October 20, 2021

Sent Via Email to adam.cohen@stblaw.com and spencer.sloan@stblaw.com

Mr. Adam Cohen  
Mr. Spencer J. Sloan  
Simpson Thacher & Bartlett LLP  
900 G. Street, NW  
Washington, D.C. 20001

Dear Messrs. Cohen and Sloan:

The following relates to the application filed by U.S. Bancorp, Minneapolis, Minnesota (“USB”), to acquire MUFG Union Bank, National Association, San Francisco, California, pursuant to section 3(a)(3) of the Bank Holding Company Act of 1956, as amended. Please provide a complete and detailed response to the following:

1. We would like to assess the effect of the merger on market concentration in small business lending in the banking markets (1) The Big Bear Lake and (2) Hesperia-Apple Valley-Victorville. We usually use county-level data from the CRA reports to do this assessment, but because these two banking markets are both part of San Bernardino County, county-level data is not granular enough. Therefore, please provide the data as in the CRA reports for San Bernardino County but broken down into three separate geographic areas: (1) The Big Bear Lake, (2) Hesperia-Apple Valley-Victorville, and (3) Remainder of San Bernardino County. Please provide the data for 2019 and for 2020. Other than the more granular geographic breakdown please provide the data as required for the CRA report. In particular please provide data for the different loan size buckets in the CRA reports (<$100,000, $100,000-$250,000, and $250,000-$1 million).

Please provide your response via E-APPS within eight business days of this letter. Any information for which confidential treatment is desired should be so labeled and separately bound in accordance with section 261.17 of the Board’s Rules Regarding Availability of Information (12 CFR 261.17). Please also send a copy of your response to the Office of the Comptroller of the Currency and the Department of Justice, Antitrust Division and please provide a copy of the public portion of your response (together with any attachments) directly to the commenters. The email address for the regulators and commenters are contained in the attached sheet.
If you have any questions regarding this letter, please call me at (612) 204-6404. Please send any correspondence related to this letter to my email address: lindaa.anderson@mpls.frb.org.

Sincerely,

/s/ Linda A. Anderson

Linda A. Anderson

Enclosures

c:
Board of Governors (w/o enclosures)
Office of the Comptroller and the Currency
U.S. Department of Justice
Please send a copy of your response to the following regulators:

Mr. John O’Brien
Licensing Manager
Office of the Comptroller of the Currency
425 S. Financial Place, Suite 2700
Chicago, IL  60605
largebanks@occ.treas.gov
jason.almonte@occ.treas.gov
patricia.roberts@occ.treas.gov

Attorney General
U.S. Department of Justice
Antitrust Division
Defense, Industrials, and Aerospace Section/Banking Unit
Liberty Square Building Suite 8700
450 Fifth Street, N.W.
Washington, DC 20530
antitrust.bank@usdog.gov
shannon.mulligan@usdog.gov
erin.grace@usdog.gov

Please send the public portion of your response directly to the commenters:

Mr. Al Pina
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Co-Founder, National MCRC
National Minority Community Reinvestment Co-
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Mr. John Gamboa
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