCON H279   | RCON H280                  |
| 5. Loans and leases held for investment:                                  |                                    |            |            |            |            |            |            |   |                            |
| a. Residential mortgage exposures.....                                    |                                    |            |            |            |            |            |            | RCON H281   | RCON H282                  |
| b. High volatility commercial real estate exposures.....                  |                                    |            |            |            |            |            |            |   |                            |
| c. Exposures past due 90 days or more or on nonaccrual <sup>3</sup> ..... |                                    |            |            |            |            |            |            | RCON H283   | RCON H284                  |
| d. All other exposures .....  |                                    |            |            |            |            |            |            |   |                            |
| 6. LESS: Allowance for credit losses on loans and leases .....            |                                    |            |            |            |            |            |            | RCON H285   | RCON H286                  |
|   |                                    |            |            |            |            |            |            | RCON H287   | RCON H288                  |
|   |                                    |            |            |            |            |            |            |   |                            |

1. Includes, for example, investments in mutual funds/investment funds, exposures collateralized by securitization exposures or mutual funds, separate account bank-owned life insurance, and default fund contributions to central counterparties.

2. For loans and leases held for sale, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.

3. For loans and leases held for investment, exclude residential mortgage exposures, high volatility commercial real estate exposures, or sovereign exposures that are past due 90 days or more or on nonaccrual.

## Schedule RC-R—Continued

### Part II—Continued

| Dollar Amounts in Thousands   | (Column A)<br>Totals From<br>Schedule<br>RC | (Column B)<br>Adjustments<br>to Totals<br>Reported in<br>Column A | (Column C)                         | (Column D) | (Column E) | (Column F) | (Column G) | (Column H) | (Column I) | (Column J) |
|---|---|---|------------------------------------|------------|------------|------------|------------|------------|------------|------------|
|   |   |   | Allocation by Risk-Weight Category |            |            |            |            |            |            |            |
|   |   |   | 0%                                 | 2%         | 4%         | 10%        | 20%        | 50%        | 100%       | 150%       |
| Amount  | Amount                                      | Amount  | Amount                             | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     |
| RCON D976   | RCON S466                                   | RCON D977   | RCON HJ86                          | RCON HJ87  |            | RCON D978  | RCON D979  | RCON D980  | RCON S467  | 7.         |
| 7. Trading assets .....   |   |   |                                    |            |            |            |            |            |            |            |
| RCON D981   | RCON S469                                   | RCON D982   | RCON HJ88                          | RCON HJ89  |            | RCON D983  | RCON D984  | RCON D985  | RCON H185  | 8.         |
| 8. All other assets <sup>1, 2, 3</sup> .....                        |   |   |                                    |            |            |            |            |            |            |            |
| a. Separate account<br>bank-owned life<br>insurance .....           |   |   |                                    |            |            |            |            |            |            | 8.a.       |
| b. Default fund<br>contributions to central<br>counterparties ..... |   |   |                                    |            |            |            |            |            |            | 8.b.       |

1. Includes premises and fixed assets; other real estate owned; investments in unconsolidated subsidiaries and associated companies; direct and indirect investments in real estate ventures; intangible assets; and other assets.

2. Institutions that have elected to apply the 3-year or the 5-year 2020 CECL transition provision should report as a positive number in item 8, column B, the applicable portion of the DTA transitional amount as determined in accordance with the 3-year or the 5-year 2020 CECL transition rule, respectively.

3. Institutions that have reported any assets net of allowances for credit losses in item 8, column A, should report as a negative number in item 8, column B, those allowances for credit losses eligible for inclusion in tier 2 capital, which excludes allowances for credit losses on purchased credit-deteriorated assets.

## Schedule RC-R—Continued

### Part II—Continued

| Dollar Amounts in Thousands |           | (Column K)                         | (Column L) | (Column M) | (Column N) | (Column O) | (Column P) | (Column Q) | (Column R)  | (Column S)                 |
|-----------------------------|-----------|------------------------------------|------------|------------|------------|------------|------------|------------|---|----------------------------|
|                             |           | Allocation by Risk-Weight Category |            |            |            |            |            |            | Application of Other Risk-Weighting Approaches <sup>1</sup> |                            |
|                             |           | 250%                               | 300%       | 400%       | 600%       | 625%       | 937.5%     | 1250%      | Exposure Amount   | Risk-Weighted Asset Amount |
| Amount                      | Amount    | Amount                             | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     | Amount  | Amount                     |
|                             | RCON H186 | RCON H290                          | RCON H187  |            |            |            |            |            | RCON H291   | RCON H292                  |
|                             |           |                                    |            |            |            |            |            |            |   |                            |
| RCON H293                   | RCON H188 | RCON S470                          | RCON S471  |            |            |            |            |            | RCON H294   | RCON H295                  |
|                             |           |                                    |            |            |            |            |            |            |   |                            |
|                             |           |                                    |            |            |            |            |            |            | RCON H296   | RCON H297                  |
|                             |           |                                    |            |            |            |            |            |            |   |                            |
|                             |           |                                    |            |            |            |            |            |            | RCON H298   | RCON H299                  |
|                             |           |                                    |            |            |            |            |            |            |   |                            |

1. Includes, for example, investments in mutual funds/investment funds, exposures collateralized by securitization exposures or mutual funds, separate account bank-owned life insurance, and default fund contributions to central counterparties.

2. Includes premises and fixed assets; other real estate owned; investments in unconsolidated subsidiaries and associated companies; direct and indirect investments in real estate ventures; intangible assets; and other assets.

7.  
8.  
8.a.  
8.b.

## Schedule RC-R—Continued

### Part II—Continued

| Dollar Amounts in Thousands                                 | (Column A)<br>Totals | (Column B)<br>Adjustments<br>to Totals<br>Reported in<br>Column A | (Column Q)  | (Column T)  | (Column U) |  |
|---|----------------------|---|---|---|------------|--|
|   |                      |   | Allocation by<br>Risk-Weight<br>Category<br>(Exposure Amount) | Total Risk-Weighted Asset<br>Amount by Calculation<br>Methodology |            |  |
|   |                      |   | 1250%   | SSFA <sup>1</sup>   | Gross-Up   |  |
|   | Amount               | Amount  | Amount  | Amount  | Amount     |  |
| <b>Securitization Exposures: On- and Off-Balance Sheet</b>  |                      |   |   |   |            |  |
| 9. On-balance sheet securitization exposures:               |                      |   |   |   |            |  |
| a. Held-to-maturity securities <sup>2</sup> .....           | RCON S475            | RCON S476   | RCON S477   | RCON S478   | RCON S479  |  |
| b. Available-for-sale securities .....                      | RCON S480            | RCON S481   | RCON S482   | RCON S483   | RCON S484  |  |
| c. Trading assets .....                                     | RCON S485            | RCON S486   | RCON S487   | RCON S488   | RCON S489  |  |
| d. All other on-balance sheet securitization exposures..... | RCON S490            | RCON S491   | RCON S492   | RCON S493   | RCON S494  |  |
| 10. Off-balance sheet securitization exposures .....        | RCON S495            | RCON S496   | RCON S497   | RCON S498   | RCON S499  |  |
|   |                      |   |   |   |            |  |

1. Simplified Supervisory Formula Approach.

2. Institutions should report held-to-maturity securities net of allowances for credit losses in item 9.a, column A. Institutions should report as a negative number in item 9.a, column B, those allowances for credit losses eligible for inclusion in tier 2 capital, which excludes allowances for credit losses on purchased credit-deteriorated assets.

9.a.

9.b.

9.c.

9.d.

10.

## Schedule RC-R—Continued

### Part II—Continued

| Dollar Amounts in Thousands                          | (Column A)<br>Totals From<br>Schedule<br>RC | (Column B)<br>Adjustments<br>to Totals<br>Reported in<br>Column A | (Column C)                         | (Column D) | (Column E) | (Column F) | (Column G) | (Column H) | (Column I)   | (Column J) |
|--|---|---|------------------------------------|------------|------------|------------|------------|------------|--|------------|
|  |   |   | Allocation by Risk-Weight Category |            |            |            |            |            |  |            |
|  |   |   | 0%                                 | 2%         | 4%         | 10%        | 20%        | 50%        | 100%   | 150%       |
| 11. Total balance sheet<br>assets <sup>1</sup> ..... | Amount                                      | Amount  | Amount                             | Amount     | Amount     | Amount     | Amount     | Amount     | Amount   | Amount     |
|  | RCON 2170                                   | RCON S500   | RCON D987                          | RCON HJ90  | RCON HJ91  |            |            | RCON D988  | RCON D989  | RCON D990  |
|  |   |   |                                    |            |            |            |            |            |  | RCON S503  |
| Dollar Amounts in Thousands                          | (Column K)                                  | (Column L)  | (Column M)                         | (Column N) | (Column O) | (Column P) | (Column Q) | (Column R) | Application of<br>Other Risk-<br>Weighting<br>Approaches |            |
|  | 250%  | 300%  | 400%                               | 600%       | 625%       | 937.5%     | 1250%      |            |  |            |
|  | Amount                                      | Amount  | Amount                             | Amount     | Amount     | Amount     | Amount     |            |  |            |
| 11. Total balance sheet<br>assets <sup>1</sup> ..... | RCON S504                                   | RCON S505   | RCON S506                          | RCON S507  |            |            | RCON S510  | RCON H300  | Exposure<br>Amount                                       |            |
|  |   |   |                                    |            |            |            |            |            |  |            |

1. For each of columns A through R of item 11, report the sum of items 1 through 9. For item 11, the sum of columns B through R must equal column A. Item 11, column A, must equal Schedule RC, item 12.

11.

11.

## Schedule RC-R—Continued

### Part II—Continued

| Dollar Amounts in Thousands   | (Column A)<br>Face, Notional,<br>or Other<br>Amount | CCF <sup>1</sup> | (Column B)<br>Credit<br>Equivalent<br>Amount <sup>2</sup> | (Column C)                         | (Column D) | (Column E) | (Column F) | (Column G) | (Column H) | (Column I) | (Column J) |
|---|---|------------------|---|------------------------------------|------------|------------|------------|------------|------------|------------|------------|
|   |   |                  |   | Allocation by Risk-Weight Category |            |            |            |            |            |            |            |
|   |   |                  |   | 0%                                 | 2%         | 4%         | 10%        | 20%        | 50%        | 100%       | 150%       |
| Amount  | Amount  | Amount           | Amount  | Amount                             | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     |
| <b>Derivatives, Off-Balance Sheet Items, and Other Items Subject to Risk Weighting (Excluding Securitization Exposures)<sup>3</sup></b> |   |                  |   |                                    |            |            |            |            |            |            |            |
| 12. Financial standby letters of credit .....   | RCON D991   | RCON D992        | RCON D993   | RCON HJ92                          | RCON HJ93  |            |            |            |            |            |            |
|   | 1.0   |                  |   |                                    |            | RCON D994  | RCON D995  | RCON D996  | RCON S511  |            |            |
| 13. Performance standby letters of credit and transaction-related contingent items .....  | RCON D997   | RCON D998        | RCON D999   |                                    |            |            |            |            |            |            |            |
|   | 0.5   |                  |   |                                    |            | RCON G603  | RCON G604  | RCON G605  | RCON S512  |            |            |
| 14. Commercial and similar letters of credit with an original maturity of one year or less .....  | RCON G606   | RCON G607        | RCON G608   | RCON HJ94                          | RCON HJ95  |            |            |            |            |            |            |
|   | 0.2   |                  |   |                                    |            | RCON G609  | RCON G610  | RCON G611  | RCON S513  |            |            |
| 15. Retained recourse on small business obligations sold with recourse .....  | RCON G612   | RCON G613        | RCON G614   |                                    |            |            |            |            |            |            |            |
|   | 1.0   |                  |   |                                    |            | RCON G615  | RCON G616  | RCON G617  | RCON S514  |            |            |

12.

13.

14.

15.

1. Credit conversion factor.

2. Column A multiplied by credit conversion factor. For each of items 12 through 21, the sum of columns C through J plus column R must equal column B.

3. All derivatives and off-balance sheet items that are securitization exposures are to be excluded from items 12 through 21 and are to be reported instead in item 10.

## Schedule RC-R—Continued

### Part II—Continued

| Dollar Amounts in Thousands  | (Column A)<br>Face, Notional,<br>or Other<br>Amount | CCF <sup>1</sup> | (Column B)<br>Credit<br>Equivalent<br>Amount <sup>2</sup> | (Column C)                         | (Column D) | (Column E) | (Column F) | (Column G) | (Column H) | (Column I) | (Column J) |
|--|---|------------------|---|------------------------------------|------------|------------|------------|------------|------------|------------|------------|
|  |   |                  |   | Allocation by Risk-Weight Category |            |            |            |            |            |            |            |
|  |   |                  |   | 0%                                 | 2%         | 4%         | 10%        | 20%        | 50%        | 100%       | 150%       |
| Amount   | Amount  | Amount           | Amount  | Amount                             | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     |
| 16. Repo-style transactions <sup>3</sup> .....   | RCON S515   |                  | RCON S516   | RCON S517                          | RCON S518  | RCON S519  |            | RCON S520  | RCON S521  | RCON S522  | RCON S523  |
|  |   | 1.0              |   |                                    |            |            |            |            |            |            |            |
| 17. All other off-balance sheet liabilities .....  | RCON G618   |                  | RCON G619   | RCON G620                          |            |            |            | RCON G621  | RCON G622  | RCON G623  | RCON S524  |
|  |   | 1.0              |   |                                    |            |            |            |            |            |            |            |
| 18. Unused commitments (exclude unused commitments to asset-backed commercial paper conduits): |   |                  |   |                                    |            |            |            |            |            |            |            |
| a. Original maturity of one year or less ..  | RCON S525   |                  | RCON S526   | RCON S527                          | RCON HJ96  | RCON HJ97  |            | RCON S528  | RCON S529  | RCON S530  | RCON S531  |
|  |   | 0.2              |   |                                    |            |            |            |            |            |            |            |
| b. Original maturity exceeding one year .....  | RCON G624   |                  | RCON G625   | RCON G626                          | RCON HJ98  | RCON HJ99  |            | RCON G627  | RCON G628  | RCON G629  | RCON S539  |
|  |   | 0.5              |   |                                    |            |            |            |            |            |            |            |
| 19. Unconditionally cancelable commitments .....   | RCON S540   |                  | RCON S541   |                                    |            |            |            |            |            |            |            |
|  |   | 0.0              |   |                                    |            |            |            |            |            |            |            |
| 20. Over-the-counter derivatives .....   |   |                  | RCON S542   | RCON S543                          | RCON HK00  | RCON HK01  | RCON S544  | RCON S545  | RCON S546  | RCON S547  | RCON S548  |
|  |   |                  |   |                                    |            |            |            |            |            |            |            |
| 21. Centrally cleared derivatives .....  |   |                  | RCON S549   | RCON S550                          | RCON S551  | RCON S552  |            | RCON S554  | RCON S555  | RCON S556  | RCON S557  |
|  |   |                  |   |                                    |            |            |            |            |            |            |            |
| 22. Unsettled transactions (failed trades) <sup>4</sup> .....                                  | RCON H191   |                  |   | RCON H193                          |            |            |            | RCON H194  | RCON H195  | RCON H196  | RCON H197  |
|  |   |                  |   |                                    |            |            |            |            |            |            |            |

1. Credit conversion factor.

2. For items 16 through 19, column A multiplied by credit conversion factor.

3. Includes securities purchased under agreements to resell (reverse repos), securities sold under agreements to repurchase (repos), securities borrowed, and securities lent.

4. For item 22, the sum of columns C through Q must equal column A.

16.

17.

18.a.

18.b.

19.

20.

21.

22.

## Schedule RC-R—Continued

### Part II—Continued

| Dollar Amounts in Thousands  | (Column O)                         | (Column P) | (Column Q) | (Column R)  | (Column S)                 |
|--|------------------------------------|------------|------------|---|----------------------------|
|  | Allocation by Risk-Weight Category |            |            | Application of Other Risk-Weighting Approaches <sup>1</sup> |                            |
|  | 625%                               | 937.5%     | 1250%      | Credit Equivalent Amount                                    | Risk-Weighted Asset Amount |
|  | Amount                             | Amount     | Amount     | Amount  | Amount                     |
| 16. Repo-style transactions <sup>2</sup> .....   |                                    |            |            | RCON H301   | RCON H302                  |
| 17. All other off-balance sheet liabilities .....  |                                    |            |            |   |                            |
| 18. Unused commitments (exclude unused commitments to asset-backed commercial paper conduits): |                                    |            |            |   |                            |
| a. Original maturity of one year or less .....   |                                    |            |            | RCON H303   | RCON H304                  |
| b. Original maturity exceeding one year .....  |                                    |            |            |   |                            |
| 19. Unconditionally cancelable commitments.....  |                                    |            |            | RCON H307   | RCON H308                  |
| 20. Over-the-counter derivatives .....   |                                    |            |            |   |                            |
| 21. Centrally cleared derivatives .....  |                                    |            |            | RCON H309   | RCON H310                  |
| 22. Unsettled transactions (failed trades) <sup>3</sup> .....                                  | RCON H198                          | RCON H199  | RCON H200  |   |                            |
|  |                                    |            |            |   |                            |

1. Includes, for example, exposures collateralized by securitization exposures or mutual funds.

2. Includes securities purchased under agreements to resell (reverse repos), securities sold under agreements to repurchase (repos), securities borrowed, and securities lent.

3. For item 22, the sum of columns C through Q must equal column A.

## Schedule RC-R—Continued

### Part II—Continued

| Dollar Amounts in Thousands   | (Column C)                         | (Column D) | (Column E) | (Column F) | (Column G) | (Column H) | (Column I) | (Column J) |
|---|------------------------------------|------------|------------|------------|------------|------------|------------|------------|
|   | Allocation by Risk-Weight Category |            |            |            |            |            |            |            |
|   | 0%                                 | 2%         | 4%         | 10%        | 20%        | 50%        | 100%       | 150%       |
|   | Amount                             | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     | Amount     |
| 23. Total assets, derivatives, off-balance sheet items, and other items subject to risk weighting by risk-weight category (for each of columns C through P, sum of items 11 through 22; for column Q, sum of items 10 through 22) ..... |                                    |            |            |            |            |            |            |            |
| 24. Risk-weight factor .....  | RCON G630                          | RCON S558  | RCON S559  | RCON S560  | RCON G631  | RCON G632  | RCON G633  | RCON S561  |
|   |                                    |            |            |            |            |            |            |            |
| 25. Risk-weighted assets by risk-weight category (for each column, item 23 multiplied by item 24) .....   | X 0%                               | X 2%       | X 4%       | X 10%      | X 20%      | X 50%      | X 100%     | X 150%     |
|   |                                    |            |            |            |            |            |            |            |
|   | RCON G634                          | RCON S569  | RCON S570  | RCON S571  | RCON G635  | RCON G636  | RCON G637  | RCON S572  |
|   |                                    |            |            |            |            |            |            |            |

23.  
24.

25.

## Schedule RC-R—Continued

### Part II—Continued

|   | (Column K) | (Column L) | (Column M) | (Column N) | (Column O) | (Column P) | (Column Q) |
|---|------------|------------|------------|------------|------------|------------|------------|
| Allocation by Risk-Weight Category  |            |            |            |            |            |            |            |
|   | 250%       | 300%       | 400%       | 600%       | 625%       | 937.5%     | 1250%      |
| Dollar Amounts in Thousands   | Amount     |
| 23. Total assets, derivatives, off-balance sheet items, and other items subject to risk weighting by risk-weight category (for each of columns C through P, sum of items 11 through 22; for column Q, sum of items 10 through 22) ..... |            |            |            |            |            |            |            |
|   | RCON S562  | RCON S563  | RCON S564  | RCON S565  | RCON S566  | RCON S567  | RCON S568  |
|   |            |            |            |            |            |            |            |
| 24. Risk-weight factor .....  | X 250%     | X 300%     | X 400%     | X 600%     | X 625%     | X 937.5%   | X 1250%    |
| 25. Risk-weighted assets by risk-weight category (for each column, item 23 multiplied by item 24) .....   |            |            |            |            |            |            |            |
|   | RCON S573  | RCON S574  | RCON S575  | RCON S576  | RCON S577  | RCON S578  | RCON S579  |
|   |            |            |            |            |            |            |            |

Items 26 through 31 are to be completed quarterly.

|   | Dollar Amounts in Thousands | Totals |
|---|-----------------------------|--------|
|   | RCON                        | Amount |
| 26. Risk-weighted assets base for purposes of calculating the adjusted allowances for credit losses (AACL) 1.25 percent threshold ..... | S580                        |        |
| 27. Standardized market-risk weighted assets (applicable only to banks that are covered by the market risk capital rules) .....         | S581                        |        |
| 28. Risk-weighted assets before deductions for excess AACL <sup>1</sup> and allocated transfer risk reserve <sup>2</sup> .....          | B704                        |        |
| 29. LESS: Excess AACL <sup>1</sup> .....  | A222                        |        |
| 30. LESS: Allocated transfer risk reserve .....   | 3128                        |        |
| 31. Total risk-weighted assets (item 28 minus items 29 and 30) .....  | G641                        |        |

1. Institutions that have elected to apply the 3-year or the 5-year 2020 CECL transition provision should subtract the applicable portion of the AACL transitional amount or the modified AACL transitional amount, respectively, from the AACL, as defined in the regulatory capital rule, before determining the amount of excess AACL.

2. Sum of items 2.b through 20, column S; items 9.a, 9.b, 9.c, 9.d, and 10, columns T and U; item 25, columns C through Q; and item 27 (if applicable).

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## Schedule RC-R—Continued

### Part II—Continued

#### Memoranda

|   | Dollar Amounts in Thousands    |        | Dollar Amounts in Thousands                       |        | RCON                          | Amount |
|---|--------------------------------|--------|---|--------|-------------------------------|--------|
|   | RCON                           | Amount | RCON  | Amount | RCON                          | Amount |
| <i>Memorandum items 1, 2, and 3 are to be completed semiannually in the June and December reports only.</i> |                                |        |   |        |                               |        |
| 1. Current credit exposure across all derivative contracts covered by the regulatory capital rules .....    |                                |        |   |        | G642                          |        |
|   | With a remaining maturity of   |        |   |        |                               |        |
|   | (Column A)<br>One year or less |        | (Column B)<br>Over one year<br>through five years |        | (Column C)<br>Over five years |        |
|   | RCON                           | Amount | RCON  | Amount | RCON                          | Amount |
| 2. Notional principal amounts of over-the-counter derivative contracts:                                     |                                |        |   |        |                               |        |
| a. Interest rate .....  | S582                           |        | S583  |        | S584                          |        |
| b. Foreign exchange rate and gold .....   | S585                           |        | S586  |        | S587                          |        |
| c. Credit (investment grade reference asset) .....  | S588                           |        | S589  |        | S590                          |        |
| d. Credit (non-investment grade reference asset) .....  | S591                           |        | S592  |        | S593                          |        |
| e. Equity .....   | S594                           |        | S595  |        | S596                          |        |
| f. Precious metals (except gold) .....  | S597                           |        | S598  |        | S599                          |        |
| g. Other .....  | S600                           |        | S601  |        | S602                          |        |
| 3. Notional principal amounts of centrally cleared derivative contracts:                                    |                                |        |   |        |                               |        |
| a. Interest rate .....  | S603                           |        | S604  |        | S605                          |        |
| b. Foreign exchange rate and gold .....   | S606                           |        | S607  |        | S608                          |        |
| c. Credit (investment grade reference asset) .....  | S609                           |        | S610  |        | S611                          |        |
| d. Credit (non-investment grade reference asset) .....  | S612                           |        | S613  |        | S614                          |        |
| e. Equity .....   | S615                           |        | S616  |        | S617                          |        |
| f. Precious metals (except gold) .....  | S618                           |        | S619  |        | S620                          |        |
| g. Other .....  | S621                           |        | S622  |        | S623                          |        |
| 4. Amount of allowances for credit losses on purchased credit-deteriorated assets:                          | Dollar Amounts in Thousands    |        | RCON  | Amount |                               |        |
| a. Loans and leases held for investment .....   |                                |        | JJ30  |        |                               |        |
| b. Held-to-maturity debt securities .....   |                                |        | JJ31  |        |                               |        |
| c. Other financial assets measured at amortized cost .....  |                                |        | JJ32  |        |                               |        |

## Schedule RC-T—Fiduciary and Related Services

|  | RCON | Yes | No |    |
|--|------|-----|----|----|
| 1. Does the institution have fiduciary powers? (If "NO," do not complete Schedule RC-T.) .....   | A345 |     |    | 1. |
| 2. Does the institution exercise the fiduciary powers it has been granted? .....   | A346 |     |    | 2. |
| 3. Does the institution have any fiduciary or related activity (in the form of assets or accounts) to report in this schedule? (If "NO," do not complete the rest of Schedule RC-T.) ..... | B867 |     |    | 3. |

If the answer to item 3 is "YES," complete the applicable items of Schedule RC-T, as follows:

Institutions with total fiduciary assets (item 10, sum of columns A and B) greater than \$1 billion (as of the preceding December 31 report date) or with gross fiduciary and related services income greater than 10 percent of revenue (net interest income plus noninterest income) for the preceding calendar year must complete:

- Items 4 through 22 and Memorandum item 3 quarterly,
- Items 23 through 26 annually with the December report, and
- Memorandum items 1, 2, and 4 annually with the December report.

Institutions with total fiduciary assets (item 10, sum of columns A and B) greater than \$250 million but less than or equal to \$1 billion (as of the preceding December 31 report date) that do not meet the fiduciary income test for quarterly reporting must complete:

- Items 4 through 22 and Memorandum item 3 semiannually with the June and December reports,
- Items 23 through 26 annually with the December report, and
- Memorandum items 1, 2, and 4 annually with the December report.

Institutions with total fiduciary assets (item 10, sum of columns A and B) less than or equal to \$250 million (as of the preceding December 31) that do not meet the fiduciary income test for quarterly reporting must complete:

- Items 4 through 13 annually with the December report, and
- Memorandum items 1 through 3 annually with the December report.
- Institutions with total fiduciary assets greater than \$100 million but less than or equal to \$250 million (as of the preceding December 31 report date) that do not meet the fiduciary income test for quarterly reporting must also complete Memorandum item 4 annually with the December report.

|   | (Column A)<br>Managed<br>Assets | (Column B)<br>Non-Managed<br>Assets | (Column C)<br>Number of<br>Managed<br>Accounts | (Column D)<br>Number of<br>Non-Managed<br>Accounts |
|---|---------------------------------|-------------------------------------|--|--|
|   | Amount                          | Amount                              | Number   | Number   |
| Dollar Amounts in Thousands   |                                 |                                     |  |  |
| <b>Fiduciary and Related Assets</b>                                   | RCON B868                       | RCON B869                           | RCON B870                                      | RCON B871  |
| 4. Personal trust and agency accounts ..                              |                                 |                                     |  |  |
| 5. Employee benefit and retirement-related trust and agency accounts: |                                 |                                     |  |  |
| a. Employee benefit—defined contribution.....                         | RCON B872                       | RCON B873                           | RCON B874                                      | RCON B875  |
| b. Employee benefit—defined benefit .....                             | RCON B876                       | RCON B877                           | RCON B878                                      | RCON B879  |
| c. Other employee benefit and retirement-related accounts .....       | RCON B880                       | RCON B881                           | RCON B882                                      | RCON B883  |
|   | RCON B884                       | RCON B885                           | RCON C001                                      | RCON C002  |
| 6. Corporate trust and agency accounts..                              |                                 |                                     |  |  |
| 7. Investment management and investment advisory agency accounts..    | RCON B886                       | RCON J253                           | RCON B888                                      | RCON J254  |
| 8. Foundation and endowment trust and agency accounts .....           | RCON J255                       | RCON J256                           | RCON J257                                      | RCON J258  |
|   | RCON B890                       | RCON B891                           | RCON B892                                      | RCON B893  |
| 9. Other fiduciary accounts .....                                     | RCON B894                       | RCON B895                           | RCON B896                                      | RCON B897  |
| 10. Total fiduciary accounts<br>(sum of items 4 through 9) .....      |                                 |                                     |  |  |

## Schedule RC-T—Continued

|  | (Column A)<br>Managed<br>Assets | (Column B)<br>Non-Managed<br>Assets | (Column C)<br>Number of<br>Managed<br>Accounts | (Column D)<br>Number of<br>Non-Managed<br>Accounts |
|--|---------------------------------|-------------------------------------|--|--|
| Dollar Amounts in Thousands  | Amount                          | Amount                              | Number   | Number   |
| 11. Custody and safekeeping accounts...  |                                 | RCON B898                           |  | RCON B899  |
| 12. Not applicable   |                                 |                                     |  |  |
| 13. Individual Retirement Accounts, Health Savings Accounts, and other similar accounts (included in items 5.c and 11).. | RCON J259                       | RCON J260                           | RCON J261                                      | RCON J262  |
|  |                                 |                                     |  |  |

|  | Dollar Amounts in Thousands | RIAD | Amount |
|--|-----------------------------|------|--------|
| <b>Fiduciary and Related Services Income</b>   |                             |      |        |
| 14. Personal trust and agency accounts .....   |                             | B904 |        |
| 15. Employee benefit and retirement-related trust and agency accounts:   |                             | B905 |        |
| a. Employee benefit—defined contribution .....   |                             | B906 |        |
| b. Employee benefit—defined benefit .....  |                             | B907 |        |
| c. Other employee benefit and retirement-related accounts .....  |                             | A479 |        |
| 16. Corporate trust and agency accounts .....  |                             | J315 |        |
| 17. Investment management and investment advisory agency accounts .....  |                             | J316 |        |
| 18. Foundation and endowment trust and agency accounts .....   |                             | A480 |        |
| 19. Other fiduciary accounts .....   |                             | B909 |        |
| 20. Custody and safekeeping accounts .....   |                             | B910 |        |
| 21. Other fiduciary and related services income .....  |                             |      |        |
| 22. Total gross fiduciary and related services income (sum of items 14 through 21)<br>(must equal Schedule RI, item 5.a) ..... | 4070                        |      |        |
| 23. Less: Expenses .....   | C058                        |      |        |
| 24. Less: Net losses from fiduciary and related services .....   | A488                        |      |        |
| 25. Plus: Intracompany income credits for fiduciary and related services .....   | B911                        |      |        |
| 26. Net fiduciary and related services income .....  | A491                        |      |        |

| Memoranda  | (Column A)<br>Personal Trust and<br>Agency and Investment<br>Management Agency<br>Accounts |      | (Column B)<br>Employee Benefit<br>and Retirement-Related<br>Trust and Agency<br>Accounts |      | (Column C)<br>All Other Accounts |      |        |
|--|--|------|--|------|----------------------------------|------|--------|
|  | Dollar Amounts in Thousands  | RCON | Amount   | RCON | Amount                           | RCON | Amount |
| 1. Managed assets held in fiduciary accounts:                                |  |      |  |      |                                  |      |        |
| a. Noninterest-bearing deposits .....  | J263   |      | J264   |      | J265                             |      |        |
| b. Interest-bearing deposits .....   | J266   |      | J267   |      | J268                             |      |        |
| c. U.S. Treasury and U.S. Government<br>agency obligations .....             | J269   |      | J270   |      | J271                             |      |        |
| d. State, county, and municipal obligations .....                            | J272   |      | J273   |      | J274                             |      |        |
| e. Money market mutual funds .....   | J275   |      | J276   |      | J277                             |      |        |
| f. Equity mutual funds .....   | J278   |      | J279   |      | J280                             |      |        |
| g. Other mutual funds .....  | J281   |      | J282   |      | J283                             |      |        |
| h. Common trust funds and collective<br>investment funds .....               | J284   |      | J285   |      | J286                             |      |        |
| i. Other short-term obligations .....  | J287   |      | J288   |      | J289                             |      |        |
| j. Other notes and bonds .....   | J290   |      | J291   |      | J292                             |      |        |
| k. Investments in unregistered funds and<br>private equity investments ..... | J293   |      | J294   |      | J295                             |      |        |

## Schedule RC-T—Continued

### Memoranda—Continued

|  | (Column A)<br>Personal Trust and<br>Agency and Investment<br>Management Agency<br>Accounts |        | (Column B)<br>Employee Benefit<br>and Retirement-Related<br>Trust and Agency<br>Accounts |        | (Column C)<br>All Other Accounts |        |
|--|--|--------|--|--------|----------------------------------|--------|
|  | RCON   | Amount | RCON   | Amount | RCON                             | Amount |
| Dollar Amounts in Thousands  |  |        |  |        |                                  |        |
| 1. I. Other common and preferred stocks .....  | J296   |        | J297   |        | J298                             |        |
| m. Real estate mortgages .....   | J299   |        | J300   |        | J301                             |        |
| n. Real estate .....   | J302   |        | J303   |        | J304                             |        |
| o. Miscellaneous assets .....  | J305   |        | J306   |        | J307                             |        |
| p. Total managed assets held in fiduciary<br>accounts (for each column, sum of<br>Memorandum items 1.a through 1.o)..... | J308   |        | J309   |        | J310                             |        |

M.1. I.  
M.1.m.  
M.1.n.  
M.1.o.  
M.1.p.

|   | (Column A)<br>Managed Assets |        | (Column B)<br>Number of<br>Managed Accounts |        |
|---|------------------------------|--------|---|--------|
|   | RCON                         | Amount | RCON  | Number |
| 1. q. Investments of managed fiduciary accounts in advised or<br>sponsored mutual funds ..... | J311                         |        | J312  |        |

M.1.q.

|   | (Column A)<br>Number of<br>Issues |        | (Column B)<br>Principal Amount<br>Outstanding |           |
|---|-----------------------------------|--------|---|-----------|
|   | RCON                              | Number | Amount  |           |
| Dollar Amounts in Thousands   |                                   |        |   |           |
| 2. Corporate trust and agency accounts:                                     |                                   |        |   | RCON B928 |
| a. Corporate and municipal trusteeships .....                               | B927                              |        |   |           |
| (1) Issues reported in Memorandum item 2.a that are in default .....        | J313                              |        |   | RCON J314 |
| b. Transfer agent, registrar, paying agent, and other corporate agency..... | B929                              |        |   |           |

M.2.a.  
M.2.a.(1)  
M.2.b.

Memorandum items 3.a through 3.h are to be completed by banks with collective investment funds and common trust funds with a total market value of \$1 billion or more as of the preceding December 31 report date.

Memorandum item 3.h only is to be completed by banks with collective investment funds and common trust funds with a total market value of less than \$1 billion as of the preceding December 31 report date.

|  | (Column A)<br>Number of Funds |        | (Column B)<br>Market Value of<br>Fund Assets |        |
|--|-------------------------------|--------|--|--------|
|  | RCON                          | Number | RCON   | Amount |
| Dollar Amounts in Thousands  |                               |        |  |        |
| 3. Collective investment funds and common trust funds                                  |                               |        |  |        |
| a. Domestic equity.....  | B931                          |        | B932   |        |
| b. International/Global equity .....   | B933                          |        | B934   |        |
| c. Stock/Bond blend.....   | B935                          |        | B936   |        |
| d. Taxable bond.....   | B937                          |        | B938   |        |
| e. Municipal bond.....   | B939                          |        | B940   |        |
| f. Short-term investments/Money market .....   | B941                          |        | B942   |        |
| g. Specialty/Other .....   | B943                          |        | B944   |        |
| h. Total collective investment funds<br>(sum of Memorandum items 3.a through 3.g)..... | B945                          |        | B946   |        |

M.3.a.  
M.3.b.  
M.3.c.  
M.3.d.  
M.3.e.  
M.3. f.  
M.3.g.  
M.3.h.

## Schedule RC-T—Continued

### Memoranda—Continued

| Dollar Amounts in Thousands   | (Column A)<br>Gross Losses<br>Managed<br>Accounts |        | (Column B)<br>Gross Losses<br>Non-Managed<br>Accounts |        | (Column C)<br>Recoveries |        |
|---|---|--------|---|--------|--------------------------|--------|
|   | RIAD  | Amount | RIAD  | Amount | RIAD                     | Amount |
| 4. Fiduciary settlements, surcharges, and other losses:   |   |        |   |        |                          |        |
| a. Personal trust and agency accounts .....   | B947  |        | B948  |        | B949                     |        |
| b. Employee benefit and retirement-related trust and agency accounts .....  | B950  |        | B951  |        | B952                     |        |
| c. Investment management and investment advisory agency accounts .....  | B953  |        | B954  |        | B955                     |        |
| d. Other fiduciary accounts and related services .....  | B956  |        | B957  |        | B958                     |        |
| e. Total fiduciary settlements, surcharges, and other losses<br>(sum of Memorandum items 4.a through 4.d)<br>(sum of columns A and B minus column C must equal<br>Schedule RC-T, item 24) ..... | B959  |        | B960  |        | B961                     |        |

Person to whom questions about Schedule RC-T—Fiduciary and Related Services should be directed:

Name and Title (TEXT B962)

E-mail Address (TEXT B926)

Area Code / Phone Number / Extension (TEXT B963)

Area Code / FAX Number (TEXT B964)

## Schedule SU—Supplemental Information

All institutions must complete the indicator questions with either a "Yes" or a "No." For questions for which the response is "Yes," the corresponding items must be completed.

| Dollar Amounts in Thousands  |      |        |    |
|--|------|--------|----|
|  | RCON | Yes    | No |
| <b>Derivatives</b>   |      |        |    |
| 1. Does the institution have any derivative contracts? .....   | FT00 |        |    |
| a. Total gross notional amount of interest rate derivatives held for trading .....   |      | Amount |    |
| b. Total gross notional amount of all other derivatives held for trading .....   | A126 |        |    |
| c. Total gross notional amount of interest rate derivatives not held for trading .....   | FT01 |        |    |
| d. Total gross notional amount of all other derivatives not held for trading .....   | 8725 |        |    |
|  | FT02 |        |    |
|  |      |        |    |
| <b>1–4 Family Residential Mortgage Banking Activities</b>  |      |        |    |
| 2. For the two calendar quarters preceding the current calendar quarter, did the institution meet one or both of the following mortgage banking activity thresholds: (1) Sales of 1–4 family residential mortgage loans during the calendar quarter exceeded \$10 million, or (2) 1–4 family residential mortgage loans held for sale or trading as of calendar quarter-end exceeded \$10 million? ..... | FT03 |        |    |
| a. Principal amount of 1–4 family residential mortgage loans sold during the quarter .....   |      | Amount |    |
| b. Quarter-end amount of 1–4 family residential mortgage loans held for sale or trading.....   | FT04 |        |    |
|  | FT05 |        |    |
|  |      |        |    |
| <b>Assets and Liabilities Measured at Fair Value on a Recurring Basis</b>  |      |        |    |
| 3. Does the institution use the fair value option to measure any of its assets or liabilities? .....   | FT06 |        |    |
| a. Aggregate amount of fair value option assets .....  |      | Amount |    |
| b. Aggregate amount of fair value option liabilities.....  | HK18 |        |    |
| c. Year-to-date net gains (losses) recognized in earnings on fair value option assets .....  | HK19 |        |    |
| d. Year-to-date net gains (losses) recognized in earnings on fair value option liabilities .....   | RIAD |        |    |
|  | F551 |        |    |
|  | F553 |        |    |
|  |      |        |    |
| <b>Servicing, Securitization and Asset Sale Activities</b>   |      |        |    |
| 4. Does the institution have any assets it has sold and securitized with servicing retained or with recourse or other seller-provided credit enhancements? .....   | FT07 |        |    |
| a. Total outstanding principal balance of assets sold and securitized by the reporting institution with servicing retained or with recourse or other seller-provided credit enhancements.....  |      | Amount |    |
| 5. Does the institution have any assets it has sold with recourse or other seller-provided credit enhancements but has not securitized? .....  | FT08 |        |    |
| a. Total outstanding principal balance of assets sold by the reporting institution with recourse or other seller-provided credit enhancements, but not securitized by the reporting institution.....   |      |        |    |
| 6. Does the institution service any closed-end 1–4 family residential mortgage loans for others or does it service more than \$10 million of other financial assets for others? .....  | FT09 |        |    |
| a. Total outstanding principal balance of closed-end 1–4 family residential mortgage loans serviced for others plus the total outstanding principal balance of other financial assets serviced for others if more than \$10 million.....   |      | Amount |    |
|  | FT10 |        |    |
|  | FT11 |        |    |
|  |      |        |    |
|  | FT12 |        |    |
|  |      |        |    |
| <b>Variable Interest Entities</b>  |      |        |    |
| 7. Does the institution have any consolidated variable interest entities? .....  | FT13 |        |    |
| a. Total assets of consolidated variable interest entities <sup>1</sup> .....  |      | Amount |    |
| b. Total liabilities of consolidated variable interest entities.....   | FT14 |        |    |
|  | FT15 |        |    |

1. Institutions should report assets net of any applicable allowance for credit losses.

## Schedule SU—Continued

*All institutions must complete the indicator questions with either a "Yes" or a "No." For questions for which the response is "Yes," the corresponding items must be completed.*

|  | Dollar Amounts in Thousands |        |    |
|--|-----------------------------|--------|----|
|  | RCON                        | Yes    | No |
| <b>Credit Card Lending Specialized Items</b>   |                             |        |    |
| 8. Does the institution, together with affiliated institutions, have outstanding credit card receivables that exceed \$500 million as of the report date or is the institution a credit card specialty bank as defined for Uniform Bank Performance Report purposes? ..... | FT16                        |        |    |
|  |                             |        |    |
| a. Outstanding credit card fees and finance charges included in credit cards to individuals for household, family, and other personal expenditures (retail credit cards) .....   |                             | Amount |    |
|  | C391                        |        |    |
|  | RIAD                        |        |    |
|  | C389                        |        |    |
|  |                             |        |    |
| b. Separate valuation allowance for uncollectible retail credit card fees and finance charges .....  | C390                        |        |    |
| c. Amount of allowance for credit losses on loans and leases attributable to retail credit card fees and finance charges .....   |                             |        |    |
| d. Uncollectible retail credit card fees and finance charges reversed against year-to-date income....  | C388                        |        |    |
|  |                             |        |    |

## ***Optional Narrative Statement Concerning the Amounts Reported in the Consolidated Reports of Condition and Income***

The management of the reporting bank may, *if it wishes*, submit a brief narrative statement on the amounts reported in the Consolidated Reports of Condition and Income. This optional statement will be made available to the public, along with the publicly available data in the Consolidated Reports of Condition and Income, in response to any request for individual bank report data. However, the information reported in Schedule RI-E, item 2.g, and Schedule RC-C, Part I, Memorandum items 17.a and 17.b, is regarded as confidential and will not be made available to the public on an individual institution basis. **BANKS CHOOSING TO SUBMIT THE NARRATIVE STATEMENT SHOULD ENSURE THAT THE STATEMENT DOES NOT CONTAIN THE NAMES OR OTHER IDENTIFICATIONS OF INDIVIDUAL BANK CUSTOMERS, REFERENCES TO THE AMOUNTS REPORTED IN THE CONFIDENTIAL ITEMS IDENTIFIED ABOVE, OR ANY OTHER INFORMATION THAT THEY ARE NOT WILLING TO HAVE MADE PUBLIC OR THAT WOULD COMPROMISE THE PRIVACY OF THEIR CUSTOMERS.** Banks choosing *not* to make a statement may check the "No comment" box below and should make no entries of any kind in the space provided for the narrative statement; i.e., DO NOT enter in this space such phrases as "No statement," "Not applicable," "N/A," "No comment," and "None."

The optional statement must be entered on this sheet. The statement should not exceed 100 words. Further, regardless of the number of words, the statement must not exceed 750 characters, including punctuation, indentation, and standard spacing between words and sentences. If any submission should exceed

750 characters, as defined, it will be truncated at 750 characters with no notice to the submitting bank and the truncated statement will appear as the bank's statement both on agency computerized records and in computer-file releases to the public.

All information furnished by the bank in the narrative statement must be accurate and not misleading. Appropriate efforts shall be taken by the submitting bank to ensure the statement's accuracy.

If, subsequent to the original submission, *material* changes are submitted for the data reported in the Consolidated Reports of Condition and Income, the existing narrative statement will be deleted from the files, and from disclosure; the bank, at its option, may replace it with a statement appropriate to the amended data.

The optional narrative statement will appear in agency records and in release to the public exactly as submitted (or amended as described in the preceding paragraph) by the management of the bank (except for the truncation of statements exceeding the 750-character limit described above). **THE STATEMENT WILL NOT BE EDITED OR SCREENED IN ANY WAY BY THE SUPERVISORY AGENCIES FOR ACCURACY OR RELEVANCE. DISCLOSURE OF THE STATEMENT SHALL NOT SIGNIFY THAT ANY FEDERAL SUPERVISORY AGENCY HAS VERIFIED OR CONFIRMED THE ACCURACY OF THE INFORMATION CONTAINED THEREIN. A STATEMENT TO THIS EFFECT WILL APPEAR ON ANY PUBLIC RELEASE OF THE OPTIONAL STATEMENT SUBMITTED BY THE MANAGEMENT OF THE REPORTING BANK.**

Comments? .....

|      |     |  |    |
|------|-----|--|----|
| RCON | Yes |  | No |
| 6979 |     |  |    |

**BANK MANAGEMENT STATEMENT** (please type or print clearly; 750 character limit):  
(TEXT 6980)