



# Preservation and Promotion of Minority Depository Institutions

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Report to Congress for 2016





# Preservation and Promotion of Minority Depository Institutions

The Federal Deposit Insurance Corporation Report to Congress for 2016



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# Preservation and Promotion of Minority Depository Institutions

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Pursuant to Section 367 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 and Section 308 of the Financial Institutions Reform, Recovery and Enforcement Act of 1989

## Introduction

Section 308 of the Financial Institutions Reform, Recovery and Enforcement Act of 1989 (FIRREA) established the following goals: to preserve the number of minority depository institutions; to preserve the minority character in cases involving merger or acquisition of a minority depository institution; to provide technical assistance to help prevent insolvency of minority depository institutions; to promote and encourage creation of new minority depository institutions; and to provide for training, technical assistance and educational programs for minority depository institutions.

Pursuant to Section 367 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, this report provides a summary profile of minority depository institutions (MDIs) as of the end of 2016; a description of the FDIC's minority depository institution program; and detailed information on the FDIC's 2016 initiatives supporting minority depository institutions. The FDIC defines an MDI as (1) any Federally insured depository institution where 51 percent or more of the voting stock is owned by minority individuals; or (2) where a majority of the Board of Directors is minority and the community that the institution serves is predominantly minority. Ownership must be by U.S. citizens or permanent legal U.S. residents to be counted in determining minority ownership. The FDIC's [Policy Statement Regarding Minority Depository Institutions](#) (see Attachment 1) provides additional information.

## Summary Profile of Minority Depository Institutions

The FDIC maintains a list and tracks insured MDIs it supervises, i.e. state chartered institutions which are not members of the Federal Reserve System, as well as MDIs that are supervised by the Office of the Comptroller of the Currency (OCC) and the Federal Reserve System.<sup>1</sup> The FDIC takes this broad approach given its role in considering applications for deposit insurance and in resolving institutions in the event an MDI were to fail.

### Structure

As of December 31, 2016, FDIC-insured MDIs totaled 157 institutions with combined total assets of over \$208 billion. (See [Attachment 2, List of Minority Depository Institutions as of December 31, 2016](#).)

At the beginning of 2016, there were 164 FDIC-insured MDIs with combined total assets of approximately \$197 billion. During the year, five MDIs merged into or were acquired by other institutions; one no longer qualified as an MDI after a recapitalization; and one MDI failed, was closed by its state chartering authority, and entered into FDIC receivership. With respect to the five mergers or acquisitions, four MDIs merged with, or were acquired by, other MDIs which preserved their minority character. One of these transactions was with a non-MDI. Three of the MDIs merged or acquired in 2016 were Asian American MDIs and two were Hispanic American MDIs.

The failed institution was an African American

<sup>1</sup> The FDIC's published list of FDIC-insured minority depository institutions does not include women-owned or women-managed institutions because they are not included in the statutory definition.

MDI with \$67 million in assets. It was acquired by a non-MDI through a purchase and assumption transaction at failure, following FDIC efforts to market the institution to other MDIs (see page 6 of this report).

Of the total assets of institutions involved in 2016 MDI acquisitions, mergers or failures, 98 percent (\$14.1 billion of \$14.4 billion in assets) remained in MDI institutions after the transactions.

### *Performance*

As of December 31, 2016, the overall financial performance of FDIC-insured MDIs was mixed. The number of profitable MDIs increased to its highest level since before the crisis, at more than 85 percent of MDIs. The number of unprofitable MDIs, 14.65 percent, is significantly higher than the percentage of community banks and all banks that are unprofitable, at 4.34 and 4.19 percent, respectively. The unprofitable institutions are mostly smaller institutions, many of which are located in urban areas that experienced significant economic distress during the recent financial crisis.

MDI full-year net income of \$1.8 billion fell \$512 million (22.6 percent) from the previous year as three large institutions reported sharp declines in earnings. If these three institutions are excluded, annual earnings increased 20.4 percent. At more than 60 percent of MDIs, annual net income rose year-over-year from 2015 to 2016. Increased net interest income and lower provision expense were the primary contributors to the increase in aggregate net income among these banks.

Higher net interest income partially results from growth in loans and other earning assets. Total earning assets increased \$16.6 billion (9.5 percent) from 2015 as loan balances rose by \$12.1 billion (9

percent). Loan growth at MDIs surpassed the loan growth rate at all community banks by 68 basis points. Most of this growth was in commercial real estate.

Total noncurrent balances decreased \$650 million (14.2 percent) from 2015 to 2016, as 1-to-4 family and nonfarm residential portfolios continue to improve. Total equity capital increased from 2015 by \$2 billion (8 percent) to \$27.1 billion. The Tier 1 leverage ratio increased 2 basis points to 11.64 percent, 93 basis points above the ratio of community banks. All but two institutions were considered well capitalized or adequately capitalized.

Within the MDI sector, performance has been uneven. Generally, smaller MDIs and those serving low- and moderate-income communities continue to face significant challenges, in part reflecting the continuing economic challenges faced by many of the communities they serve.

### **FDIC National Minority Depository Institutions Program**

The FDIC's Minority Depository Institution Program ("MDI Program") is outlined in the FDIC's [Policy Statement Regarding Minority Depository Institutions](#) (see Attachment 1). The FDIC's MDI Program is fully integrated into the supervision, consumer protection and receivership business lines. The FDIC retains a dedicated executive as National Director of Minority and Community Development Banking. In addition to the National Director at headquarters, the FDIC has designated regional MDI coordinators in each of its six regional offices.

The National Director provides overall direction and guidance, and ensures that appropriate

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resources are involved in program initiatives. The National Director works closely with MDIs and their trade associations to seek feedback on the FDIC's efforts under this program, discuss possible training initiatives, and explore options for preserving and promoting minority ownership of depository institutions.

In carrying out this work, the FDIC meets regularly with its Federal banking agency colleagues to discuss outreach efforts, to share ideas, and to identify opportunities where the agencies can work together to assist MDIs. In addition, the FDIC coordinates with other Federal agencies that provide programs that can assist MDIs.

Executives and staff in the FDIC's six regional offices communicate with each MDI regularly to outline the FDIC's efforts to promote and preserve minority ownership of financial institutions; offer to have a member of regional management meet with the institution's board of directors to discuss issues of interest, including through roundtable discussions and training sessions; and to seek input regarding any training or other technical assistance the institution may desire.

## 2016 Initiatives Supporting Minority Depository Institutions

Preservation of MDIs remains a high priority for the FDIC. In 2016, the FDIC continued to support MDI and Community Development Financial Institution (CDFI bank) industry-led strategies for success. These strategies include increased collaboration between MDI and CDFI bankers; partnering to share costs, raise capital, or pool loans; and making innovative use of federal programs. The FDIC supports this effort by providing technical assistance to MDI and CDFI bankers.

During 2016, the FDIC sponsored a discussion between trade groups representing MDIs, CDFI banks, and representatives of potential bank partners, focusing on Community Reinvestment Act (CRA) partnerships. In addition, the FDIC provided technical assistance to a group seeking to develop a private equity fund to invest in MDIs. The FDIC's assistance addressed how non-minority bank investments in the fund might be considered under the Basel Capital rules, the Volcker Rule, and the CRA. Both community banks and larger insured financial institutions have valuable incentives under the CRA to undertake ventures with MDIs, including capital investment and loan participations.

Also in 2016, the FDIC, OCC and Federal Reserve co-hosted a webinar on strategic planning attended by approximately 50 MDIs, and began planning the 2017 Interagency MDI and CDFI Bank Conference, which the agencies will co-sponsor. The conference will be held in Los Angeles, where there is a significant concentration of MDIs. The conference will include an interactive panel featuring FDIC Chairman Martin J. Gruenberg, Federal Reserve Board Governor Jerome H. Powell, and Comptroller of the Currency Thomas J. Curry.

## Technical Assistance

The FDIC continually pursued ways to improve communication and interaction with MDIs and to respond to the concerns of minority bankers during 2016. The FDIC regularly maintains active outreach with MDI trade groups, and annually offers to arrange meetings between regional management and each MDI's board of directors to discuss issues of interest.

The FDIC routinely contacts MDIs to offer return visits and technical assistance following



the conclusion of each safety and soundness, compliance, Community Reinvestment Act, and specialty examination to assist bank management in understanding and implementing examination recommendations. These return visits by examination staff are normally scheduled 90 to 120 days after the examination to provide useful recommendations or feedback for improving operations, not to identify new issues. MDIs also may initiate contact with the FDIC to request technical assistance at any time; the MDI page on the FDIC's website also encourages, and provides contact information for, any MDI to contact the FDIC to request technical assistance at any time.



The FDIC distributed a Community Bank Resource Kit in 2016 to all community banks, including MDIs, with useful tools for community bankers.

In 2016, the FDIC provided 135 individual technical assistance sessions on over 65 risk management and compliance topics, including:

- » accounting,
- » Bank Secrecy Act and Anti-Money Laundering,
- » Basel III Capital rules,
- » brokered deposits/waivers,
- » capital planning,

- » commercial real estate concentrations,
- » Community Reinvestment Act,
- » funding and liquidity,
- » high volatility commercial real estate,
- » information technology risk management and cybersecurity,
- » interest-rate risk,
- » loan underwriting and administration,
- » mortgage lending,
- » strategic planning, and
- » third-party risk management.

## Outreach, Training and Educational Programs

The FDIC's regional offices also held outreach, training and educational programs for MDIs through individual meetings, conference calls and banker roundtables.



MDI bankers C.C. Lee of United Orient Bank and Norman Green of United Bank of Philadelphia attend the FDIC's New York Regional MDI Roundtable in December 2016.

In 2016, topics of discussion for these sessions included many of those listed above, as well as the FDIC's national MDI program; the FDIC's Community Banking Initiative, including the availability of Technical Assistance Videos;

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corporate governance; strategic planning; director responsibilities; compliance guidance; concentration risk management; and bank merger and acquisition.



MDI bankers meet with FDIC Chicago Region officials at the Chicago Regional MDI Roundtable in November 2016.



MDI bankers meet with FDIC San Francisco Region officials at the San Francisco Regional MDI Roundtable in Los Angeles, CA in December 2016.

The FDIC also sponsored a Community Banking Conference in April 2016, *Strategies for Long-Term Success*, a daylong discussion regarding future challenges and opportunities for community banks in the United States.



In opening remarks, FDIC Chairman Gruenberg emphasizes the importance of community banks to the financial system and the economy.

The conference acknowledged the importance of this sector in providing basic banking services and credit for consumers, farms, and small businesses across the United States. The FDIC provided a historical perspective on banking industry consolidation, concluding that community banks have evolved, changed, and grown to meet the needs of their customers and the challenges of the market, demonstrating their resilience in the aftermath of the recent financial crisis and recession.



Chairman of the Board and CEO Rebeca Romero Rainey (third from left) says Centinel Bank of Taos, New Mexico, serves the business community by finding innovative approaches and solutions to their business needs and by building long-term relationships.



Four separate panels addressed some of the challenges facing the sector: the viability of the community banking model; regulatory developments as they pertain to community banks; how technology is affecting these institutions; and how community banks are managing ownership structure and succession planning.

As the vast majority of FDIC-insured MDIs are community banks, these topics were timely and relevant. The MDI banking sector was well represented at the conference with approximately 20 CEOs and MDI trade representatives in attendance, including two MDI CEOs who served as panelists.



President and CEO Alden J. McDonald, Jr. (second from right) says his Liberty Bank and Trust in New Orleans, which serves primarily low- and moderate-income customers in eight states, consistently seeks different business strategies to sustain its high-volume, low-balance business model.

The FDIC emphasized three areas intended to be helpful to community banks: focusing on the principle of tailored supervision, appropriate to the size and complexity of an institution; continuing to build a robust technical assistance program, designed to provide information that can help bankers and their board members address hot-button regulatory and accounting issues; and supporting the creation of *de novo* community banks.

Since the conference, the FDIC has received several inquiries from groups interested in organizing a *de novo* MDI.

## Failing Institutions

In accordance with Section 308 and FDIC Policy, the FDIC seeks to preserve the minority character of failing institutions before and during the resolution process. The FDIC provides ongoing supervisory oversight of institutions prior to failure, through regular onsite examinations, visitations, and off-site monitoring, as well as through numerous offers of technical assistance.

In the event of a potential MDI failure, the FDIC contacts all MDIs nationwide that qualify to bid on failing institutions. The FDIC solicits qualified MDIs' interest in the failing institution and discusses the bidding process. The FDIC also will provide technical assistance regarding completion of the bid forms. During the resolution process, institutions on the final bidders list must be cleared by the appropriate Federal and State regulators.

As noted earlier, one FDIC-insured minority depository institution failed in 2016 and the least cost bidder for the failed bank franchise was not an MDI. This experience was an anomaly, as the FDIC historically has been able to solicit sufficient MDI bidder interest to preserve the minority character in failures (see page 7 of this report).

In 2016, the FDIC offered technical assistance on the bidding process for failing institutions to three MDIs that were considering a joint bid. The assistance covered the FDIC's experience with structured transactions for possible use with failed bank assets and provided guidance on the technical aspects of alliance bidding.

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The FDIC recently updated through 2016 the information published in its 2014 research study, *Minority Depository Institutions: Structure, Performance, and Social Impact*, capturing the impact of structural changes on the assets controlled by MDIs.

The charts below show that from 2002 through 2016, most of the assets of merged and failed MDIs have been acquired by other MDIs, consistent with the Section 308 goal to preserve the minority character in cases involving merger or acquisition of a minority depository institution.

Among MDIs that failed from 2002 through 2016, 86 percent of the total assets were acquired by another MDI, keeping MDI banking relationships within the communities.

MDI Failures, 2002 - 2016				
	Count and Total Assets		Percentages	
	Number	Total Assets (Bil.)	Number	Total Assets
Acquired by MDI	15	\$22.7	38%	86%
Acquired by non-MDI	22	\$3.7	56%	14%
Payout	2	\$0.03	5%	0.1%
Total	39	\$26.5	100%	100%
Source: FDIC. Note: The MDI designations underlying this chart have been updated to reflect revisions in the historical MDI data through year-end 2016.				

The same is true among MDIs that voluntarily merged or consolidated during the same period: 54 percent of the total number – and 76 percent of the total assets – were acquired by another MDI.

MDI Voluntary Mergers and Consolidations, 2002 - 2016				
	Count and Total Assets		Percentages	
	Number	Total Assets (Bil.)	Number	Total Assets
Acquired by MDI	39	\$22.4	54%	76%
Acquired by non-MDI	33	\$7.0	46%	24%
Total	72	\$29.3	100%	100%
Source: FDIC. Note: The MDI designations underlying this chart have been updated to reflect revisions in the historical MDI data through year-end 2016.				

## Conclusion

Minority depository institutions typically promote the economic viability of minority and under-served communities, providing access to capital in their communities. The FDIC has long recognized the importance of MDIs in the financial system and takes steps to preserve and encourage minority ownership of insured financial institutions. MDI bankers provide valuable input and leadership to the FDIC, as active members of two FDIC Advisory Committees that shape FDIC priorities and policy: the Advisory Committee on Economic Inclusion and the Advisory Committee on Community Banking.

The FDIC continually seeks to identify initiatives that will enable it to carry out its commitment to preserve existing minority depository institutions; to preserve the minority character of an institution in cases of merger or acquisition; to provide technical assistance to help prevent insolvency of institutions; to promote and encourage the creation of new minority depository institutions; and to provide for training, technical assistance, and education programs.

## Attachments

Attachment 1: [FDIC's Policy Statement Regarding Minority Depository Institutions](#)

Attachment 2: [List of Minority Depository Institutions as of December 31, 2016](#)

## FDIC Law, Regulations, Related Acts

### 5000 - Statements of Policy

#### POLICY STATEMENT REGARDING MINORITY DEPOSITORY INSTITUTIONS

Minority depository institutions often promote the economic viability of minority and under-served communities. The FDIC has long recognized the importance of minority depository institutions and has historically taken steps to preserve and encourage minority ownership of insured financial institutions.

#### Statutory Framework

In August 1989, Congress enacted the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (“FIRREA”). Section 308 of FIRREA established the following goals:

- » Preserve the number of minority depository institutions;
- » Preserve the minority character in cases of merger or acquisition;
- » Provide technical assistance to prevent insolvency of institutions not now insolvent;
- » Promote and encourage creation of new minority depository institutions; and
- » Provide for training, technical assistance, and educational programs.

#### Definition

“Minority” as defined by Section 308 of FIRREA means any “Black American, Asian American, Hispanic American, or Native American.” Section 308 of FIRREA defines “minority depository institution” as any Federally insured depository institution where 51 percent or more of the voting stock is owned by one or more “socially and economically disadvantaged individuals.” Given the ambiguous nature of the phrase “socially and economically disadvantaged individuals,” for the purposes of this Policy Statement, minority depository institution is defined as any Federally insured depository institution where 51 percent or more of the voting stock is owned by minority individuals. This includes institutions collectively owned by a group of minority individuals, such as a Native American Tribe. Ownership must be by U.S. citizens or permanent legal U.S. residents to be counted in determining minority ownership. In addition to the institutions that meet the ownership test, for the purposes of this Policy Statement, institutions will be considered minority depository institutions if a majority of the Board of Directors is minority and the community that the institution serves is predominantly minority.

#### Attachment 1: FDIC’s Policy Statement Regarding Minority Depository Institutions

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## Identification of Minority Depository Institutions

To ensure that all minority depository institutions are able to participate in the program, the FDIC will maintain a list of Federally insured minority depository institutions. Institutions that are not already identified as minority depository institutions can request to be designated as such by certifying that they meet the above definition. For institutions supervised directly by the FDIC, our examiners will review the appropriateness of an institution being on the list during the examination process. In addition, case managers in our regional offices will note changes to the list while processing deposit insurance applications, merger applications, change of control notices, or failures of minority depository institutions. The FDIC will work closely with the other Federal regulatory agencies to ensure that institutions not directly supervised by the FDIC are accurately captured on our list. In addition, the FDIC will periodically provide the list to relevant trade associations and seek input regarding its accuracy. Inclusion in the FDIC's minority depository institution program is voluntary. Any minority depository institution not wishing to participate in this program will be removed from the official list upon request.

## Organizational Structure

The FDIC has designated a national coordinator for the FDIC's minority depository institutions program in the Washington Office and a regional coordinator in each Regional Office. The national coordinator will consult with officials from the Office of Diversity and Economic Opportunity, the Legal Division, and the Division of Resolutions and Receiverships to ensure appropriate personnel are involved in program initiatives. The national coordinator will regularly contact the various minority depository institution trade associations to seek feedback on the FDIC's efforts under this program, discuss possible training initiatives, and explore options for preserving and promoting minority ownership of depository institutions. As the primary Federal regulator for State nonmember banks, the FDIC will focus its efforts on these institutions. However, the national coordinator will meet with the other Federal regulators periodically to discuss each agency's outreach efforts, to share the ideas, and to identify opportunities where the agencies can work together to assist minority depository institutions. Representatives of other divisions and offices may participate in these meetings.

The regional coordinators are knowledgeable about minority bank issues and are available to answer questions or to direct inquiries to the appropriate office. However, each FDIC-insured institution has previously been assigned a specific case manager in their regional office who will continue to be the institution's central point of contact at the FDIC. At least annually, regional coordinators will contact each minority depository institution directly supervised by the FDIC in their respective regions to discuss the FDIC's efforts to promote and preserve minority ownership of financial institutions and to offer to have a member of regional management meet with the institution's board of directors to discuss issues of interest. Finally, the regional coordinators will contact all new minority State nonmember banks identified through



insurance applications, merger applications, or change in control notices to familiarize the institutions with the FDIC's minority depository institution program.

### **Technical Assistance**

The FDIC can provide technical assistance to minority depository institutions in several ways on a variety of issues. An institution can contact its case manager for assistance in understanding bank regulations, FDIC policies, examination procedures, etc. Case managers can also explain the application process and the type of analysis and information required for different applications. During examinations, examiners are expected to fully explain any supervisory recommendations and should offer to help management understand satisfactory methods to address such recommendations. At the conclusion of each examination of a minority depository institution directly supervised by the FDIC, the FDIC will offer to have representatives return to the institution approximately 90 to 120 days later to review areas of concern or topics of interest to the institution. The purpose of the return visits will be to assist management in understanding and implementing examination recommendations, not to identify new problems. The level of technical assistance provided should be commensurate with the issues facing the institution. As such, institutions where more examination recommendations are made would generally be offered more detailed technical assistance in implementing those recommendations.

FDIC employees can advise on risk management procedures, accounting practices, recruiting techniques, etc., but will not actually perform tasks expected of an institution's management or employees. For example, FDIC employees may explain Call Report instructions as they relate to specific accounts, but will not assist in the preparation of an institution's Call Report. As another example, FDIC employees may provide information on community reinvestment opportunities, but will not recommend a specific transaction.

### **Training and Educational Programs**

The FDIC will work with trade associations representing minority depository institutions and other regulatory agencies to periodically assess the need for, and provide for, training opportunities and educational opportunities. We will partner with the trade associations to offer training programs during their annual conferences and other regional meetings.

The national coordinator and the regional coordinators will also work with trade associations and other organizations to attempt to identify groups that may be interested in establishing new minority depository institutions. FDIC representatives will be available to address such groups to discuss the application process, the requirements of becoming FDIC insured, and the various programs geared toward minority depository institutions.

## **Attachment 1: FDIC's Policy Statement Regarding Minority Depository Institutions**



## **Failing Institutions**

The FDIC will attempt to preserve the minority character of failing institutions during the resolution process. In the event of a potential failure of a minority depository institution, the Division of Resolutions and Receiverships will contact all minority depository institutions nationwide that qualify to bid on failing institutions. The Division of Resolutions and Receiverships will solicit qualified minority depository institutions' interest in the failing institution, discuss the bidding process, and upon request, offer to provide technical assistance regarding completion of the bid forms. In addition, the Division of Resolutions and Receiverships, with assistance from the Office of Diversity and Economic Opportunity, will maintain a list of minority individuals and nonbank entities that have expressed an interest in acquiring failing minority owned institutions. Trade associations that represent minority depository institutions will also be contacted periodically to help identify possible interested parties.

## **Reporting**

The regional coordinators will report their region's activities related to this Policy Statement to the national coordinator quarterly. The national coordinator will compile the results of the regional offices' reports and submit a quarterly summary to the Office of the Chairman. Our efforts to preserve and promote minority ownership of depository institutions will also be highlighted in the FDIC's Annual Report.

## **Internet Site**

The FDIC will create a Webpage on its Internet site ([www.fdic.gov](http://www.fdic.gov)) to promote the Minority Depository Institution Program. Among other things, the page will describe the program and include the name, phone number, and email address of the national coordinator and each regional coordinator. The page will also contain links to the list of minority depository institutions, pertinent trade associations, and other regulatory agency programs. We will also explore the feasibility and usefulness of posting other items to the page, such as statistical information and comparative data for minority depository institutions. Visitors will have the opportunity to provide feedback regarding the FDIC's program and the usefulness of the Webpage.

By order of the Board of Directors, April 9, 2002.

*[Source: 67 Fed. Reg. 18620, April 16, 2002]*



## MINORITY DEPOSITORY INSTITUTIONS (MDIs)

<i>December 31, 2016</i>									
NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS	FDIC REGION	TOTAL ASSETS (5000)
ALAMERICA BANK	BIRMINGHAM	AL	20000128	35314	NM	FDIC	B	Atlanta	38,357
COMMONWEALTH NATIONAL BANK	MOBILE	AL	19760219	22229	N	OCC	B	Atlanta	56,884
BAC FLORIDA BANK	CORAL GABLES	FL	19731012	21265	NM	FDIC	H	Atlanta	1,956,068
BANESCO USA	CORAL GABLES	FL	20060110	57815	NM	FDIC	H	Atlanta	976,057
CENTRAL BANK	TAMPA	FL	20070226	58377	NM	FDIC	A	Atlanta	123,031
CONTINENTAL NATIONAL BANK	MIAMI	FL	19740510	21578	N	OCC	H	Atlanta	489,397
EXECUTIVE NATIONAL BANK	MIAMI	FL	19720607	20711	N	OCC	H	Atlanta	382,720
INTERAMERICAN BANK A FSB	MIAMI	FL	19760823	31823	SB	OCC	H	Atlanta	203,032
INTERCONTINENTAL BANK	WEST MIAMI	FL	20020621	57214	NM	FDIC	H	Atlanta	149,963
INTERNATIONAL FINANCE BANK	MIAMI	FL	19831130	24823	NM	FDIC	H	Atlanta	374,048
OCEAN BANK	MIAMI	FL	19821209	24156	NM	FDIC	H	Atlanta	3,393,766
PLUS INTERNATIONAL BANK	MIAMI	FL	20010914	57083	NM	FDIC	H	Atlanta	83,987
SUNSTATE BANK	MIAMI	FL	19990315	34643	NM	FDIC	H	Atlanta	178,808
TOTALBANK	MIAMI	FL	19740305	21468	NM	FDIC	H	Atlanta	2,947,741
U S CENTURY BANK	DORAL	FL	20021028	57369	NM	FDIC	H	Atlanta	990,128
CARVER STATE BANK	SAVANNAH	GA	19270101	16584	NM	FDIC	B	Atlanta	39,030
CITIZENS TRUST BANK	ATLANTA	GA	19210618	8033	SM	FED	B	Atlanta	394,849
EMBASSY NATIONAL BANK	LAWRENCEVILLE	GA	20070305	58413	N	OCC	A	Atlanta	107,744
<b>Attachment 2: List of Minority Depository Institutions as of December 31, 2016</b>									

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## MINORITY DEPOSITORY INSTITUTIONS (MDIs)

*December 31, 2016*

NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS	FDIC REGION	TOTAL ASSETS (5000)
FIRST INTERCONTINENTAL BANK	DORAVILLE	GA	20000131	34998	NM	FDIC	A	Atlanta	325,680
METRO CITY BANK	DORAVILLE	GA	20060404	58181	NM	FDIC	A	Atlanta	1,102,606
NOA BANK	DULUTH	GA	20081106	58657	NM	FDIC	A	Atlanta	279,853
QUANTUM NATIONAL BANK	SUWANEE	GA	19951227	34110	N	OCC	A	Atlanta	404,272
STATE BANK OF GEORGIA	FAYETTEVILLE	GA	20071105	58599	NM	FDIC	M	Atlanta	81,158
TOUCHMARK NATIONAL BANK	ALPHARETTA	GA	20080128	58687	N	OCC	A	Atlanta	277,461
LUMBEE GUARANTY BANK	PEMBROKE	NC	19711222	20568	NM	FDIC	N	Atlanta	332,641
MECHANICS & FARMERS BANK	DURHAM	NC	19080301	12266	NM	FDIC	B	Atlanta	256,153
SOUTH CAROLINA CMTY BANK	COLUMBIA	SC	19990326	35241	NM	FDIC	B	Atlanta	51,675
FIRST STATE BANK	DANVILLE	VA	19190908	9502	NM	FDIC	B	Atlanta	31,273
AMERICAN METRO BANK	CHICAGO	IL	19970129	34334	NM	FDIC	A	Chicago	63,432
ILLINOIS-SERVICE FS&LA	CHICAGO	IL	19340101	29399	SB	OCC	B	Chicago	105,724
INTERNATIONAL BK OF CHICAGO	CHICAGO	IL	19921026	33708	NM	FDIC	A	Chicago	531,197
MILLENNIUM BANK	DES PLAINES	IL	20070702	58348	NM	FDIC	A	Chicago	85,545
PACIFIC GLOBAL BANK	CHICAGO	IL	19951109	34089	SM	FED	A	Chicago	176,646
SEAWAY BANK&TRUST CO	CHICAGO	IL	19650102	19328	NM	FDIC	B	Chicago	361,197

**Attachment 2: List of Minority Depository Institutions as of December 31, 2016**



## MINORITY DEPOSITORY INSTITUTIONS (MDIs)

*December 31, 2016*

NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS	FDIC REGION	TOTAL ASSETS (5000)
URBAN PARTNERSHIP BANK	CHICAGO	IL	20100819	59051	NM	FDIC	B	Chicago	552,796
METRO BANK	LOUISVILLE	KY	19970106	34308	NM	FDIC	B	Chicago	30,882
FIRST INDEPENDENCE BANK	DETROIT	MI	19700514	20179	NM	FDIC	B	Chicago	234,817
BAY BANK	GREEN BAY	WI	19950821	34052	NM	FDIC	N	Chicago	84,585
COLUMBIA SAVINGS&LOAN ASSN	MILWAUKEE	WI	19240101	28480	SL	FDIC	B	Chicago	24,289
NATIVE AMERICAN BANK NA	DENVER	CO	19870727	27026	N	OCC	N	Dallas	100,062
LIBERTY BANK&TRUST CO	NEW ORLEANS	LA	19721116	20856	NM	FDIC	B	Dallas	625,367
CENTINEL BANK OF TAOS	TAOS	NM	19690301	19904	NM	FDIC	H	Dallas	222,046
MY BANK	BELEN	NM	19920701	33616	SM	FED	H	Dallas	164,837
ALLNATIONS BANK	CALUMET	OK	19010101	4051	SM	FED	N	Dallas	46,480
BANK 2	OKLAHOMA CITY	OK	19030101	11521	SM	FED	N	Dallas	136,031
BANK OF CHEROKEE COUNTY	HULBERT	OK	19081201	2327	SM	FED	N	Dallas	101,905
BANK OF COMMERCE	STILWELL	OK	19310101	422	NM	FDIC	N	Dallas	82,414
BANK OF GROVE	GROVE	OK	20050609	57915	NM	FDIC	H	Dallas	147,601
F&M BANK	EDMOND	OK	19020101	12761	NM	FDIC	N	Dallas	409,577
FIRST NATIONAL BANK&TRUST CO	SHAWNEE	OK	19841029	25738	N	OCC	N	Dallas	245,945
FIRSTBANK	ANTLERS	OK	19010101	14331	SM	FED	N	Dallas	313,171
FORT GIBSON STATE BANK	FORT GIBSON	OK	19730521	21090	NM	FDIC	N	Dallas	59,730

**Attachment 2: List of Minority Depository Institutions as of December 31, 2016**

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS	FDIC REGION	TOTAL ASSETS (5000)
OKLAHOMA STATE BANK	VINITA	OK	19380713	15611	NM	FDIC	N	Dallas	140,985
PEOPLES BANK	WESTVILLE	OK	19030203	2320	NM	FDIC	N	Dallas	47,128
CITIZENS SAVINGS B&T CO	NASHVILLE	TN	19040104	10319	NM	FDIC	B	Dallas	102,396
TRI-STATE BANK OF MEMPHIS	MEMPHIS	TN	19461216	16511	NM	FDIC	B	Dallas	92,947
AMERICAN FIRST NATIONAL BANK	HOUSTON	TX	19980518	34656	N	OCC	A	Dallas	1,364,435
BANK OF SOUTH TEXAS	MCALLEN	TX	19860708	26727	NM	FDIC	H	Dallas	125,214
CITIZENS STATE BANK	ROMA	TX	19780515	22657	NM	FDIC	H	Dallas	82,385
COMMERCE BANK	LAREDO	TX	19820331	23772	NM	FDIC	H	Dallas	585,920
FALCON INTERNATIONAL BANK	LAREDO	TX	19861210	26856	NM	FDIC	H	Dallas	1,110,805
FIRST STATE BANK	SHALLOWATER	TX	19601008	18301	NM	FDIC	A	Dallas	111,778
GOLDEN BANK NATIONAL ASSN	HOUSTON	TX	19850503	26223	N	OCC	A	Dallas	719,092
GREATER STATE BANK	FALFURRIAS	TX	19740101	31762	NM	FDIC	H	Dallas	70,271
INTERNATIONAL BK OF COM	LAREDO	TX	19660902	19629	NM	FDIC	H	Dallas	9,767,095
INTERNATIONAL BK OF COM	ZAPATA	TX	19840206	24961	NM	FDIC	H	Dallas	474,709
INTERNATIONAL BK OF COM	BROWNSVILLE	TX	19841009	25679	NM	FDIC	H	Dallas	930,241
LONE STAR NATIONAL BANK	PHARR	TX	19830124	24347	N	OCC	H	Dallas	2,179,339
ONE WORLD BANK	DALLAS	TX	20050404	57901	NM	FDIC	A	Dallas	77,267

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RIO BANK	MCALLEN	TX	19850211	25886	NM	FDIC	H	Dallas	285,969
SOUTHWESTERN NATIONAL BANK	HOUSTON	TX	19971103	34319	N	OCC	A	Dallas	359,775
STATE BANK OF TEXAS	DALLAS	TX	19871019	27074	NM	FDIC	A	Dallas	740,328
TEXAS NATIONAL BANK	MERCEDES	TX	19201126	3337	N	OCC	H	Dallas	229,855
UNITED BK EL PASO DEL NORTE	EL PASO	TX	20010501	57119	SM	FED	H	Dallas	216,652
UNITY NB OF HOUSTON	HOUSTON	TX	19850801	26351	N	OCC	B	Dallas	100,907
WALLIS STATE BANK	WALLIS	TX	19721028	20845	NM	FDIC	A	Dallas	493,441
ZAPATA NATIONAL BANK	ZAPATA	TX	19611116	18454	N	OCC	H	Dallas	86,517
PINNACLE BANK	MARSHALLTOWN	IA	19270505	252	SM	FED	N	Kansas City	184,499
CBW BANK	WEIR	KS	18920101	13959	NM	FDIC	A	Kansas City	31,041
WOODLANDS NATIONAL BANK	HINCKLEY	MN	19081001	1417	N	OCC	N	Kansas City	175,003
PEOPLES BANK OF SENECA	SENECA	MO	19960315	34146	NM	FDIC	N	Kansas City	163,478
TURTLE MOUNTAIN STATE BANK	BELCOURT	ND	20071203	58586	NM	FDIC	N	Kansas City	32,712
INDUSTRIAL BANK	WASHINGTON	DC	19340818	14679	NM	FDIC	B	New York	382,675
LEADER BANK NATIONAL ASSN	ARLINGTON	MA	20020508	57134	N	OCC	A	New York	1,091,045
ONEUNITED BANK	BOSTON	MA	19820802	23966	NM	FDIC	B	New York	655,171
HARBOR BANK OF MARYLAND	BALTIMORE	MD	19820913	24015	NM	FDIC	B	New York	265,662

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CITY NB OF NEW JERSEY	NEWARK	NJ	19730611	21111	N	OCC	B	New York	240,104
INDUS AMERICAN BANK	ISELIN	NJ	20051212	57983	NM	FDIC	A	New York	233,341
KEB HANA BANK	FORT LEE	NJ	19860916	26790	N	OCC	A	New York	236,396
NEW MILLENNIUM BANK	NEW BRUNSWICK	NJ	19990719	35151	NM	FDIC	A	New York	259,459
ABACUS FEDERAL SAVINGS BANK	NEW YORK	NY	19841129	32257	SB	OCC	A	New York	252,751
AMERASIA BANK	FLUSHING	NY	19880620	27267	NM	FDIC	A	New York	515,151
BANCO POPULAR NORTH AMERICA	NEW YORK	NY	19990102	34967	SM	FED	H	New York	8,629,295
CARVER FEDERAL SAVINGS BANK	NEW YORK	NY	19480101	30394	SB	OCC	B	New York	700,087
CHINATOWN FSB	NEW YORK	NY	19840427	32209	SB	OCC	A	New York	133,454
EASTBANK NATIONAL ASSN	NEW YORK	NY	19841126	25749	N	OCC	A	New York	184,664
FIRST AMERICAN INTL BANK	BROOKLYN	NY	19991115	35186	NM	FDIC	A	New York	815,962
GLOBAL BANK	NEW YORK	NY	20070312	58263	NM	FDIC	A	New York	146,554
NEWBANK	FLUSHING	NY	20060929	58203	NM	FDIC	A	New York	300,076
PONCE DE LEON FEDERAL BANK	BRONX	NY	19600331	31189	SB	OCC	H	New York	744,983
UNITED ORIENT BANK	NEW YORK	NY	19810409	23373	NM	FDIC	A	New York	95,759
ASIAN BANK	PHILADELPHIA	PA	19990609	34759	SM	FED	A	New York	170,375
NOAH BANK	ELKINS PARK	PA	20060717	58196	NM	FDIC	A	New York	334,400

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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS	FDIC REGION	TOTAL ASSETS (5000)
UNITED BANK OF PHILADELPHIA	PHILADELPHIA	PA	19920323	33568	NM	FDIC	B	New York	53,612
BANCO POPULAR DE PUERTO RICO	HATO REY	PR	19990102	34968	SM	FED	H	New York	29,700,000
BANCO SANTANDER PUERTO RICO	SAN JUAN	PR	19721002	20828	NM	FDIC	H	New York	5,339,217
FIRSTBANK PUERTO RICO	SANTURCE	PR	19490117	30387	NM	FDIC	H	New York	11,906,979
ORIENTAL BANK	SAN JUAN	PR	19650325	31469	NM	FDIC	H	New York	6,457,746
SCOTIABANK DE PUERTO RICO	SAN JUAN	PR	19790907	22946	NM	FDIC	H	New York	4,231,596
AMERICAN CONTINENTAL BANK	CITY OF INDUSTRY	CA	20031006	57444	NM	FDIC	A	San Francisco	213,336
AMERICAN PLUS BANK N A	ARCADIA	CA	20070808	58469	N	OCC	A	San Francisco	454,742
AMERICAS UNITED BANK	GLENDALE	CA	20061106	58360	NM	FDIC	H	San Francisco	232,667
ASIAN PACIFIC NATIONAL BANK	SAN GABRIEL	CA	19900725	33013	N	OCC	A	San Francisco	56,059
BANK OF HOPE	LOS ANGELES	CA	19860318	26610	NM	FDIC	A	San Francisco	13,435,929
BANK OF THE ORIENT	SAN FRANCISCO	CA	19710317	20387	SM	FED	A	San Francisco	568,347
BANK OF WHITTIER NA	WHITTIER	CA	19821220	24211	N	OCC	A	San Francisco	59,866
BROADWAY FEDERAL BANK FSB	LOS ANGELES	CA	19470226	30306	SB	OCC	B	San Francisco	426,686
CALIFORNIA BUSINESS BANK	LOS ANGELES	CA	20051101	58037	NM	FDIC	A	San Francisco	79,667

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MEGA BANK	SAN GABRIEL	CA	20080205	58401	NM	FDIC	A	San Francisco	330,019
METROPOLITAN BANK	OAKLAND	CA	19830901	25869	NM	FDIC	A	San Francisco	146,937
MISSION NATIONAL BANK	SAN FRANCISCO	CA	19820216	23749	N	OCC	A	San Francisco	274,910
NEW OMNI BANK NATIONAL ASSN	ALHAMBRA	CA	19800212	23086	N	OCC	A	San Francisco	435,696
OPEN BANK	LOS ANGELES	CA	20050610	57944	NM	FDIC	A	San Francisco	759,597
PACIFIC ALLIANCE BANK	ROSEMEAD	CA	20061227	58234	NM	FDIC	A	San Francisco	273,877
PACIFIC CITY BANK	LOS ANGELES	CA	20030918	57463	NM	FDIC	A	San Francisco	1,226,671
PACIFIC COMMERCE BANK	LOS ANGELES	CA	20021010	57065	SM	FED	A	San Francisco	539,197
PREFERRED BANK	LOS ANGELES	CA	19911223	33539	NM	FDIC	A	San Francisco	3,223,468
ROYAL BUSINESS BANK	LOS ANGELES	CA	20081118	58816	NM	FDIC	A	San Francisco	1,393,564
STATE BANK OF INDIA CA	LOS ANGELES	CA	19820903	23998	NM	FDIC	A	San Francisco	622,694
UNITED PACIFIC BANK	CITY OF INDUSTRY	CA	19820511	23805	NM	FDIC	A	San Francisco	122,438
UNITI BANK	BUENA PARK	CA	20011217	57120	NM	FDIC	A	San Francisco	263,113
UNIVERSAL BANK	WEST COVINA	CA	19541117	30722	SB	OCC	A	San Francisco	352,181
US METRO BANK	GARDEN GROVE	CA	20060915	58310	NM	FDIC	A	San Francisco	194,628

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<i>December 31, 2016</i>									
NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS	FDIC REGION	TOTAL ASSETS (5000)
CALIFORNIA INTERNATIONAL BANK, N.A.	WESTMINSTER	CA	20051130	57974	N	OCC	A	San Francisco	53,552
CALIFORNIA PACIFIC BANK	SAN FRANCISCO	CA	19801016	23242	NM	FDIC	A	San Francisco	97,991
CATHAY BANK	LOS ANGELES	CA	19620419	18503	NM	FDIC	A	San Francisco	14,483,815
COMMERCIAL BANK OF CA	IRVINE	CA	20030515	57417	NM	FDIC	H	San Francisco	810,695
COMMONWEALTH BUSINESS BANK	LOS ANGELES	CA	20050303	57873	SM	FED	A	San Francisco	913,194
COMMUNITY COMMERCE BANK	CLAREMONT	CA	19761001	26363	NM	FDIC	H	San Francisco	186,973
CTBC BANK CORP USA	LOS ANGELES	CA	19650427	19416	NM	FDIC	A	San Francisco	2,957,652
EAST WEST BANK	PASADENA	CA	19720101	31628	SM	FED	A	San Francisco	34,750,506
EASTERN INTERNATIONAL BANK	LOS ANGELES	CA	19850226	32277	NM	FDIC	A	San Francisco	114,344
EVERTRUST BANK	PASADENA	CA	19950503	34010	NM	FDIC	A	San Francisco	853,873
FIRST CHOICE BANK	CERRITOS	CA	20050818	57966	NM	FDIC	A	San Francisco	863,410
FIRST COMMERCIAL BANK USA	ALHAMBRA	CA	19970520	34496	NM	FDIC	A	San Francisco	498,242
FIRST GENERAL BANK	ROWLAND HEIGHTS	CA	20051013	58060	NM	FDIC	A	San Francisco	840,573
GATEWAY BANK FSB	OAKLAND	CA	19900608	33103	SB	OCC	A	San Francisco	139,509
HANMI BANK	LOS ANGELES	CA	19821215	24170	NM	FDIC	A	San Francisco	4,695,776
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NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS	FDIC REGION	TOTAL ASSETS (5000)
ANZ GUAM INC	HAGATNA	GU	19910111	33316	NM	FDIC	A	San Francisco	376,042
BANK OF GUAM	HAGATNA	GU	19721211	20884	NM	FDIC	A	San Francisco	1,918,461
BANKPACIFIC LTD	HAGATNA	GU	19530101	30692	SL	FDIC	A	San Francisco	141,894
FINANCE FACTORS LTD	HONOLULU	HI	19520514	25158	NM	FDIC	A	San Francisco	573,220
HAWAII NATIONAL BANK	HONOLULU	HI	19600916	18296	N	OCC	A	San Francisco	668,541
OHANA BANK	HONOLULU	HI	20060601	58231	NM	FDIC	A	San Francisco	130,507
EAGLE BANK	POLSON	MT	20060725	58282	NM	FDIC	N	San Francisco	63,682
PLAZA BANK	SEATTLE	WA	20060607	58305	NM	FDIC	H	San Francisco	72,898
UNIBANK	LYNNWOOD	WA	20061101	58407	NM	FDIC	A	San Francisco	258,451
TOTAL			COUNT	157				208,243,446	
					COUNT	MINORITY STATUS			
					24	B - Black or African American			
					39	H - Hispanic American			
					75	A - Asian or Pacific Islander American			
					18	N - Native American or Alaskan Native American			
					1	M - Multi-racial American			
					CLASS	DEFINITIONS OF CLASS TYPES			
					103	NM - State bank, not a member of the Federal Reserve			
					16	SM - State bank, member of the Federal Reserve			
					27	N - National bank			
					2	SL - State or Federal savings and loan association			
					9	SB - State or Federal savings bank			
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<u>REGULATOR</u>					105 FDIC - Federal Deposit Insurance Corporation 36 OCC - Office of the Comptroller of the Currency 16 FED - Federal Reserve				
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