



PUBLIC DISCLOSURE

April 2, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

TD Bank, N.A.
Charter Number 24096

2035 Limestone Road
Wilmington, DE 19808

Office of the Comptroller of the Currency

Large Bank Supervision
400 7th Street S.W.
Washington, DC 20219

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Outstanding**.

The following table indicates the performance level of TD Bank, N.A. with respect to the Lending, Investment, and Service Tests:

Performance Levels	TD Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- A good level of lending activity;
- A good distribution of loans by income level of geography;
- A good distribution of loans by income of the borrower;
- An excellent level of community development (CD) lending activity had a significantly positive impact on the bank’s overall Lending Test rating. During the evaluation period, the bank’s level of CD lending increased throughout their footprint. Bankwide CD lending totaled approximately 4.2 billion, which is 28.4 percent of tier one capital;
- An excellent level and responsiveness of qualified investment activity;
- Delivery systems are accessible to geographies and individuals of different income levels throughout the institution’s assessment areas (AAs);
- The bank’s branches and alternative delivery systems were effective and responsive in helping the bank provide services across the communities in which it operates. This was evidenced by the following: the bank’s branch distribution, especially in low- and moderate-income (LMI) geographies; increased access to products and services was provided by branches in middle- and upper-income geographies that were in the same

neighborhood as LMI areas in many full-scope areas; and the addition of nearly 200 deposit-taking ATMs in many AAs, over half of which were in LMI areas; and

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities. The majority of CD service hours provided were centered in financial education, including homebuyer and financial literacy education for adults and youth, and financial education for small business owners. In many full-scope areas, one or more of these financial education categories were an identified need.

Refer to Tables 1-15, and O through R, in Appendix D for the facts and data that support all Test conclusions under the individual rating areas, for both full-scope and limited-scope reviews.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (AGG): The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area (MA)/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under Housing and Urban Development (HUD) Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC)

annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division (MD): As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

TD Bank, N.A. (TDBNA), with its main office in Wilmington, Delaware, is the principal subsidiary of TD Bank US Holding Company (TDBUSH), a \$380.9 billion bank holding company, ranked as the 9th largest bank holding company in the United States (U.S.) by assets as of December 31, 2017. TDBUSH, which also owns TD Bank USA, N.A., is part of the larger TD Bank Group, headquartered in Toronto, Canada.

As of December 31, 2017, TDBNA reported total assets of \$288.3 billion and tier one capital of \$24.5 billion. The bank's loans comprise 49.2 percent of total assets and are distributed as follows: 41.0 percent real estate loans; 23.0 percent commercial loans; 19.0 percent consumer loans; and 17.0 percent other loans and leases. As of December 31, 2017; total deposits were \$246.4 billion; however, for analysis purposes we excluded approximately \$91.0 billion within the Philadelphia-Camden-Wilmington multistate metropolitan statistical area (MMSA) which consists solely of the sweep deposits of TD Ameritrade, a bank affiliate. We also considered the impact of an infusion of capital that occurred at the end of the evaluation period. The net tier one capital was adjusted proportionally, resulting in adjusted tier one capital of \$14.6 billion for use as the capital figure in our analysis of community development lending and investment performance.

TDBNA operates approximately 1,251 branches and 2,050 deposit-taking ATMs in the following 15 states and the District of Columbia: Connecticut, Delaware, Florida, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, North Carolina, Pennsylvania, Rhode Island, South Carolina, Vermont, and Virginia. There are 64 assessment areas (AAs) delineated, which includes six MMSAs where the bank operates in at least two states. We determined all AAs consist of whole geographies and meet the requirements of the regulation. The areas reasonably reflected the different trade areas that the bank's branches could service and did not arbitrarily exclude any LMI areas.

TDBNA provides a broad range of services including real-estate, commercial and consumer loans; deposit products and services; as well as trust and financial advisory services to personal, business, corporate, and institutional clients. The TDBNA strategic focus has shifted over time toward a more small business lending focused model. This is reflected in the ratio of loans to small businesses compared to home mortgages, which has increased from 50/50 respectively to approximately 60/40 since the prior evaluation.

In September 2017, TDBNA acquired Scottrade Bank, a federal savings association with no retail branches, and merged it into TDBNA. While TDBNA closed the Scottrade retail deposit accounts in early 2018, as a result of the acquisition, tier one capital increased accordingly. As noted earlier, an adjustment was made for analysis purposes due to the fact that the acquisition occurred in the final calendar quarter of the 16-quarter evaluation period. Approximately 1,811 mortgages originated by Scottrade during the evaluation period, and not considered in the analysis of any other lender, were included in the lending data for the evaluation period.

At the bank's request, we considered grants and investments originated by the bank's affiliates, TD Charitable Foundation and TD Community Capital Group respectively, under the

Investment Test. No other affiliate activity was considered in our analysis. Please refer to Appendix A for information on the subsidiaries, affiliates, and products reviewed during this evaluation.

Currently, there are no legal or financial impediments to TDBNA's ability to help meet the credit needs within its communities.

TDBNA was rated Satisfactory at its last CRA evaluation by the OCC dated December 31, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation considered TDBNA's HMDA-reportable loans on a consolidated basis (combined home purchase, home improvement, and home refinance) and small loans to businesses for the calendar years 2014, 2015, 2016, and 2017. CD lending, qualified investments, CD services, and retail services were evaluated for the period beginning January 1, 2014 and ending December 31, 2017.

The Lending Test evaluation for HMDA-reportable loans and small loans to businesses was affected by the last available implementation of census tract income level designations. These became effective January 1, 2017 as a result of the U.S. Census Bureau's 2015 American Community Survey (ACS). Due to this change, the Lending Test evaluation period has been divided into two segments as follows:

January 1, 2014 – December 31, 2016: 2010 Census data used in the analysis for this period.

January 1, 2017 – December 31, 2017: 2015 ACS Census data used in the analysis for this period.

The standardized tables (see Appendix D) have been included only for the 2014-2016 segment of the evaluation period, however; an analysis of the 2017 loan data is contained in the narrative and has been factored into the assigned ratings.

Data Integrity

Prior to the start of this evaluation, we tested the accuracy of the bank's CRA small business lending data. We also reviewed the appropriateness of CD activities provided for consideration in our evaluation. This included the testing of CD grants and services to ensure they met regulatory definitions. We determined the data reported publicly and the additional data provided for this evaluation are accurate.

For HMDA data, we relied on the Consumer Financial Protection Bureau (CFPB) evaluation of TDBNA's data collection systems and internal controls for ensuring the accuracy of the data.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review; each MMSA was subject to a full-scope review at the MMSA level. The area selected was typically the MSA or AA that contained the largest percentage of bank deposits within the rating area and/or where the bank's presence and activity are significant to the community. Refer to the "Scope" section under each state and MMSA rating section (as applicable) for details regarding the selection of full-scope areas.

Ratings

The bank's overall rating is a blend of the MMSA ratings and state ratings. The emphasis of the rating areas in our overall conclusions is based upon their relative representation of deposit markets to the bank. The two rating areas with the most emphasis account for 60.5 percent of adjusted domestic deposits and the top four rating areas, account for 75.6 percent. In order of significance, the areas are: New York-Northern New Jersey-Long Island NY-NJ-PA MMSA; Philadelphia-Camden-Wilmington MMSA; state of Florida with the Miami-Fort Lauderdale-Pompano-Deerfield and Tampa-St. Petersburg-Clearwater MSAs having the greatest influence over the state rating; Boston-Cambridge-Quincy MA-NH MMSA; Connecticut with the Hartford and New Haven-Milford MSAs having the greatest influence over the state rating; Massachusetts with the Springfield and Worcester MSAs having the greatest influence over the state rating; New Hampshire; South Carolina with the Greenville-Anderson-Mauldin MSA having the greatest influence over the state rating; Maine with the Portland MSA and non-MSA AA having the greatest influence over the state rating; Washington-Arlington-Alexandria MSA; New Jersey with the Atlantic City and Trenton MSAs having the greatest influence over the state rating; Vermont; New York with the Albany-Schenectady-Troy MSA having the greatest influence over the state rating; North Carolina with the Asheville MSA having the greatest influence over the state rating; Allentown-Bethlehem-Easton MMSA; Providence MMSA; Maryland; and Delaware with the Dover MSA having the greatest influence over the state rating. The MMSA ratings and state ratings are based primarily on conclusions drawn on those areas that received full-scope reviews, but the bank's performance in areas receiving limited-scope reviews is also considered. Refer to the "Description of Institution's Operations" or "Scope" section under each state and MMSA rating section for details regarding how the areas were weighted in arriving at the respective ratings.

OCC Community Affairs Officers updated or completed contacts in full-scope AAs for this evaluation. Interviews were conducted with a variety of community organizations including low-income housing agencies, small business development centers, and social service and community action organizations. We also reviewed existing contacts made during the evaluation period with community groups, local government representatives, realtors, and business leaders within the various AAs, as well as public comments received by the bank or the OCC. Information from these community contacts for the primary rating areas are summarized, as needed, in the community profiles found in Appendix C.

Ascertainment of the financial needs of the community is an ongoing process within TDBNA, to better understand the community development needs and how and whether the bank products and services are meeting the needs of LMI individuals and families as well as small businesses. TDBNA held a series of community meetings in 2016 to assist in identifying

needs both across the footprint and specific to each AA. Additionally, in late 2016, TDBNA formed a Community Development Leadership Council (Council). The Council is a partnership with the National Association of Community Economic Development Association. The Council met three times in 2017. The following critical needs were consistently identified across the bank's AAs: small dollar loans and access to capital for small businesses; affordable housing; financial literacy; and basic human services to LMI individuals. Based in part on this feedback, TDBNA enhanced their grant program, enhanced small business lending process and developed lines of credit for small business, and publicized how the communities can access TDBNA volunteers and financial literacy programs.

The following factors and analysis were used in determining the ratings for the Lending, Investment, and Services Tests throughout all of the bank's rating areas:

Lending Test

For the various loan products considered under the Lending Test, small loans to businesses received greater emphasis than home mortgage loans in developing our conclusions due to a greater volume of small loans to businesses during the evaluation period.

Throughout all rating areas, we gave equal emphasis to the geographic and borrower distribution components of the Lending Test, except in AAs where there were few or no LMI geographies which would prevent sufficient data for analysis of geographic or borrower distribution. The volume of CD loans and the degree of responsiveness of those loans to the needs in the community were considered in the lending evaluation. The lack of CD lending in an AA either neutrally or negatively impacted the Lending Test rating to the extent of opportunity, responsiveness, and performance context. In situations where the bank's CD lending positively impacted the rating, it is described in the conclusions for the rating area. We compared the dollar amount of CD loans to the tier one capital allocated to the AA to gain a common perspective regarding the volume of CD lending activity. Tier one capital was allocated to the rating areas and AAs based on the percentage of bank deposits in those AAs. The bank having adequately addressed the needs of its assessment areas, consideration was also given to CD loans made in the bank's broader statewide and regional areas.

In our analysis of the distribution of loans to geographies with different income levels, we gave greater consideration to the bank's performance in moderate-income tracts if there were limited numbers of owner-occupied housing units or businesses in the low-income tracts as the limited number of owner-occupied units limits the bank's opportunity to make loans within these geographies. For borrower distribution, we considered the impact poverty levels had on the demand for mortgages from low-income individuals and the affordability or high cost of housing in some markets. The costs associated with financing homeownership has a more significant impact on the opportunity to lend to low-income populations where a larger proportion of the individuals and families fall below the poverty line.

We did not analyze or draw conclusions on a particular loan type if less than twenty-five loans were made in an AA during the evaluation period. This occurred most often with multifamily loans and loans to small farms; therefore, we generally did not include multifamily lending or loans to small farms in our analysis unless specifically noted within the area Lending Test.

Generally, we found that analysis on fewer than twenty-five loans did not support meaningful conclusions.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed TDBNA's home mortgage and small business geographic lending patterns over the evaluation period. We did not identify any unexplained conspicuous gaps in any of the areas under review.

Inside/Outside Ratio

We considered the volume of loans made inside TDBNA's AAs a positive factor in our evaluation of lending performance. We analyzed the volume of bank loan originations and purchases within the bank's AAs versus those made outside the bank's AAs at the bank level. Our conclusions in this area were based solely on bank originations and purchases and did not include any affiliate data.

At the bank level, TDBNA originated or purchased the substantial majority of their loans within the combined AAs during the evaluation period. Specifically, 95.0 percent of home mortgage loans and 97.5 percent of small business loans were made within TDBNA's AAs.

Flexible Loan Programs

The bank offers a proprietary Right Step mortgage loan for eligible LMI borrowers. The eligibility standards were expanded during the evaluation period to also allow non-low or moderate-income borrowers to qualify for properties located in LMI geographies, if owner-occupied. The Right Step offers a reduced down-payment as low as three percent and does not require private mortgage insurance. During the evaluation period, the bank began to offer the Fannie Mae Home Ready 30 and 15-year fixed-rate mortgages. Home Ready offers a reduced down-payment as low as three percent and a lower mortgage insurance requirement than a conventional mortgage. In those areas where this product was given positive consideration, it is noted within the Lending Test of the respective AA.

TDBNA also began working with with Accion, a nationwide non-profit organization, to increase access to credit for small businesses by implementing a referral program for potential clients to Accion to meet their credit needs when a TDBNA small business loan product was not the correct fit. During the evaluation period, TDBNA and Accion worked together to provide small business owners with access to the right capital and financial education to improve and strengthen their business and communities to empower entrepreneurship. In 2017, the first year of the program, the bank referred 44 loans to Accion helping to create or retain 117 jobs in their communities.

Investment Test

We considered the volume of qualified investments made during the current evaluation period and qualified investments that were made prior to the current evaluation period and still outstanding. The amount of consideration given to the current and prior period investments is

based on the responsiveness of the investments to the needs in the AAs. We compared the dollar amount of qualified investments made in the current evaluation period and prior evaluation periods to the tier one capital allocated to the AAs to gain a common perspective regarding the volume of investment activity. Tier one capital was allocated to the rating areas and AAs based on the percentage of bank deposits in each AA. Consideration was also given to qualified investments made in the bank's broader statewide and regional areas, the bank having adequately addressed the needs of its assessment areas.

Grants that reflected ongoing relationships with community development organizations, filled a critical need, and where TDBNA provided leadership rolls received the most consideration in our analysis. An example is TDBNA's Housing for Everyone grant competition. Housing for Everyone is an annual grant competition that supports the development and preservation of affordable housing. Each year the grant competition has a theme based on survey input from prior applicants and winners. At the end of the annual competition, 25 non-profit community development organizations throughout TDBNA's footprint are awarded \$125 thousand grants, for an annual total of \$3.1 million. The grants support housing projects submitted by the 25 winning organizations that focus on addressing the needs of families and individuals seeking housing assistance. Since its inception, the Housing for Everyone program has provided 422 grants totaling over \$25 million.

Service Test

Primary consideration is given to the bank's performance in delivering retail products and services to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in LMI geographies, but also considered branches in middle- and upper-income geographies that are up to one-half mile or less in proximity to LMI geographies and served individuals in those geographies. Where the bank opened or closed branches within an AA, the overall impact of the changes was evaluated. If no branches were opened or closed in an AA, we did not include that performance element in our analysis.

In our analysis we placed limited emphasis on the bank's alternative distribution channels, internet and phone banking because there was limited data on how these products serve LMI individuals. During the evaluation period, the bank made an investment to increase the number of deposit-taking ATM's throughout its AAs to improve service and access and meet the convenience needs of consumers. A total of 191 deposit-taking ATMs were added of which 106 are in LMI geographies, bringing the total of deposit-taking ATMs to 2,050, 566 of which are in LMI geographies.

We evaluated the range of services and products offered by all of the bank's branches. Services and products offered at branches are consistent throughout the branch network. We specifically focused on differences in branch hours and services in LMI geographies compared to those in middle- or upper-income geographies. The bank's record of providing CD services was evaluated in AAs that received full-scope reviews. Our primary consideration was the responsiveness of TDBNA to the needs of the community. Services that reflected ongoing relationships and where TDBNA provided leadership rolls received the most consideration in our analysis.

Bank-wide Retail and Community Development Services:

Retail Products

The Bank offers competitive checking account products to meet the needs of LMI individuals and unbanked individuals and families. The Bank's willingness to open checking accounts without a credit check distinguishes it from many of its large bank competitors.

The bank's TD Simple Checking account offers the following features:

- No barriers to open the account and no credit check;
- No minimum opening deposit;
- No minimum balance requirement;
- Low monthly maintenance fee;
- Free instant issue debit card, and;
- Free access to online banking and statements, bill pay, and direct deposit.

The bank's TD Student Checking account offers the following features to qualifying full-time students:

- No barriers to open the account and no credit check;
- No minimum opening deposit;
- No minimum balance requirement;
- No monthly maintenance fee;
- Free instant issue debit card, and;
- Free access to online banking and statements, bill pay, and direct deposit.

In March 2015, the bank introduced TD Connect, a general purpose reloadable card that offers the convenience of a debit card. This card can be used to compliment an existing checking account or can be used as a checking account alternative. The TD Connect card provides customers with a full banking experience. The card is purchased at a branch location and money is loaded onto the card. It can be funded and reloaded with cash, checks, internal transfers, or direct deposit at no cost. The card has a low monthly maintenance fee. Metrics on checking account or TD Connect card usage by LMI customers was not available during our examination.

Community Development Services – General

Volunteer Donation Program

A bank-wide initiative exhibiting management's commitment to promoting employee volunteerism in qualifying organizations is the Volunteer Donation Program. Started in the prior evaluation period and continuing through the current evaluation period, bank employees are encouraged to perform qualifying CD services in an organization of their choice. As part of the program, once the employee performs 40 hours of service, the bank, through the employee, provides a \$500 donation to the organization. Any bank employee is eligible to participate in this program.

Disaster Relief

During the evaluation period, the bank was responsive to communities impacted by natural disasters including Hurricanes Irma, Maria, and Matthew. Specifically, in addition to grants made to disaster relief organizations serving impacted areas, which are included in the Investment Test analysis, the bank provided assistance to impacted individuals in the form of waived or refunded monthly maintenance, overdraft, late, and non-proprietary ATM fees, totaling over \$10 million. The bank also waived late fees for mortgage, home equity loan, small business, and consumer loans for impacted borrowers during a nine week period in September through November 2017. During this same timeframe the bank did not bill impacted credit card customers finance charges or late fees, which resulted in customer relief of \$1.4 million. Impacted customers were also allowed to withdraw certificates of deposit funds without early withdraw penalties. Additionally, TDBNA's two Mobile Banking Centers (MBC) were mobilized to assist consumers in the impacted areas in the aftermath of Hurricane Irma. The MBCs each contain one teller, two ATMs and offer access to a 4G internet wifi network. They provide customers and non-customers many of the same services as a traditional branch, with the caveat of check cashing limits to ensure the service is available to all customers, given the finite amount of cash available onboard.

Community Development Services – Financial Literacy and Education

The Bank has expanded its commitment to financial literacy and education, maintained through proprietary programs, and support of financial literacy programs offered by community-based organizations (CBOs) or governmental entities. A differentiator of TD Bank's financial education program is TD Bank employees' volunteer to teach these lessons in person as a service to their communities. This in person facilitation is widely used for the adult, youth, small business, and home buying curriculum.

WOW!Zone Financial Literacy Program

The Bank's WOW!Zone, a proprietary comprehensive K-12 financial literacy program which meets the National Council of Teachers of Mathematics standards, addresses the need for middle and high school money skills identified in the bank's ascertainment surveys. The WOW!Zone lesson plans provide educators with a free, interactive program to introduce topics such as: the value of money, the difference between saving and spending, balancing a check book, planning a budget, and making investments.

The Bank's WOW!Zone trained instructors are available upon request to visit classrooms and provide instruction. Teachers and/or community group leaders can take advantage of the in-person facilitator (a TD Bank employee), or download the lesson plans and material to teach directly to their audience independently. Both options are available and completely free to teachers and community organizations in need of financial education materials.

During the evaluation period, the Bank conducted 883 WOW!Zone classes with over 34 thousand students. A majority of these classes were taught to students eligible for free and reduced lunch.

TD Learning Center

The bank launched the TD Learning Center in 2016, an online training program. These interactive modules are accessible through TDBank.com and offer additional information on multiple financial topics such as credit scores, home ownership, identity protection, taxes, financing higher education, insurance, and mortgage modifications. These modules are available to customers and non-customers at no cost and are available in both English and Spanish, and also offer closed captioning, making it more accessible to the people in their communities.

Financial Literacy Seminars/Workshops

The Bank's retail and commercial employees continue to conduct or sponsor first-time homebuyer seminars and small business workshops across its AAs. During the evaluation period, the bank supported 1,705 first-time homebuyer seminars and 1,701 small business workshops in its AAs.

Small Business Banking Financial Education Lessons

Part of the bank's commitment to its communities is supporting small businesses through a new set of financial education tools to better equip small business owners for success. This is accomplished through one-on-one customer meetings in regional seminars and newly developed small business banking financial education workshops that cover several topics: developing a business plan, assessing a company's financial needs, running a profitable company, analyzing the competition, and how to conduct a market analysis. These lessons are also accessible via TDBank.com through TDBNA's Small Business Resource Center. This resource center is available to customers and non-customers, and offers helpful tools and resources to small business owners.

Home Buying Seminars

The bank offers home buying seminars to help consumers understand the complexities of preparing for home ownership, budgeting, and the mortgage and closing process. These seminars are often held in conjunction with local community groups that work with first-time homebuyers, but can also be held at bank branches. In addition to this instructor led seminar, TD also offers a downloadable First Time Homebuyers' kit as a resource available to customer and non-customers through the TDBank.com website.

Community Development Services – Broader Regional Area Services

During the evaluation period, three bank employees provided 129 hours of qualifying CD services to three organizations in the bank's broader regional area. These organizations have a purpose/mandate/function to serve one or more of the bank's AAs, and provide affordable housing and economic development services to the communities they serve. Bank employees provided service through board and committee membership.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution, or any affiliate whose loans have been considered as part of the institution's lending performance, has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Allentown-Bethlehem-Easton, PA-NJ MMSA

CRA rating for the Allentown-Bethlehem-Easton PA-NJ¹: Outstanding

The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is good, based upon excellent home mortgage lending and good small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon excellent home mortgage lending and good small business lending.
- Community development lending is excellent and has a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are accessible to geographies and individuals of different income levels in the AA. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Allentown-Bethlehem-Easton PA-NJ MMSA

TDBNA's operations in the Allentown-Bethlehem-Easton PA-NJ MMSA (Allentown MMSA) were assessed at the MMSA level. The Allentown MMSA AA is defined as a portion of the full MMSA consisting of Lehigh and Northampton counties in Pennsylvania and Warren County, New Jersey. TDBNA has approximately \$562 million in TDBNA deposits within this AA representing 0.4 percent of the bank's adjusted total domestic retail deposits. As of June 30, 2017, TDBNA ranked seventh with a deposit market share of 3.4 percent. Major banking competitors include Wells Fargo Bank, N.A., Branch Banking and Trust Company, PNC Bank, N.A., and Lafayette Ambassador Bank with deposit market shares of 20.5 percent, 12.2 percent, 12.0 percent, and 7.7 percent, respectively. Banking competition is moderate with 32

¹ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

FDIC-insured depository institutions in the Allentown MMSA. TDBNA has a relatively small presence in the MMSA with only eight branches and 10 deposit-taking ATMs. Given its small scale presence, during the evaluation period, TDBNA made only 0.7 percent of their HMDA loans and 0.5 percent of their small business loans within the MMSA.

Refer to the community profile for the Allentown MMSA in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Allentown MMSA

TDBNA's performance in the Allentown MMSA was assessed at the MMSA level.

Five community contacts were performed in the MMSA related to this evaluation. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALLENTOWN MMSA

LENDING TEST

Lending Activity

Refer to Table 1 in the Allentown MMSA section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Based on the data in Table 1, and the following performance context considerations, we concluded lending activity is adequate. TDBNA originated an adequate volume of loans in the MMSA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares and rankings in mortgage loans and small loans to businesses are weaker than the bank's market share and ranking in deposits. TDBNA's presence in the market, consisting of eight branches, is limited. The limited presence, combined with strong loan competition and concentrations of loans held by a few large competitors creates constraints for the bank in achieving high volumes of loans.

TDBNA has a deposit market share of 3.4 percent, resulting in a market ranking of seventh out of 32 deposit-taking institutions. The five largest institutions, based upon deposit market share, hold 59.0 percent of the deposit market. The larger institutions have significantly larger branch networks than TDBNA.

The bank has a market share of 1.0 percent for mortgage lending and is the 22nd-ranked lender out of 545 lenders in the MMSA. The market is highly competitive and consists of national and local lenders, including national megabanks. The five largest mortgage lenders

have captured 24.0 percent of the market. Comparing the bank's ranking to the number of lenders, TDBNA is in the fourth percentile of all mortgage lenders in the MMSA.

The bank has a market share of 1.2 percent for small business lending and is the 16th-ranked lender out of 121 lenders. The market is also very competitive and consists of national and local lenders of varying size. It also includes large issuers of small business credit cards. The five largest lenders have captured 51.0 percent of the market for small loans to businesses. Comparing TDBNA's ranking for small business lending to the number of lenders in the MMSA, the bank is in the 13th percentile for small business lenders.

Although lending market shares and rankings are weaker than the bank's deposit market share and ranking, comparison of the bank's percentile ranking within the respective markets provides a more accurate assessment of the bank's performance relative to the level and nature of its competition. The bank's lending performance is more comparable to its deposit performance with the bank in the top 21st percentile for deposits compared to its position in the top fourth percentile for mortgage lending and 13th percentile for small business lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in both geographies, and also stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is good.

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low-income geographies is excellent and the distribution in moderate-income geographies is poor. The proportion of loans substantially meets the proportion of businesses in low-income geographies, and is weaker in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was stronger than the aggregate distribution of loans in those geographies, and weaker than the distribution of loans in moderate-income geographies.

- Performance in the 2017 evaluation period is stronger than the bank's performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of small loans to businesses in both low- and moderate-income geographies substantially meets the proportion of businesses in those geographies. The bank's excellent performance had an impact on our evaluation of overall lending performance because performance, though evaluated over a significantly shorter period of time contained 73.4 percent of the lending volume in the AA that occurred during the entire 2014-2016 period.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is excellent.

- The distribution of the bank's home mortgage lending during the 2014–2016 evaluation period is excellent. The proportion of loans substantially meets the proportion of low- and moderate-income families, and stronger than the aggregate distribution of loans to those borrowers. Performance in the 2017 evaluation period is consistent with the overall excellent performance..

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The significant majority (94.3 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans was near to the proportion of small businesses and significantly exceeded the aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Community Development Lending

Refer to Table 1 in the Allentown MMSA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all

community development loans, including multifamily loans that also qualify as community development loans.

The bank's level of CD lending is excellent and has a significantly positive impact on lending performance in the AA. During the evaluation period, the bank originated 12 loans totaling \$6.8 million representing 12.2 percent of allocated tier one capital. CD loans originated by the bank were effective in helping address community credit needs. The majority of the loans promote the development and retention of affordable housing. The bank also originated loans supporting community revitalization and stabilization and organizations providing community services to LMI individuals and families. Specific examples of TDBNA's CD loans include:

- A renewed \$2.4 million mortgage loan originated for affordable rental housing providing independent senior living. All of the residents for this project are LMI individuals or families;
- A \$700 thousand mortgage loan originated for the purchase of a 41-unit senior apartment building. All of the units in the building are designated for affordable housing; and
- A \$2 million line of credit to support revitalization or stabilization of LMI areas through loans provided by a local Community Development Financial Institution (CDFI).

INVESTMENT TEST

Refer to Table 14 in the Allentown MMSA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 94 qualified investments totaling \$10.5 million. Additionally, five prior period investments totaling \$21.1 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 56.9 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made one Small Business Investment Company (SBIC) investment of \$2.3 million, one state tax credit investment of \$100 thousand, and 34 mortgage-backed security investments totaling \$7.8 million. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that provide affordable housing or other community service needs for LMI individuals and families such as financial literacy and education, homeownership classes, asset building education, and food or shelter.

Examples of qualified investments in this AA include:

- A \$30 thousand grant to an organization that provides LMI individuals and families with a continuum of coordinated financial counseling services in one location. The

organization's housing counseling program is HUD and Pennsylvania Housing Agency (PHFA)-certified and is the only program in the Lehigh Valley that offers comprehensive homeownership counseling, including a first-time home buyers program.

SERVICE TEST

Retail Banking Services

Refer to Table 15 in the Allentown MMSA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is good.

- Delivery systems are accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. During the evaluation period the bank had a limited presence in the AA with eight branches. While the bank did not have any branches or ATMs in low-income areas, it had an adequate number of branches and ATMs, in moderate-income areas compared to the population distribution.
- Additionally, the bank operated two branches in urban middle-income areas that were in the same neighborhood as LMI geographies. One of these branches was directly adjacent to an LMI geography. The other branch was along public transit lines or in a central business district that serves the entire community. These branches helped to expand access to bank products and services to these LMI geographies.
- The 2015 US Census ACS update had an impact on the geographic distribution of branches within the AA due to the redesignation of the income level of the geographies, not due to a change in the branch physical location. Specifically, the geography income category of the bank's one branch in a low-income CT changed to a moderate-income CT.
- The bank did not have any branch openings or closings during the evaluation period.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is good.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities. During the

evaluation period, 22 bank employees either provided financial literacy training to LMI individuals or small business owners and/or held board or committee positions with qualifying organizations. These employees account for nearly one quarter of the bank's employees in the AA.

- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 49 financial education events totaling 120 hours. Nineteen of these events were homebuyer, 15 were financial literacy, and 15 were small business classes. A total of 1,570 participants attended these events, including 1,398 individuals and 172 small business owners. These events address an identified CD need in the area, namely financial literacy and homeownership.

Boston-Cambridge-Newton, MA-NH MMSA

CRA rating for the Boston-Cambridge-Newton, MA-NH MMSA²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is good, based upon excellent home mortgage lending and good small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage lending and small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Boston-Cambridge-Newton, MA-NH MMSA

TDBNA's operations in the Boston-Cambridge-Newton MA-NH MMSA (Boston MMSA) were assessed at the MMSA level. The Boston MMSA AA consists of the following three MDs: Cambridge-Newton-Framingham, MA; Boston, MA; and Rockingham County-Strafford County, NH. TDBNA has approximately \$10.6 billion in deposits within this assessment area representing 7.2 percent of the bank's adjusted total domestic retail deposits. As of June 30, 2017, TDBNA ranked fifth with a deposit market share of 3.7 percent. Major banking competitors include State Street Bank and Trust Company, Bank of America, N.A., Citizen's Bank N.A., and Santander Bank N.A. with deposit market shares of 26.1 percent, 22.1 percent, 11.9 percent, and 5.0 percent, respectively. Banking competition is strong with 131 FDIC-insured depository institutions in the Boston MMSA. TDBNA has an established presence in

² This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

the MMSA with 105 branches and 175 deposit-taking ATMs. During the evaluation period, TDBNA made 7.1 percent of their HMDA loans and 5.8 percent of their small business loans within the MMSA.

Refer to the community profile for the Boston MMSA in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Boston MMSA

TDBNA's performance in the Boston MMSA was assessed at the MMSA level.

Five community contacts were performed in the MMSA related to this evaluation. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN BOSTON MMSA

LENDING TEST

Lending Activity

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares and rankings in mortgage loans and small loans to businesses are weaker than the bank's market share and ranking in deposits. The Boston MMSA represents a primary market for the bank with a significant branch presence in the market. TDBNA is one of the largest depository institutions in the Boston MMSA. Although the bank has a significant presence within the market, strong competition for deposits and loans and concentrations of loans and deposits held by a few large competitors has created constraints for the bank in achieving higher volumes of deposits and high volumes of loans.

TDBNA has a deposit market share of 3.7 percent, resulting in a market ranking of fifth out of 131 deposit-taking institutions. The bank's market ranking places it within the third percentile of depository institutions. Including TDBNA, the five largest institutions, based upon deposit market share, hold 68.0 percent of the deposit market.

The bank has a market share of 1.0 percent for mortgage lending and is the 22nd-ranked lender out of 680 lenders in the MMSA. The market is highly competitive and consists of national and local lenders, including national megabanks. The five largest mortgage lenders have captured 19.0 percent of the market. Comparing the bank's ranking to the number of lenders, TDBNA is in the third percentile of all mortgage lenders in the MMSA.

The bank has a market share of 2.1 percent for small business lending and is the 12th-ranked lender out of 189 lenders. The market is also very competitive and consists of national and local lenders of varying size. It also includes large issuers of small business credit cards. The five largest lenders have captured 63.0 percent of the market for small loans to businesses. Comparing TDBNA's ranking for small business lending to the number of lenders in the MMSA, the bank is in the sixth percentile for small business lenders.

Although lending market shares and rankings are weaker than the bank's deposit market share and ranking, comparison of the bank's percentile ranking within the respective markets provides a more accurate assessment of the bank's performance relative to the level and nature of its competition. The bank's lending performance is more comparable to its deposit performance with the bank in the third percentile for deposits compared to its position in the third percentile for mortgage lending and sixth percentile for small business lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in both geographies, and equal to the aggregate distribution of loans in low-income geographies and stronger than the aggregate distribution in moderate-income geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is good.

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low-income geographies is poor and distribution in moderate-income geographies is excellent. The proportion of loans was weaker than the proportion of businesses in low-income geographies and stronger in moderate-income geographies. The distribution of loans was weaker than the aggregate distribution in low-income geographies, and stronger in moderate-income geographies.
- The bank's performance in the 2017 evaluation period is stronger than performance in the 2014-2016 evaluation period and considered excellent. The 2017 performance is stronger than performance in the prior period because the distribution of small loans to businesses was stronger in low-income geographies compared to the prior period. The bank's stronger performance had minimal impact on our evaluation of the bank's

geographic distribution of small loans to businesses performance because it represents a significantly shorter evaluation period.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good.

- The distribution of the bank's home mortgage lending during the 2014–2016 evaluation period is good. The proportion of loans was weaker than the proportion of low-income families and significantly stronger than the proportion of moderate-income families. The proportion of loans was significantly stronger than the aggregate distribution of loans to both low- and moderate-income borrowers. Performance in the 2017 evaluation period is consistent with the overall good performance..

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was weaker than the proportion of small businesses, but stronger than the aggregate distribution of loans to those businesses. The bank is addressing an identified need in the community for smaller loans to businesses by making a significant majority (93.6 percent) of its business loans for \$100 thousand or less.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans is near to the proportion of small businesses and significantly exceeded the aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Community Development Lending

Refer to Table 1 in the Boston MMSA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

TDBNA's level of CD lending in the MMSA is excellent, and had a significantly positive impact on lending performance. During the evaluation period, the bank originated 79 loans totaling

\$258.7 million representing 24.8 percent of allocated tier one capital. The bank's CD lending was very effective in helping address community credit needs. The majority of the bank's lending promoted the development and retention of affordable housing. The bank also originated loans supporting community economic development and stabilization and revitalization and organizations providing community services to LMI individuals and families. Specific examples of the bank's CD loans include:

- A \$51 million construction and rehabilitation bridge loan to refinance and renovate a 380-unit apartment building. A substantial majority, 378 of the 380 units, are designated as Section 8 housing;
- An \$11 million loan for the construction of an apartment building providing 58-units of affordable housing;
- A \$2.9 million loan for the construction of a commercial building to be leased to an organization providing primary medical care to LMI patients with severe physical disabilities. The majority of the organization's patients qualify for Medicaid;
- Renewal of an \$8 million working capital line of credit to an organization providing community-based care to children, youth, and adults with emotional and/or behavioral problems. The majority of the patients are LMI; and
- A \$5.6 million loan to fund tenant improvements as part of a redevelopment project. The tenant is a small business incubator. The bank is also investing in state and historical tax credits supporting the project.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the Boston MMSA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TDBNA has an excellent level of qualified investments. The opportunities to invest are numerous as the greater Boston area is served by numerous CDFIs, Community Development Corporations (CDCs), and Community Development Entities. However, the market for these investments is competitive. During the evaluation period, TDBNA originated 406 qualified investments totaling \$154.7 million. Additionally, 61 prior period investments totaling \$102.7 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 24.7 percent of tier one capital allocated to this AA. TDBNA also has \$1.5 million in unfunded commitments.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made 13 Low-Income Housing Tax Credit (LIHTC) investments totaling \$102 million, three SBIC investments totaling \$5.6 million, and 30 mortgage-backed-securities totaling \$36.5 million. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in

the AA. A majority of the dollar volume of grants were to organizations that provide job training, affordable housing, or other community service needs for LMI individuals and families such as financial literacy and education, homeownership classes, and asset building education.

Examples of qualified investments in this AA include the following investments:

- A total of \$16 million in LIHTC equity to fund the rehabilitation of 64 units of affordable housing in Salem, Massachusetts. All of the units are restricted to residents with income at or below 60 percent of the Area Median Income (AMI). Seven units are set aside for formerly homeless tenants;
- A \$10 million of LIHTC equity for the construction of 58 units of affordable housing for low-income individuals and families;
- A \$9.2 million of LIHTC equity to fund the preservation and renovation of 145 units of affordable housing for seniors in Lynn, Massachusetts. The property participates in HUD's new Rental Assistance Demonstration Program (RAD), and all units are under a Section 8 platform with a long term contract that must be renewed. This will ensure that the units remain permanently affordable to low-income households;
- A \$125 thousand housing grant to a local neighborhood development corporation. The grant will help advance two projects that will create and preserve 248 affordable rental units for low-income Boston families. One project will create 47 new affordable homes in Jamaica Plain, and the other project will renovate and preserve 201 units of affordable housing in 20 buildings in Roxbury and Dorchester;
- Grants totaling \$45 thousand to a CDC that provides homeownership training, workforce and educational development, income support services, and financial coaching; and
- Grants totaling \$15 thousand to a local nonprofit organization that provides adult education and job training programs to LMI individuals in the area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the Boston MMSA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had a sufficient number of branches and ATMs in LMI areas compared to the population distribution.
- Additionally, the bank operated 11 branches in urban middle-income areas and three in upper-income areas that were in the same neighborhood as LMI geographies. Nine of these branches were directly adjacent to an LMI geography. The remaining five branches were along public transit lines or in central business districts that serve the entire community. These branches helped to expand access to bank products and services to these LMI geographies.
- The opening and closing of branches had a limited impact on the delivery of service across the community. As evidenced by the table, no branches were opened or closed in LMI geographies. All branch closures were located in upper-income geographies. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is excellent.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 115 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 273 financial education events totaling 1,104 hours. One hundred thirteen of these events were homebuyer, 39 were financial literacy, and 121 were small business classes. A total of 4,028 participants attended these events, including 2,572 individuals and 1,456 small business owners. These events address an identified CD need in the area, namely expanding access to financial education.

- During the evaluation period, bank employees provided over 600 hours in assistance to 26 qualifying organizations in the AA. This assistance was provided through board or committee membership, or volunteering technical expertise.

New York-Newark-Jersey City, NY-NJ-PA MMSA

CRA rating for the New York-Newark-Jersey City, NY-NJ-PA MMSA³: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending activity that is considered good.
- TDBNA's distribution of loans among geographies of different income levels is good, based upon excellent home mortgage lending and adequate small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon adequate home mortgage lending and good small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are accessible to geographies and individuals of different income levels in the AA. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in New York-Newark-Jersey City, NY-NJ-PA MMSA

TDBNA's operations in the New York-Newark-Jersey City, NY-NJ-PA MMSA (New York MMSA) were assessed at the MMSA level. The New York MMSA AA consists of the following four MDs: Newark, NJ-PA; Nassau County-Suffolk County, NY; Dutchess County-Putnam County, NY; and New York-Jersey City-White Plains, NY-NJ. TDBNA has approximately \$58.5 billion in deposits within this assessment area representing 39.7 percent of the bank's adjusted total domestic retail deposits. As of June 30, 2017, TDBNA ranked seventh with a deposit market share of 3.4 percent. Major banking competitors include JPMorgan Chase Bank, Bank of America, Citibank, and HSBC with deposit market shares of 32.9 percent, 6.9 percent, 6.5 percent, and 6.0 percent, respectively. Banking competition is very strong with 210 FDIC-insured depository institutions in the New York MMSA. TDBNA has a relatively

³ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

large presence in the MMSA with 409 branches and 817 deposit-taking ATMs. During the evaluation period, TDBNA made 25.4 percent of their HMDA loans and 46.0 percent of their small business loans within the MMSA.

Refer to the community profile for the New York MMSA in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New York MMSA

TDBNA's performance in the New York MMSA was assessed at the MMSA level.

Six community contacts were performed in the MMSA related to this evaluation. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK MMSA

LENDING TEST

Lending Activity

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is good. The bank originated a significant volume of loans in the MMSA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares in mortgage loans and small loans to businesses are weaker than its market share for deposits, but the market rankings for lending are comparable with the ranking for deposits. The New York MMSA represents a primary market for the bank with a significant branch presence in the market. The bank is one of the largest depository institutions in the New York MMSA. Although TDBNA has a significant presence within the market, there is strong competition within the MMSA for deposits and loans and concentrations of loans and deposits are held by a few large competitors. These conditions within the MMSA have created constraints for the bank in achieving higher volumes of deposits and high volumes of loans.

TDBNA has a deposit market share of 3.4 percent, resulting in a market ranking of seventh out of 210 deposit-taking institutions. The bank's market ranking places it within the third percentile of depository institutions. The five largest institutions, based upon deposit market share, hold 58.0 percent of the deposit market.

The bank has a market share of 2.1 percent for mortgage lending and is the eighth-ranked lender out of 868 lenders in the MMSA. The market is highly competitive and consists of national and local lenders, including national megabanks. The five largest mortgage lenders

have captured 28.0 percent of the market. Comparing the bank's ranking to the number of lenders, TDBNA is in the first percentile of all mortgage lenders in the MMSA.

The bank has a market share of 2.2 percent for small business lending and is the ninth-ranked lender out of 279 lenders. The market is very competitive and consists of national and local lenders of differing sizes. It also includes large issuers of small business credit cards. The five largest lenders have captured 73.0 percent of the market for small loans to businesses. Comparing TDBNA's ranking for small business lending to the number of lenders in the MMSA, the bank is in the third percentile for small business lenders.

Although lending market shares are weaker than the bank's deposit market share, the market rankings for home mortgage and small business lending are comparable to the bank's deposit market ranking. A more accurate assessment of the bank's performance relative to the level and nature of its competition is comparing the bank's percentile ranking within the respective markets. The bank's lending performance is more comparable to its deposit performance with the bank in the third percentile for deposits compared to its position in the first percentile for mortgage lending and third percentile for small business lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Tables O and 5 and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in both geographies, and also near to the aggregate distribution in low-income and stronger than the aggregate distribution of loans in moderate-income geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.
- During the 2014-2016 evaluation period, the distribution of multifamily loans in both low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in both geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is adequate.

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low-income geographies is adequate and distribution in moderate-income geographies is good. The proportion of loans was somewhat weaker than the proportion of businesses in low-income geographies and near to the proportion of businesses in

moderate-income geographies. The proportion of loans was weaker than the aggregate distribution of loans in low-income geographies, and near to the aggregate distribution in moderate-income geographies.

- The bank's performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered good. Performance in the later evaluation period is stronger because the proportion of loans was near to the proportion of businesses in low-income geographies. The bank's stronger performance had minimal impact on our evaluation of the geographic distribution of small loans to businesses because it represents a significantly shorter evaluation period.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is adequate.

- The distribution of the bank's home mortgage lending during the 2014–2016 evaluation period is adequate. The proportion of loans was significantly weaker than the proportion of low-income families, and near to the proportion of moderate-income families. The proportion of loans was significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. The 2016 median single-family housing value for the MMSA in 2016 was approximately \$389 thousand. The high cost of living associated with this area continues to make home ownership difficult. The 2016 FFIEC adjusted median family income for this MMSA is approximately \$92 thousand; however, there are significant disparities in the income levels of the four MDs within the MMSA ranging from \$72.6 thousand in the New York-Jersey City-White Plains, NY-NJ MD to \$106.2 thousand in the Nassau County-Suffolk County, NY MD. These disparities are also reflected in the poverty levels. Per the "New York State Annual Poverty Report" for 2017, the poverty levels found within the counties of the New York-Jersey City-White Plains, NY-NJ MD are among the highest in the state of New York, with Bronx County having the highest poverty level (30.7 percent) and Kings County the second highest (23.2 percent). Because of the disparity between incomes and area housing costs, LMI families face significant challenges to purchase or rent affordable homes in the AA.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period, and considered good. Performance is stronger because the proportion of loans was stronger than the proportion of moderate-income families. The bank's good performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was weaker than the proportion of small businesses, but was stronger than the aggregate distribution of loans to those businesses. The significant majority (95.7 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans approximated the proportion of small businesses and was significantly stronger than the aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Community Development Lending

Refer to Table 1 in the New York MMSA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. (Table 5 does not separately list community development loans).

The bank's level of CD lending in the New York MMSA is excellent, and has a significantly positive impact on lending performance in the AA. During the evaluation period, the bank originated 448 loans totaling \$1.7 billion representing 29.4 percent of allocated tier one capital. TDBNA's CD lending was very effective in helping address community credit needs. The majority of the bank's lending supported organizations providing community services to LMI individuals and families. A significant amount of the bank's CD lending supported the development and retention of affordable housing. Other loans supported community economic development, stabilization, and revitalization. Specific examples of the bank's CD loans include:

- A \$73.5 million loan originated to refinance a mortgage loan for rehabilitation and renovation of a nursing home with over 50 percent of the residents Medicaid eligible;
- A \$14 million term loan to finance the acquisition of an apartment building with 180 units of affordable housing;
- An \$11.7 million loan for the construction of a five-story building with 47 of the 87 units for LMI individuals or families;

- Renewal of an \$8 million working capital line of credit to an organization providing social services to children and adults with disabilities. Medicaid provides 75 percent of the funding for the organization; and
- A \$4.8 million loan for the purchase of an industrial warehouse located within an Urban Enterprise Zone.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the New York MMSA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 1,767 qualified investments totaling \$823.7 million. Additionally, 91 prior period investments totaling \$411.4 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 21.3 percent of tier one capital allocated to this AA. TDBNA also has \$6 million in unfunded commitments.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made 35 LIHTC investments, 13 SBIC investments, five state tax credit investments, one Urban Transit Hub Tax Credit (UTHTC) investment, and 320 mortgage-backed security pool investments. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing for LMI individuals or provide community services for LMI individuals such as financial literacy and education, homeownership classes, asset building, and food and shelter.

Examples of qualified investments in this AA include:

- TDBNA provided \$34.6 million in LIHTC equity to fund the construction of an eight story residential apartment building in the Bronx, New York. The new residential building will include 168 units of affordable housing for seniors with 51 units set aside for formerly homeless tenants. All of the units are restricted to residents with income at or below 60 percent of the AMI, and all of the units will benefit from a project-based Section 8 rental assistance contract, allowing tenants to pay only 30 percent of their income for rent;
- TDBNA provided \$5.7 million in LIHTC equity to fund the construction of a 30-unit affordable housing project. Of the 30 units, 22 are set aside for seniors aged 55 or older with income at or below 60 percent of the AMI, and eight units are set aside for formerly homeless and/or disabled veterans. Financing sources included LIHTC, a community development block grant, and permanent financing from New Jersey Housing and Mortgage Finance;

- TDBNA provided \$6.0 million in New Jersey Economic Recover and Growth (NJ ERG) equity to fund a multifamily affordable housing project in Newark, New Jersey. The NJ ERG credit program is a direct outgrowth of the UTHTC program, but designed to be a stand-alone state tax credit that can be used by the developer or monetized through the sale of the credit certificates. TDBNA was the first bank approached by the state to participate in the program. NJ ERG specifically targets multifamily housing projects in urban communities. This project provided funding for 89 units of affordable housing for families;
- A \$125 thousand grant to a nonprofit that provides housing and services to victims of domestic violence and their children. The organization is committed to increasing the housing options for domestic violence survivors by building affordable housing and improving their access to existing housing resources. TDBNA's grant provided funding that helped to turn an under-utilized site in the Bronx into an eight story, 42-unit affordable housing development with 23 units for homeless domestic violence survivors and their children coming from New York City Human Resources Administration domestic violence shelters. The remaining units are for low-income households from the community;
- Grants totaling \$60 thousand to a nonprofit organization that provides classes in basic literacy, pre-General Education Development (GED), English as a Second Language (ESL), computer training, and workplace readiness to women who live in poverty;
- Grants totaling \$480 thousand to a nonprofit organization that promotes financial literacy, wealth creation, asset preservation, and affordable housing opportunities for vulnerable populations across the state of New Jersey, including LMI families, minorities, women, seniors, immigrants with limited English proficiency, veterans, and people with disabilities. The funds supported financial literacy, HUD-certified housing and foreclosure counseling services, first-time homebuyer education, free tax preparation, and counselor-assisted benefits screening and healthcare enrollment assistance;
- Grants totaling approximately \$861 thousand to a nonprofit lending network that provides loans and financial education to small business owners along the East Coast. The grants supported programs that offered financial counseling, micro lending, and business development services to small business owners and assisted them in learning critical skills for business survival, making more informed financial and credit decisions, increasing revenue, and creating or sustaining jobs in their communities; and
- Grants totaling \$130 thousand to a nonprofit organization that provides food and services for people who are hungry and in need. The organization is the largest hunger relief organization on Long Island.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the New York MMSA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is good.

- Delivery systems are accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had an adequate number of branches and ATMs, as reflected in Table 15, in LMI areas compared to the population distribution.
- Additionally, the bank operated 35 branches in urban middle-income areas and 15 in upper-income areas that were in the same neighborhood as LMI geographies. Several of these branches were directly adjacent to (across the street from) an LMI geography. The remaining branches were along public transit lines or in central business districts that serve the entire community. These branches helped to expand access to bank products and services to these LMI geographies.
- The opening and closing of branches, reflected in Table 15, had a significant impact on the delivery of service across the community, particularly in expanding access to bank product and services in LMI geographies. As evidenced by the table, the bank had a net increase of 24 branches in the AA, including three branch openings in low-income geographies and eight branch openings in moderate-income geographies. All branch closures were located in middle- and upper-income geographies. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is excellent.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 459 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.

- During the evaluation period, bank employees provided over 4 thousand hours in assistance to 129 qualifying organizations in the AA. This assistance was provided through board or committee membership, or volunteering technical expertise. Providing pro bono or volunteer services was an identified CD need in the AA.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 1,109 financial education events totaling 3,231 hours. Four hundred sixty-one of these events were homebuyer, 206 were financial literacy, and 442 were small business classes. A total of 21,576 participants attended these events, including 12,436 individuals and 9,140 small business owners.

Philadelphia-Camden-Wilmington, PA-NJ-DE MMSA

**CRA rating for the Philadelphia-Camden-Wilmington, PA-NJ-DE MMSA⁴:
High Satisfactory**

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank's level of lending activity is good.
- TDBNA's distribution of loans among geographies of different income levels is adequate, based upon good home mortgage lending and adequate small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage lending and good small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are accessible to geographies and individuals of different income levels in the AA. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Philadelphia-Camden-Wilmington, PA-NJ-DE MMSA

TDBNA's operations in the Philadelphia-Camden-Wilmington, PA-NJ-DE MMSA (Philadelphia MMSA) were assessed at the MMSA level. The Philadelphia MMSA AA consists of the following four MDs: Philadelphia, PA; Wilmington, DE; Camden, NJ; and Montgomery County-Bucks County-Chester County, PA. TDBNA has approximately \$30.8 billion in deposits within this assessment area representing 20.9 percent of the bank's adjusted total domestic retail deposits. Per the FDIC, as of June 30, 2017, TDBNA ranked second with a deposit market share of 22.6 percent. However; as noted earlier in the Description of Institution section, the FDIC calculation is greatly inflated by the inclusion TD Ameritrade deposits. Approximately 31.2% of the deposits within the FDIC calculation are those of TD Ameritrade. A more

⁴ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

accurate assessment, adjusted for these affiliate sweep deposits, places TDBNA fifth with a deposit share of closer to 6.5 percent. Major banking competitors include Capital One, N.A., Chase Bank USA, N.A., and Wells Fargo Bank, N.A. with deposit market shares of 24.6 percent, 9.3 percent, and 7.0 percent, respectively. Banking competition is strong with 123 FDIC-insured depository institutions in the New York MMSA. TDBNA has an established presence in the MMSA with 142 branches and 259 deposit-taking ATMs. During the evaluation period, TDBNA made 12.6 percent of their HMDA loans and 13.1 percent of their small business loans within the MMSA.

Refer to the community profile for the Philadelphia MMSA in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Philadelphia MMSA

TDBNA's performance in the Philadelphia MMSA was assessed at the MMSA level.

Four community contacts were performed in the MMSA related to this evaluation. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PHILADELPHIA MMSA

LENDING TEST

Lending Activity

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is good. The bank originated a significant volume of loans in the MMSA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares and rankings for mortgage loans and small loans to businesses are weaker than its market share and ranking for deposits. The Philadelphia MMSA represents a primary market for the bank as it has a significant branch presence in the market. The bank is one of the largest depository institutions in the Philadelphia MMSA. Although TDBNA has a significant presence within the market, there is strong competition within the MMSA for deposits and loans and concentrations of loans and deposits are held by a few large competitors. These conditions within the MMSA have created constraints for the bank in achieving higher volumes of loans and additional deposit growth.

TDBNA has a deposit market share of 22.6 percent, resulting in a market ranking of second out of 123 deposit-taking institutions. The bank's market ranking places it within the first percentile of depository institutions. The five largest institutions, based upon deposit market share, hold 68.0 percent of the deposit market. However; as noted earlier, this figure is artificially inflated due to the inclusion of TD Ameritrade sweep-deposits.

The bank has a market share of 1.8 percent for mortgage lending and is the tenth-ranked lender out of 857 lenders in the MMSA. The market is highly competitive and consists of national and local lenders, including national megabanks. The five largest mortgage lenders have captured 21.0 percent of the market. Comparing the bank's ranking to the number of lenders, TDBNA is in the first percentile of all mortgage lenders in the MMSA.

The bank has a market share of 3.4 percent for small business lending and is the ninth-ranked lender out of 222 lenders. The market is very competitive and consists of national and local lenders of differing sizes. It also includes large issuers of small business credit cards. The five largest lenders have captured 55.0 percent of the market for small loans to businesses. Comparing TDBNA's ranking for small business lending to the number of lenders in the MMSA, the bank is in the fourth percentile for small business lenders.

Mortgage and small business market shares and rankings are weaker than the bank's deposit market share and ranking. A more accurate assessment of the bank's performance relative to the level and nature of its competition is comparing the bank's percentile ranking within the respective markets. The bank's lending performance is more comparable to its deposit performance with the bank in the first percentile for deposits compared to its position in the first percentile for mortgage lending and fourth percentile for small business lending. Once adjusting for the inflated deposit market share caused by the TD Ameritrade deposits, lending performance further improves.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Tables O and 5 and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is good.

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in low-income geographies is adequate and distribution in moderate-income geographies is excellent. The proportion of loans was somewhat weaker than the proportion of owner-occupied housing units in low-income geographies and substantially meets the proportion of housing units in moderate-income geographies. The bank's proportion of loans was stronger than the aggregate distribution of loans in both low- and moderate-income geographies.
- TDBNA's performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and is excellent. Performance is stronger because the proportion of lending in low- and moderate-income geographies is stronger than the proportion of housing units in those geographies. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.
- During the 2014-2016 evaluation period, the distribution of multifamily loans in low- and moderate-income geographies is adequate. The proportion of loans was stronger than

the proportion of owner-occupied housing units in low-income geographies and weaker than the proportion of housing units in moderate-income geographies. Performance in the 2017 evaluation period is consistent with the overall adequate performance..

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is adequate.

- During the 2014–2016 evaluation period, the distribution of small loans to businesses is poor in low-income geographies and adequate in moderate-income geographies. The proportion of loans was weaker than the proportion of businesses in low-income geographies and somewhat weaker than the proportion of businesses in moderate-income geographies. The bank's proportion of loans was somewhat weaker than the aggregate distribution of loans in low-income geographies and near to the distribution of loans in moderate-income geographies.
- The bank's performance in the 2017 evaluation period is stronger than the performance in the 2014-2016 period, and is considered good. Performance is stronger because the proportion of loans was near to the aggregate distribution of loans in low-income geographies. The bank's good performance had minimal impact on our evaluation of overall lending performance because the performance was evaluated over a significantly shorter period of time.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Tables P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good.

- The distribution of the bank's home mortgage lending during the 2014–2016 evaluation period is good. The proportion of loans was somewhat weaker than the proportion of low-income families and significantly stronger than the proportion of moderate-income families, and significantly stronger than the aggregate distribution of loans to both low- and moderate-income borrowers.
- The bank's performance in the 2017 evaluation period is stronger than the performance in the 2014-2016 period, and is considered excellent. Performance is stronger because the proportion of loans was stronger than the proportion of low- and moderate-income families and significantly stronger than the aggregate distribution of loans to both low- and moderate-income borrowers. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because the performance was evaluated over a significantly shorter period of time.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

- During the 2014–2016 evaluation period, the proportion of loans was weaker than the proportion of small businesses, but was stronger than the aggregate distribution of loans to those businesses. The significant majority (93.1 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans was comparable to the proportion of small businesses and significantly stronger than the aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Community Development Lending

Refer to Table 1 in the Philadelphia MMSA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. (Table 5 does not separately list community development loans).

The bank's CD lending in the MMSA is excellent, and has a significantly positive impact on lending performance in the AA. During the evaluation period, the bank originated 127 loans totaling \$936.3 million. The bank's CD loans represent 30.7 percent of allocated tier one capital. The bank's CD lending was very effective in helping address community credit needs. The majority of the bank's CD loans supported organizations providing community services to LMI individuals and families. A large amount of the bank's CD lending supported the development and retention of affordable housing. Other loans supported community economic development, stabilization, and revitalization. Specific examples of the bank's CD loans include:

- Renewal of a syndicated line of credit for a national leader in Medicaid managed care and related businesses. TDBNA has a participation in the line of credit in the amount of \$24.5 million;
- Renewal of a \$5 million working capital line of credit to an organization providing services to individuals with developmental and intellectual disabilities and brain injuries. The majority of the individuals receiving services are LMI;

- A \$7 million construction loan for the development of 80 units of affordable rental housing; and
- A \$13.1 million short term loan to a local board of education to fund the district's payroll. The loan was to bridge the gap in capital due to the timing of the delivery of state financial aid.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the Philadelphia MMSA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 817 qualified investments totaling \$341.2 million. Additionally, 42 prior period investments totaling \$176.9 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 21.6 percent of tier one capital allocated to this AA. TDBNA also has \$5.8 million in unfunded commitments.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made 20 LIHTC investments, 10 SBIC investments, 12 state tax credit investments, two UHTC investments, and 138 mortgage-backed security pool investments. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, and asset building.

Examples of qualified investments in this AA include:

- TDBNA provided \$12.3 million in LIHTC equity to fund the construction of a 48-unit low-income housing development in Westampton, New Jersey. All units are barrier-free and restricted to families with income at or below 60 percent of the AMI. An additional \$6.6 million LIHTC investment was made to fund the development of the adjacent community building, which will be used by social services providers. The Division of Development Disabilities, through a contract with local service provider agencies, will provide case management services, linkages to health care services, skill development training, and on-call services to residents with developmental disabilities. Catholic Charities will provide case management services, mental health treatment and illness management, and recovery to residents who have mental illness;
- A \$12.4 million LIHTC investment to rehabilitate a vacant school into 37 units of affordable housing for families with income at or below 60 percent of the AMI. The renovation will reinstate the building as an anchor and landmark within the community

by repurposing the vacant, dilapidated building into affordable housing while retaining the historic and architectural value of the building;

- TDBNA provided \$2.4 million in LIHTC equity to fund the construction of a four-story affordable housing project in North Philadelphia, Pennsylvania. The project will provide 30 units of affordable housing for residents with income at or below 60 percent of the AMI. Twenty-five of the units are subsidized by Section 8 and reserved for young adults who are homeless, formerly homeless, at risk of homelessness, including those aged out of foster care, special needs individuals, and LGBTQ individuals. This development is the first of its kind in the state;
- TDBNA provided \$7.9 million in LIHTC equity to fund the adaptive reuse of a three-story former warehouse in Philadelphia, Pennsylvania. The property now provides 26 units of affordable housing for families with income at or below 60 percent of the AMI. The units are marketed with a preference to veterans, and six of the units are set-aside for homeless individuals and families. Social and employment services are provided at an office immediately adjacent to the project. TDBNA also provided a \$100 thousand grant for this project;
- TDBNA provided \$13.4 million in LIHTC equity to fund the adaptive reuse of a five-story Orinoka Mills textile factory, which was constructed in 1920 and has been vacant and abandoned since 1980. The project will provide 51 units of affordable housing for families with income at or below 60 percent of the AMI as well as 6,700 square feet of commercial space. The project revitalizes the area and provides a positive impact on the surrounding area. TDBNA also provided a \$100 thousand grant for this project;
- TDBNA provided \$13 million in LIHTC equity to fund the substantial rehabilitation and adaptive reuse of the 100-year old Leibowitz Shirt Factory located in Pottstown, Pennsylvania. The project provides 43 units of affordable housing and four thousand square feet of commercial space for local artists. The project was developed to address a large vacant property in a stable, low-income neighborhood and to expand the supply of affordable housing. The building had been vacant for over 10 years and is located on a prominent corner four blocks away from High Street, which is Pottstown's economic and cultural hub. This is the first general-occupancy LIHTC project in the area in 25 years; and
- Grants totaling \$50 thousand to a nonprofit organization that provides market or below market interest rate business loans and technical assistance to small businesses. The organization is seeking to expand its financing programs and become an SBA Community Advantage lender. This will enable the organization to offer a continuum of funding for microenterprise and other small businesses and support larger financing needs of businesses in their target market. The grants will assist the organization in funding the activities related to establishing, implementing, and promoting the program.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the Philadelphia MMSA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is good.

- Delivery systems are accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had an adequate number of branches and ATMs, as reflected in Table 15, in LMI areas compared to the population distribution.
- Additionally, the bank operated 17 branches in urban middle-income areas and two in upper-income areas that were in the same neighborhood as moderate-income geographies. Eleven of these branches were directly adjacent to an LMI geography. The remaining eight branches were along public transit lines or in central business districts that serve the entire community. These branches helped to expand access to bank products and services to these moderate-income geographies.
- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, one branch was opened in a low-income geography. All branch closures were located in middle-income geographies. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is excellent.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 284 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.

- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 441 financial education events totaling 1,310 hours. One hundred thirty-eight of these events were homebuyer, 162 were financial literacy, and 141 were small business classes. A total of 8,646 participants attended these events, including 6,515 individuals and 2,131 small business owners. These events addressed an identified CD need in the area, namely financial literacy and homeownership classes.
- In addition to financial education classes, bank employees provided nearly 2,400 hours in assistance to 86 qualifying organizations in the AA. This assistance was provided through board or committee membership, or volunteering technical expertise.

Providence-Warwick RI-MA MMSA

CRA rating for the Providence-Warwick RI-MA MMSA⁵: High Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is adequate, based upon excellent home mortgage lending and poor small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage lending and small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are accessible to geographies and individuals of different income levels in the AA. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Providence-Warwick RI-MA MMSA

TDBNA's operations in the Providence-Warwick RI-MA MMSA (Providence MMSA) were assessed at the MMSA level. The Providence MMSA AA is a portion of the full MMSA and is defined to include Bristol County and Providence County, RI in their entirety; the cities of Warwick and West Warwick, RI; and the cities of Attleboro, Mansfield, and North Attleboro, MA. TDBNA has approximately \$451 million in deposits within the assessment area representing 0.3 percent of the bank's adjusted total domestic retail deposits. As of June 30, 2017, TDBNA ranked fourteenth with a deposit market share of 1.2 percent. Major banking competitors include Citizen's Bank, N.A., Bank of America, N.A., Santander Bank, N.A., and The Washington Trust Company of Westerly with deposit market shares of 30.2 percent, 22.9 percent, 8.8 percent, and 7.3 percent, respectively. Banking competition is moderate with 30 FDIC-insured depository institutions in the Providence MMSA. TDBNA has a relatively small

⁵ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

presence in the MMSA with only nine branches and 17 deposit-taking ATMs, given its small scale presence, during the evaluation period, TDBNA made only 0.7 percent of their HMDA loans and 0.5 percent of their small business loans within the MMSA.

Refer to the community profile for the Providence MMSA in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Providence MMSA

TDBNA's performance in the Providence MMSA was assessed at the MMSA level.

Four community contacts were performed in the MMSA related to this evaluation. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PROVIDENCE MMSA

LENDING TEST

Lending Activity

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage loans and small loans to businesses are weaker than its market share and ranking for deposits. The bank has a limited branch network in the Providence MMSA and considers it to be a secondary market. There is strong competition within the MMSA for deposits and loans and a few large institutions have concentrations of loans and deposits. These conditions within the MMSA, combined with the bank's limited presence, have created constraints for the bank in achieving higher volumes of loans and additional deposit growth.

TDBNA has a deposit market share of 1.2 percent, resulting in a market ranking of 14th out of 30 deposit-taking institutions. The bank's market ranking places it within the 46th percentile of depository institutions. The five largest institutions, based upon deposit market share, hold 73.0 percent of the deposit market.

The bank has a market share of 0.5 percent for mortgage lending and is the 48th-ranked lender out of 491 lenders in the MMSA. The market is highly competitive and consists of national and local lenders, including national megabanks. The five largest mortgage lenders have captured 18.0 percent of the market. Comparing the bank's ranking to the number of lenders, TDBNA is in the ninth percentile of all mortgage lenders in the MMSA.

The bank has a market share of 0.8 percent for small business lending and is the 23rd-ranked lender out of 109 lenders. The market is very competitive and consists of national and local lenders of differing sizes. It also includes large issuers of small business credit cards. The five largest lenders have 53.0 percent of the market for small loans to businesses. Comparing TDBNA's ranking for small business lending to the number of lenders in the MMSA, the bank is in the 21st percentile for small business lenders.

Mortgage and small business market shares and rankings are weaker than the bank's deposit market share and ranking. Comparing the bank's percentile ranking within its respective markets is a more accurate assessment of the bank's performance relative to its competition. The bank's lending performance is more comparable to its deposit performance with the bank in the 46th percentile for deposits compared to its position in the ninth percentile for mortgage lending and 21st percentile for small business lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was significantly stronger than the proportion of owner-occupied housing units in both geographies, and was also significantly stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is poor.

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low-income geographies is very poor and the distribution in moderate-income geographies is poor. The proportion of loans was significantly below the proportion of businesses in low-income geographies, and below in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was significantly weaker than the aggregate distribution of loans in those geographies, and weaker than the aggregate distribution of loans in moderate-income geographies.
- Performance in the 2017 evaluation period is stronger than the bank's performance in the 2014-2016 period and considered adequate. Performance is stronger because the proportion of small loans to businesses in low-income geographies was somewhat weaker than the proportion of businesses in those geographies. The bank's adequate

performance had minimal impact on our evaluation of overall lending performance because this performance was evaluated over a significantly shorter period of time.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good.

- The proportion of the bank's home mortgage lending to low-income borrowers is adequate, and the proportion of lending compared to moderate-income borrowers is excellent. The proportion of loans was somewhat weaker than the proportion of low-income families, and significantly stronger than the proportion of moderate-income families. The bank's home mortgage lending is significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. Performance in the 2017 evaluation period is consistent with the overall good performance.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was somewhat weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The significant majority (94.2 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans exceeded the proportion of small businesses and exceeded the aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Community Development Lending

Refer to Table 1 in the Providence MMSA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

The bank's level of CD lending in the Providence MMSA is excellent, and has a significantly positive impact on lending performance in the AA. During the evaluation period, the bank originated five affordable housing loans totaling \$27.6 million representing 61.9 percent of allocated tier one capital. TDBNA's CD lending was very effective in helping address the community need for affordable housing. Examples of the bank's loans for affordable housing include:

- A \$12.5 million commercial real estate mortgage loan to a multifamily property providing 128 units of Section 8 housing;
- An \$8.3 million construction loan to finance the development of 40 units of affordable housing (LIHTC project); and
- A \$6.7 million construction loan for the development of 46 units of affordable rental housing (LIHTC project).

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the Providence MMSA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 81 qualified investments totaling \$13.8 million. Additionally, eight prior period investments totaling \$13.9 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 62.2 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made one LIHTC investment totaling \$9.7 million and seven mortgage-backed security pool investments totaling \$2.8 million. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, asset building, food, and shelter.

Examples of qualified investments in this AA include:

- TDBNA provided \$9.7 million in LIHTC equity to fund a scattered site affordable housing project that includes both new construction and substantial rehabilitation of existing buildings. The project creates 46 units of affordable housing for families with income at or below 60 percent of the AMI. Twenty-nine units are newly constructed;
- A \$100 thousand grant to a nonprofit CDC to support an affordable housing and revitalization program. The program's initiative is to increase the affordable housing

supply in the rural town of Burrillville, Rhode Island by 36.0 percent. The grant supports the development of 94 apartments as well as a neighborhood learning center for the projected 200 youth who will be living in the new housing. The project also includes village retail space and expansion space for the community health center in several existing blighted buildings;

- A \$10 thousand grant to a nonprofit CDC to support the homeownership center, which is a one-stop shop for education and financial planning programs. Families are prepared with workshops, expert speakers, and one-on-one coaching sessions so they have the knowledge and financial strength to make wise choices about their budget, credit, and housing options;
- TDBNA also provided grants totaling \$100 thousand to a nonprofit CDC to support an affordable housing project that will rehabilitate and preserve 51 units of supportive housing for chronically homeless individuals with mental health disabilities;
- A \$10 thousand grant to a nonprofit economic development corporation to support a small business development program that focuses on technical assistance and support services to the LMI community as well as minority and women-owned businesses; and
- Grants totaling approximately \$131 thousand to support a nonprofit organization that provides food to people in need and promotes long-term solutions to the problem of hunger.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the Providence MMSA section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is good.

- Delivery systems are accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. During the evaluation period the bank had a limited presence in the AA with nine branches. While the bank did not have any branches or ATMs in low-income areas, the distribution of branches and ATMs in moderate-income areas exceeds the distribution of population in those areas.

- Additionally, the bank operated one branch in an urban middle-income area and one in an upper-income area that were in the same neighborhood as moderate-income geographies. Both of these branches were directly adjacent to a moderate-income geography. These branches helped to expand access to bank products and services to these moderate-income geographies.
- The bank did not have any branch openings or closings during the evaluation period.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is adequate.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 29 bank employees either provided financial literacy training to LMI individuals or small business owners and/or held board or committee positions with qualifying organizations. These employees account for over one quarter of the bank's employees in the AA.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 46 financial education events totaling 109 hours. Twenty of these events were homebuyer, six were financial literacy, and 20 were small business classes. A total of 520 participants attended these events, including 240 individuals and 280 small business owners. These events address an identified CD need in the area, namely financial literacy classes for LMI individuals and small business owners.

Washington-Arlington-Alexandria, DC-MD-VA MMSA

CRA rating for the Washington-Arlington-Alexandria, DC-MD-VA MMSA⁶: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is excellent, based upon excellent home mortgage and small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage lending and small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Washington-Arlington-Alexandria, DC-MD-VA MMSA

TDBNA's operations in the Washington-Arlington-Alexandria, DC-MD-VA MMSA (Washington MMSA) were assessed at the MMSA level. The Washington MMSA AA consists of the complete MMSA, excluding Calvert, Charles, and Frederick Counties in Maryland; Clarke, Culpepper, Fauquier, Rappahannock, Spotsylvania, Stafford, and Warren counties in Virginia, and Fredericksburg City, VA. TDBNA has approximately \$3.2 billion in deposits within this assessment area representing 2.1 percent of the bank's adjusted total domestic retail deposits. As of June 30, 2017, TDBNA ranked twelfth with a deposit market share of 1.6 percent. Major banking competitors include E*Trade Bank, Bank of America, N.A., Wells Fargo Bank, N.A., and Capital One N.A. with deposit market shares of 16.8 percent, 13.3 percent, 13.1 percent,

⁶ This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

and 11.5 percent, respectively. Banking competition is strong with 81 FDIC-insured depository institutions in the Washington MMSA. TDBNA has an established presence in the MMSA with 50 branches and 74 deposit-taking ATMs. During the evaluation period, TDBNA made 5.0 percent of their HMDA loans and 2.8 percent of their small business loans within the MMSA.

Refer to the community profile for the Washington MMSA in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Washington MMSA

TDBNA's performance in the Washington MMSA was assessed at the MMSA level.

Four community contacts were performed in the MMSA related to this evaluation. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON MMSA

LENDING TEST

Lending Activity

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The market shares and rankings for TDBNA's mortgage lending and originating small loans to businesses are weaker than its deposit market share and ranking. The bank has the ninth largest branch network in the MMSA with 50 branches. There is strong competition within the MMSA for deposits and loans and large market shares are concentrated in limited numbers of institutions. These conditions within the MMSA, combined with the bank's relatively-limited presence in the market, have created significant challenges for the bank to achieve higher volumes of loans and additional deposit growth.

TDBNA has a deposit market share of 1.6 percent, resulting in a market ranking of 12th out of 81 deposit-taking institutions. The bank's market ranking places it within the 14th percentile of depository institutions. The five largest institutions, based upon deposit market share, hold 62.0 percent of the deposit market.

The bank has a market share of 0.4 percent for mortgage lending and is the 53rd-ranked lender out of 761 lenders in the MMSA. The market is highly competitive and consists of national and local lenders of varying sizes, including national megabanks. The five largest mortgage lenders have captured 18.0 percent of the market. Comparing the bank's ranking to the

number of mortgage lenders, TDBNA is in the sixth percentile of all mortgage lenders in the MMSA.

The bank has a market share of 0.5 percent for small business lending and is the 15th-ranked lender out of 195 lenders. The market is very competitive and consists of national and local lenders of different sizes. The market also includes national small business credit card issuers. The five largest lenders have captured 67.0 percent of the market for small loans to businesses. Comparing TDBNA's ranking for small business lending to the number of lenders in the MMSA, the bank is in the seventh percentile for small business lenders.

Mortgage and small business market shares and rankings are weaker than the bank's deposit market share and ranking. Comparing the bank's percentile ranking within its respective markets is a more accurate assessment of the bank's performance relative to its competition. The bank's lending performance is more comparable to its deposit base and the level and nature of competition in the MMSA with the bank in the 14th percentile for deposits compared to its position in the sixth percentile for mortgage lending and seventh percentile for small business lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in both geographies, and also stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is excellent.

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of businesses in both low- and moderate-income geographies, and stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Tables P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good.

- The distribution of the bank's home mortgage lending during the 2014–2016 evaluation period is good. The proportion of loans was weaker than the proportion of low-income families, but stronger than the proportion of moderate-income families, and significantly stronger than the aggregate distribution of loans to those borrowers. Performance in the 2017 evaluation period is consistent with the overall good performance.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The significant majority (95.1 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans was near to the proportion of small businesses and exceeded the aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Community Development Lending

Refer to Table 1 in the Washington MMSA section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

TDBNA's CD lending in the Washington MMSA is excellent, and has a significantly positive impact on lending performance in the AA. During the evaluation period, the bank originated 31 CD loans totaling \$75.2 million, representing 24.0 percent of allocated tier one capital. TDBNA's CD lending was very effective in helping address community credit needs. The bank originated a significant number of CD loans to support the development and retention of affordable housing in the AA. Other CD lending supported the revitalization and stabilization of LMI areas. One CD loan provided support to an organization providing community services to LMI individuals and families. Some examples of the bank's CD loans include:

- Bridge financing of \$13.2 million supporting the development of 150 units of affordable housing (LIHTC project);
- A \$6 million loan for the rehabilitation of three foreclosed and vacant properties into 36 units of affordable housing. The financing was also provided to bridge the LIHTC equity pay-ins (LIHTC project);
- An \$8.6 million construction loan to develop 82 units of independent living senior housing. All of the units will be income-qualified with 73 units for residents at or below 50 percent and nine units for residents at or below 30 percent of AMI, respectively (LIHTC project); and
- A \$4.2 million loan to refinance debt and capitalize improvements on a commercial property located in a low-income geography. The property was in an Enterprise Zone at the time of construction.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the Washington MMSA section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 258 qualified investments totaling \$78.2 million. Additionally, nine prior period investments totaling \$14.5 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 29.6 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. TDBNA made three LIHTC investments totaling \$49.1 million, 16 mortgage-backed security investments totaling \$14.8 million, and three SBIC investments totaling \$8.2 million. These investments are responsive to the affordable housing and small business credit needs identified in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, and asset building.

Examples of qualified investments in this AA include:

- TDBNA provided \$7.9 million in LIHTC equity to fund the redevelopment of three vacant three-story buildings that will provide 36 units of affordable housing within the Benning Road Corridor Redevelopment Framework Plan. Twelve units will serve as permanent supportive housing for families with income at or below 30 percent of the AMI. These units are subsidized by a project based Section 8 Housing Assistance Payments (HAP) contract and are set aside for formerly homeless families. Twenty-four units will provide housing for families with income at or below 60 percent of the AMI. The property was

designed to be “net-zero energy efficient” to reduce costs for the tenants and to serve as a model for similar multifamily housing;

- A \$27.9 million LIHTC investment in a housing development that provides 270 affordable rental units, of which, 54 units are restricted to residents with income at or below 50 percent of the AMI and the remaining units are restricted to residents with income at or below 60 percent of the AMI. This is the only LIHTC project in close proximity to the Fairfax County Government Center office buildings and nearby shopping and other public services;
- A \$765 thousand grant to support a program initiative that is designed to help small business owners expand their knowledge of business financing options and create a plan for financial success; and
- A \$125 thousand grant for the construction of a 72-unit rental apartment building for mixed-income seniors. Of the 72 units, 65 are reserved for seniors with income at or below 60 percent of the AMI. Amenities will include a multi-purpose room, computer lounge, fitness center, wellness room, library, and hospitality suite.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the Washington MMSA section of Appendix D for the facts and data used to evaluate the distribution of the bank’s branch delivery system, branch openings and closings, and distribution of the bank’s deposit-taking ATMs.

Based on the data in Table 15 and the following performance context considerations, we concluded the bank’s retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank’s branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank has a significant number of branches and ATMs, as reflected in Table 15, in LMI areas compared to the population distribution.
- Additionally, the bank operated five branches in urban middle-income areas and six in upper-income areas that were in the same neighborhood as LMI geographies. Three of these branches were directly adjacent to an LMI geography. The remaining eight branches were along public transit lines or in central business districts that serve the entire community. These branches helped to expand access to bank products and services to these LMI geographies.

- The opening and closing of branches, reflected in Table 15, had a relatively limited impact on the delivery of service across the community. As evidenced by the table, the bank had a net increase of nine branches in middle- and upper-income geographies in the AA. The two branch closures were located in upper-income geographies. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.
- The 2015 US Census ACS update had an impact on the geographic distribution of branches within the AA. Specifically, while the number of branches in moderate-income geographies remained the same at 11, the number of branches in low-income geographies changed from five to four. This change was due to the redesignation of the income level of the geographies, not due to a change in the branch physical location.

Community Development Services

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is excellent.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 129 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 221 financial education events totaling 679 hours. Eighty-six of these events were homebuyer, 51 were financial literacy, and 84 were small business classes. A total of 3,929 participants attended these events, including 2,254 individuals and 1,675 small business owners. These events address an identified CD need in the area, namely financial literacy classes.
- In addition to financial education classes, bank employees provided nearly 550 hours in assistance to 22 qualifying organizations in the AA. This assistance was provided through board or committee membership, or volunteering technical expertise.

State of Connecticut

CRA Rating for Connecticut⁷: Outstanding

The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is excellent, based upon excellent home mortgage and small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage and small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are accessible to geographies and individuals of different income levels. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the communities in which it operated.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Connecticut

TDBNA has delineated five AAs within the state of Connecticut. These include four MSAs and one non-MSA area; specifically: the complete MSAs of Bridgeport-Stamford-Norwalk; Hartford-West Hartford-East Hartford; and New Haven-Milford; the partial MSA of Norwich-New London (New London County, Towns of Colchester and Lebanon only); and the non-MSA areas of Litchfield County. TDBNA has approximately \$6.8 billion in deposits within the state representing 4.6 percent of adjusted total deposits. As of June 30, 2017, TDBNA ranked fifth in the state with a deposit market share of 5.2 percent. Major banking competitors include Bank of America, N.A., Webster Bank, N.A., People's Bank, and Well Fargo Bank, N.A., with deposit market shares of 22.8 percent, 13.3 percent, 12.9 percent, and 6.6 percent, respectively. Banking competition is strong with 62 FDIC-insured depository institutions in the

⁷ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

State of Connecticut. TDBNA has an established presence in the state with 67 branches and 83 deposit-taking ATMs. During the evaluation period, TDBNA made 4.6 percent of their HMDA loans and 4.1 percent of their small business loans within the state.

Refer to the community profiles for the state of Connecticut in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Connecticut

The Hartford-West Hartford-East Hartford and New Haven-Milford MSAs were selected for full scope reviews. The Hartford-West Hartford-East Hartford MSA (Hartford MSA AA) accounts for 42.6 percent of deposits; 35.8 percent of the branches; 38.9 percent of HMDA lending; and 34.0 percent of small business lending in the state; and New Haven-Milford MSA (New Haven MSA AA) accounts for 25.4 percent of deposits; 32.8 percent of the branches; 23.1 percent of HMDA lending; and 30.4 percent of small business lending in the state.

Five community contacts were performed in the state related to this evaluation; two in the Hartford MSA AA and three in the New Haven MSA AA. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CONNECTICUT

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

Hartford MSA AA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The market shares and rankings for TDBNA's mortgage lending and small business loans are weaker than its deposit market share and ranking. The bank is one of the largest institutions, based upon deposit market share, in the MSA. TDBNA has the fourth-largest share of the deposit market and the seventh-largest branch network. The deposit market is dominated by one institution, Bank of America, N.A., with 42.5 percent of the deposit market. One dominant institution in the market, combined with the remaining institutions competing in the market not held by Bank of America, creates a very competitive market for TDBNA and the other institutions.

TDBNA has a deposit market share of 6.4 percent, resulting in a market ranking of fourth out of 30 deposit-taking institutions. The bank's market ranking places it in the 13th percentile of depository institutions. The five largest institutions, based upon deposit market share, hold 71.0 percent of the deposit market.

The bank has a market share of 1.4 percent for mortgage lending and is the 18th-ranked lender out of 479 lenders in the MSA. The market for loans is very competitive and the competition consists of local and national lenders of differing sizes, including megabanks. The five largest lenders hold 19.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the third percentile of all mortgage lenders in the MSA.

TDBNA has 2.4 percent of the small business lending market and is the 11th-ranked lender out of 122 lenders. The market consists of national and local lenders of different sizes, including megabanks and national issuers of small business credit cards. Competition for loans is very strong in the MSA. The five largest small business lenders have captured 59.0 percent of the market. Comparing TDBNA's market ranking for small business lending to the number of lenders in the market, the bank is in the ninth percentile for small business lenders.

Mortgage and small business market shares and rankings are weaker than the bank's deposit market share and ranking. Comparing the bank's percentile rankings within its respective markets is a more accurate assessment of the bank's performance relative to the volume and nature of its competition. The bank's lending performance is more comparable to its deposit base and the level and nature of competition in the MSA with the bank in the 13th percentile for deposits compared to its position in the third percentile for mortgage lending and ninth percentile for small business lending.

New Haven MSA AA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The market shares and rankings for TDBNA's mortgage lending and small business loans are weaker than its deposit market share and ranking. The bank is the sixth largest institution in the market, based upon deposit market share. The bank also has the sixth-largest branch network. As with the Hartford MSA, the New Haven MSA has one dominant institution, Webster Bank, N.A., with 37.5 percent of the deposit market. The New Haven MSA is similar to the Hartford market, with one dominant institution in the market, combined with the remaining institutions competing in the market not held by Webster Bank, creating a very competitive market for TDBNA and the other institutions.

TDBNA has a deposit market share of 6.2 percent, resulting in a market ranking of sixth out of 25 deposit-taking institutions. The bank's market ranking places it in the 24th percentile of depository institutions. The five largest institutions, based upon deposit market share, hold 75.0 percent of the deposit market.

The bank has 1.5 percent of the mortgage lending market and is the 18th-ranked lender out of 433 lenders in the MSA. The market for loans is very competitive and the competition consists of national and local lenders of varying sizes, including megabanks. The five largest lenders have captured 21.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the fourth percentile of mortgage lenders in the MSA.

The bank has a market share of 2.2 percent for small business lending and is the 11th-ranked lender out of 116 lenders. Although the market is geographically small and consists of a relatively-small number of lenders, it consists of national and local lenders of different sizes. It also includes national issuers of small business credit cards. Competition for loans is very strong in the MSA. The five largest lenders have captured 64.0 percent of the small business lending market. Comparing TDBNA's small business lending market ranking to the number of lenders in the market, the bank is in the ninth percentile for small business lenders.

Mortgage and small business market shares and rankings are weaker than the bank's deposit market share and ranking. Comparing the bank's percentile rankings within its respective markets is a more accurate assessment of the bank's performance relative to the volume and nature of its competition. The bank's lending performance is more comparable to its deposit base and the level and nature of competition in the MSA with the bank in the 24th percentile for deposits compared to its position in the fourth percentile for mortgage lending and ninth percentile for small business lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

Hartford MSA AA

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in both geographies, and also stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

New Haven MSA AA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in both geographies, and also stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's origination and purchase of small loans to businesses is excellent.

Hartford MSA AA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low-income geographies is excellent and the distribution in moderate-income geographies is good. The proportion of loans was stronger than the proportion of businesses in low-income geographies, and near to the proportion in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was stronger than the aggregate distribution of loans in those geographies, and near to the aggregate distribution of loans in moderate-income geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

New Haven MSA AA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low-income geographies is adequate and the distribution in moderate-income geographies is excellent. The proportion of loans was somewhat weaker than the proportion of businesses in low-income geographies, and stronger than the proportion in moderate-income geographies. The proportion of small loans to businesses in low- and moderate-income geographies was stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good.

Hartford MSA AA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending to low-income borrowers is adequate, and excellent to moderate-income borrowers. The proportion of loans was somewhat weaker than the proportion of low-income borrowers, and significantly stronger than moderate-income borrowers. The proportion of mortgage loans was significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. Performance in the 2017 evaluation period is consistent with the overall good performance.

New Haven MSA AA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending to low-income borrowers is adequate, and excellent to moderate-income borrowers. The proportion of loans was somewhat weaker than the proportion of low-income borrowers, and stronger than moderate-income borrowers. The proportion of mortgage loans was significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. Performance in 2017 is consistent with performance in the prior evaluation period, and good.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

Hartford MSA AA

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was somewhat weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. Additionally, the bank made a majority (89.6 percent) of its business loans in amounts of \$100 thousand or less, and addressed an identified need in the community for business loans in smaller amounts. Performance in the 2017 evaluation period is consistent with the overall good performance.

New Haven MSA AA

- The distribution of the bank's small loans to businesses during the 2014–2016 evaluation period is good. The proportion of loans was somewhat weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The significant majority (94.4 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans exceeded the proportion of small businesses and exceeded the aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Community Development Lending

Refer to Table 1 in the state of Connecticut section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

Hartford MSA AA

TDBNA's level of CD lending in the Hartford MSA AA is excellent, and has a significantly positive impact on lending performance in the AA. During the evaluation period, the bank originated 38 loans totaling \$68.7 million, representing 23.9 percent of allocated tier one capital. The bank was effective in helping to meet community credit needs through its CD lending. The bank's CD lending supported the development and retention of affordable housing and organizations providing community services to LMI individuals and families. Examples of the bank's CD loans include:

- Renewal of a \$15.0 million revolving line of credit used for bridge financing of construction and other costs to build a group home for an organization providing community services to LMI individuals;
- A \$13.0 million construction line of credit to rehabilitate and renovate an affordable housing development;
- A \$10.6 million construction line for the development of mixed-used multifamily housing with the majority (80 percent) designed as affordable for LMI residents (LIHTC project); and
- Renewal of a \$200 thousand demand line of credit to an organization providing services to enable women to break the cycle of poverty and create better lives for themselves and their families.

New Haven MSA AA

The bank's level of CD lending in the New Haven MSA AA is excellent, and has a significantly positive impact on its overall lending performance in the New Haven MSA AA. The bank originated seven CD loans totaling \$14.2 million during the evaluation period. CD loans represent 8.3 percent of allocated tier one capital. The bank was effective in helping to meet community credit needs through its CD lending. The bank supported the revitalization and stabilization of LMI areas and the development and retention of affordable housing through its CD lending. Specific examples of the bank's CD loans include:

- The extension of a \$9.2 million commercial real estate mortgage for financing the development of a grocery store-anchored retail center located in a low-income geography; and
- A \$2.3 million line of credit used to acquire and rehabilitate three former school structures into 213 units of affordable rental housing (LIHTC project).

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bridgeport MSA AA, the Norwich MSA AA, and the non-MSA Connecticut AA is consistent with the bank's overall Outstanding performance under the Lending Test in the state of Connecticut.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of Connecticut section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Hartford MSA AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 121 qualified investments totaling \$43.7 million. Additionally, 10 prior period investments totaling \$30.1 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represent 25.7 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made six LIHTC investments totaling \$41 million and one mortgage-backed security totaling \$430 thousand. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that provide affordable housing or other community service needs for LMI individuals and families such as financial literacy and education, homeownership classes, and asset building education.

Examples of qualified investments in this AA include:

- TDBNA provided \$9.3 million in LIHTC equity to fund the renovation of a 40-unit affordable housing rental property and to construct five new affordable rental units on the property. Forty of the units are restricted to families with income at or below 60 percent of the AMI and five of the units are restricted to families with income at or below 120 percent of the AMI;
- TDBNA provided \$4.8 million in LIHTC equity to fund the acquisition and rehabilitation of a 65-unit low-income senior housing project in Middletown, Connecticut. The project includes a mix of studio, one-bedroom, and two-bedroom units available to LMI seniors and disabled tenants with income at or below 60 percent of the AMI. All units are Section 8 subsidized in this complex;
- TDBNA provided \$12.3 million in LIHTC equity to fund the construction of a mixed-income, mixed-use multifamily housing project in Hartford, Connecticut. The project will contain 54 apartments and three thousand square feet of retail space. Thirty two apartments are restricted to tenants with income at or below 50 percent of the AMI and 11 are restricted to tenants with income at or below 60 percent of the AMI; and
- A \$125 thousand grant for the development of a blighted and abandoned power plant structure into 30 units of affordable housing.

New Haven MSA AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 75 qualified investments totaling \$24.9 million. Additionally, 14 prior period investments totaling \$43.7 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 40.0 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made two LIHTC investments totaling \$18.9 million, one SBIC investment of \$443.1 thousand, and six mortgage-backed securities totaling \$4.1 million. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that provide job training, small business counseling, affordable housing or other community service needs for LMI individuals and families such as financial literacy and education, homeownership classes, asset building education, and food or shelter.

Examples of qualified investments in this AA include:

- TDBNA provided \$14.8 million in LIHTC equity and \$4.2 million in state housing tax credit equity to fund the acquisition and rehabilitation of three existing low-income senior housing communities in Waterbury, Connecticut. Each community is a former schoolhouse that was converted into apartments. The project will preserve 213 units of affordable housing for seniors, and all units are subsidized by a project-based Section 8 rental contract;
- TDBNA provided grants totaling \$20 thousand to an economic development fund foundation that provides ongoing, one-on-one small business counseling and training;
- A \$10 thousand grant to a nonprofit organization that provides financial education and homeownership counseling. The organization is a HUD approved housing counseling agency and provides budget coaching services, education on creating basic budgets and spending plans, and homebuyer education classes to prepare LMI residents for first time homeownership; and
- TDBNA provided grants totaling \$70 thousand to a local food bank and soup kitchen that provide nutritious food to schoolchildren and families in need.

Statewide

TDBNA has two prior period statewide investments totaling \$1.2 million that remain outstanding and provide continuing benefit to the AA and two current period statewide investments totaling approximately \$950.8 thousand.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bridgeport MSA AA and non-MSA Litchfield County AAs is not inconsistent with the bank's overall outstanding performance under the Investment Test in the state of Connecticut. The bank's performance under the Investment Test in the Norwich MSA AA is weaker than the bank's overall outstanding performance and is considered good. The weaker performance is primarily due to a relatively lower amount of current period investments relative to the bank's operations in this AA. Performance in the limited-scope AAs did not significantly affect the Investment Test rating for the state of Connecticut. Refer to the Table 14 in the state of Connecticut section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the state of Connecticut section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Hartford MSA AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is good.

- Delivery systems are accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had an adequate number of branches and ATMs, as reflected in Table 15, in LMI areas compared to the population distribution.
- Additionally, the bank operated one branch in an urban middle-income area that was in the same neighborhood as a moderate-income geography. This branch was along public transit lines in the central business district that serves the entire community. This branch helped to expand access to bank products and services to this moderate-income geography.
- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, one branch was closed in a moderate-income area. This branch was closed due to its location in a challenging retail environment, with low productivity and declining consumer and small business deposits. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.

- Neither branch hours, or products and services offered at branches varied significantly between geographies of different income levels.

New Haven MSA AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is good.

- Delivery systems are accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had an adequate number of branches and ATMs, as reflected in Table 15, in LMI areas compared to the population distribution.
- Additionally, the bank operated four branches in urban middle-income areas that were in the same neighborhood as LMI geographies. Two of these branches were directly adjacent to a moderate-income geography. The remaining two branches were along public transit lines or in central business districts that serve the entire community. These branches helped to expand access to bank products and services to these LMI geographies.
- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, one branch was closed in a moderate-income area. This branch was closed due to highly duplicative TDBNA branch coverage in the area as two other bank branches were located within one mile of this branch. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service, or products and services offered at branches varied significantly between geographies of different income levels.
- The 2015 US Census ACS update had an impact on the geographic distribution of branches within the AA due to the redesignation of the income level of the geographies, not due to a change in the branch physical location. Specifically, while the number of branches in low-income geographies changed from one to two, the number of branches in moderate-income geographies went from four to two.

Community Development Services

Hartford MSA AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is good.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD

services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 45 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.

- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 85 financial education events totaling 222 hours. Twenty-nine of these events were homebuyer, 26 were financial literacy, and 30 were small business classes. A total of 1,537 participants attended these events, including 1,011 individuals and 526 small business owners. These events addressed an identified CD need in the area, namely financial education and entrepreneurial training programs.
- In addition to financial education classes, bank employees provided 470 hours in assistance to 13 qualifying organizations in the AA. This assistance was provided through board or committee membership, or volunteering technical expertise.

New Haven MSA AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is good.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 35 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 121 financial education events totaling 396 hours. Twenty-five of these events were homebuyer, 65 were financial literacy, and 31 were small business classes. A total of 3,952 participants attended these events, including 3,509 individuals and 443 small business owners. These events addressed an identified CD need in the area, namely financial education and entrepreneurial training programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bridgeport MSA AA and non-MSA Litchfield County AA is consistent with the bank's overall High Satisfactory performance under the Service Test in Connecticut. In the Norwich MSA AA the bank's performance is weaker than the bank's overall performance in the state. This is due to the bank's very limited presence (one branch) in the AA, along with there being no LMI geographies. Given the bank's very limited presence, the performance is considered adequate, and did not impact conclusions about the bank's performance in the state. Refer to Table 15 in the state of Connecticut section of Appendix D for the facts and data that support these conclusions.

State of Delaware

CRA Rating for Delaware⁸: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is excellent, based upon excellent home mortgage and small business lending .
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon excellent home mortgage and good small business lending;.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the communities in which it operated.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Delaware

TDBNA has delineated two AAs within the state of Delaware. These include two MSAs, specifically: the complete Dover MSA and the partial MSA of Salisbury (Sussex County, City of Lewes and Town of Milton only). TDBNA has approximately \$103.5 million in deposits within the state representing 0.07 percent of adjusted total deposits (this figure is exclusive of deposits attributable to Wilmington, which is part of the Philadelphia MMSA). As of June 30, 2017, TDBNA ranked second in the state. However, this ranking is misleading as it based upon deposits attributable to Wilmington, which is part of the Philadelphia MMSA. Banking competition is strong with 42 FDIC-insured depository institutions in the State of Delaware. TDBNA has a small presence in the state with three branches and four deposit-taking ATMs.

⁸ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

During the evaluation period, TDBNA made 0.4 percent of their HMDA loans and 0.1 percent of their small business loans within the state.

Refer to the community profiles for Delaware in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Delaware

The Dover MSA AA was selected for a full scope review. The Dover MSA AA accounts for 70.9 percent of deposits; 66.7 percent of the branches; 56.9 percent of HMDA lending and 74.0 percent of small business lending in the state.

Three community contacts were performed in the state related to this evaluation; all in the Dover MSA AA. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DELAWARE

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The market shares and rankings for TDBNA's mortgage lending and small business loans are weaker than its deposit market share and ranking. The bank has a very limited presence in the MSA AA that is consistent with a secondary market. The bank has the seventh largest branch network in the MSA AA consisting of two branches. Although this is a small market, there is strong competition in the MSA AA for deposits and loans. Large shares of the deposit and loan markets are concentrated between a limited number of institutions. These market conditions within the MSA AA, combined with the bank's limited presence, have created significant challenges for the bank to achieve larger volumes of loans and additional deposit growth.

TDBNA has a deposit market share of 4.4 percent, resulting in a market ranking of seventh out of 11 deposit-taking institutions. The bank's market ranking places it within the 63rd percentile of depository institutions. The five largest institutions, based upon deposit market share, hold 84.0 percent of the deposit market.

The bank has a market share of 1.3 percent for mortgage lending and is the 22nd-ranked lender out of 302 lenders in the MSA AA. The market for loans is very competitive and the competition consists of national and local lenders of varying sizes, including national

megabanks. The five largest mortgage lenders have captured 24.0 percent of the market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the seventh percentile of all mortgage lenders in the MSA AA.

The bank has a market share of 1.2 percent for small business lending and is the 18th-ranked lender out of 68 lenders. Although the market is geographically small and consists of a relatively-small number of lenders, it consists of national and local lenders of different sizes. It also includes national issuers of small business credit cards. Competition for loans is very strong in the MSA AA. The five largest lenders have captured 49.0 percent of the market for small business loans. Comparing TDBNA's market ranking for small business lending to the number of lenders in the market, the bank is in the 26th percentile for small business lenders.

Mortgage and small business market shares and rankings are weaker than the bank's deposit market share and ranking. Comparing the bank's percentile rankings within its respective markets is a more accurate assessment of the bank's performance relative to the volume and nature of its competition. The bank's lending performance is more comparable to its deposit base and the level and nature of competition in the MSA AA with the bank in the 63rd percentile for deposits compared to its position in the seventh percentile for mortgage lending and 26th percentile for small business lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

- TDBNA's distribution of home mortgage lending in moderate-income geographies during the 2014-2016 evaluation period is excellent. The proportion of loans was significantly stronger than both the proportion of owner-occupied housing units in moderate-income geographies, and the aggregate distribution of loans in those geographies. There were no low-income tracts within the AA during the 2014-2016 evaluation period.
- Performance in the 2017 evaluation period is weaker than the performance in the 2014-2016 period and considered adequate. The weaker performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is excellent.

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of businesses in moderate-income geographies, and stronger than the

aggregate distribution of loans in those geographies. There were no low-income tracts in the assessment area during the earlier evaluation period. The bank's performance in the 2017 evaluation period is consistent with performance in the 2014-2016 evaluation period.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Tables P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is excellent.

- The distribution of the bank's home mortgage lending during the 2014–2016 evaluation period is excellent. The proportion of loans was near to the proportion of low-income families, and significantly stronger than the proportion of moderate-income families. The distribution of mortgage lending to LMI borrowers is significantly stronger than the aggregate distribution of loans to those borrowers. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was somewhat weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The bank also made a majority (88.9 percent) of its business loans in the amount of \$100 thousand or less and addressed an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans exceeded the proportion of small businesses and exceeded the aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Community Development Lending

Refer to Table 1 in the state of Delaware section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

The bank's CD lending performance in the Dover MSA AA is excellent, and has a significantly positive impact on overall lending performance in the AA. During the evaluation period, the bank originated eight loans totaling \$19.5 million and representing 268.1 percent of allocated tier one capital. Seven of the bank's CD loans helped address the community need for affordable housing. The remaining loan supported the revitalization and stabilization of LMI areas. Specific examples of the bank's CD loans include:

- A \$6.2 million construction loan to rehabilitate a multifamily unit providing 66-units of affordable housing (LIHTC project); and
- Purchase of a \$735 thousand loan originated by a CDFI to a partnership to refinance affordable housing and improvements.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Salisbury MSA AA is weaker than the bank's overall Outstanding performance under the Lending Test.

- Performance in the Salisbury MSA AA is weaker because of weaker borrower distribution of home mortgage and small business and CD lending. A geographic distribution of lending cannot be performed in the Salisbury MSA AA because it does not have any low- or moderate-income areas. The limited-scope AA performance had a neutral impact on the overall Lending Test performance rating in the state of Delaware.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of Delaware section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 23 qualified investments totaling \$1.5 million. Additionally, one prior period investments totaling \$34.2 thousand remains outstanding and provides continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 20.8 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, asset building, food, and shelter.

Examples of qualified investments in this AA include:

- TDBNA invested in nine mortgage-backed security pools totaling \$1.3 million; and
- Grants totaling \$40 thousand to a nonprofit organization that specializes in affordable housing development, education, and lending.

Statewide

TDBNA has one statewide investment totaling \$415.6 thousand.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank’s performance under the Investment Test in the Salisbury MSA AA is not inconsistent with the bank’s overall Outstanding performance under the Investment Test in the state of Delaware. Performance in the limited-scope AA did not significantly affect the Investment Test rating for the state of Delaware. Refer to the Table 14 in the state of Delaware section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the state of Delaware section of Appendix D for the facts and data used to evaluate the distribution of the bank’s branch delivery system, branch openings and closings, and distribution of the bank’s deposit-taking ATMs.

Based on the data in Table 15 and the following performance context considerations, we concluded the bank’s retail service performance is adequate.

- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA.
- The bank’s branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank did not have any branches or ATMs in LMI geographies, as reflected in Table 15. Due to the bank’s very limited presence in the AA (two branches) this performance is considered adequate. Additionally, prior to the 2015 US Census ACS update which went into effect in 2017, there were no low-income geographies within the AA.
- The bank did not have any branch openings or closings during the evaluation period.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is adequate.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 10 bank employees either provided financial literacy training to LMI individuals or small business owners or held board or committee positions with qualifying organizations. These employees account for over one half of the bank's employees in the AA.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 10 financial education events totaling 25 hours. Five of these events were homebuyer and five were small business classes. A total of 149 participants attended these events, including 113 individuals and 36 small business owners. These events addressed an identified CD need in the area, namely homeownership education for LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Salisbury MSA AA is consistent with the bank's overall Low Satisfactory performance under the Service Test in Delaware. Refer to Table 15 in the state of Delaware section of Appendix D for the facts and data that support these conclusions.

State of Florida

CRA Rating for Florida⁹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is excellent, based upon good home mortgage and excellent small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon adequate home mortgage and good small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are readily accessible to geographies and individuals of different income levels. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the communities in which it operated.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Florida

TDBNA has delineated sixteen AAs within the state of Florida. These include fourteen in MSAs and two in non-MSA areas. For analysis purposes, we combined the non-MSA areas into one area. Specifically, the AAs include the complete MSAs of: Deltona-Daytona-Ormond Beach; Homosassa Springs; Lakeland-Winter Haven; Miami-Fort Lauderdale-Pompano Beach; Naples-Immokalee-Marco Island; Ocala; Orlando-Kissimmee-Sanford; Palm Bay-Melbourne-Titusville; Port St. Lucie; Sebastian-Vero Beach; Sebring; and Tampa-St. Petersburg-Clearwater; the partial MSAs of Gainesville (excluding Gilchrist County) and Jacksonville (excluding Clay and Nassau counties); and the non-MSA areas of Okeechobee County and North Florida (consisting of Bradford, Columbia, Putnam, Suwannee, and Union Counties).

⁹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

TDBNA reported \$11.7 billion in deposits or 7.9 percent of adjusted deposits within the state. As of June 30, 2017, TDBNA ranked eleventh in the state with a deposit market share of 3.2 percent. Major banking competitors include Bank of America, N.A., Wells Fargo Bank, N.A., SunTrust Bank; and JPMorgan Chase Bank, N.A., with deposit market shares of 19.2 percent, 14.1 percent, 8.7 percent, and 5.8 percent, respectively. Banking competition is very strong with 227 FDIC-insured depository institutions in the State of Florida. TDBNA has a large presence in the state with 152 branches and 217 deposit-taking ATMs. During the evaluation period, TDBNA made 15.7 percent of their HMDA loans and 11.8 percent of their small business loans within the state.

Refer to the community profiles for Florida in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Florida

The Miami-Fort Lauderdale-Pompano Beach MSA (Miami MSA AA) and the Tampa-St. Petersburg-Clearwater MSA (Tampa MSA AA) were selected for full scope reviews. The Miami MSA accounts for 54.0 percent of deposits; 48.0 percent of the branches; 36.9 percent of HMDA lending; and 56.4 percent of small business lending in the state; and the Tampa MSA accounts for 7.9 percent of deposits; 9.9 percent of the branches; 8.3 percent of HMDA lending; and 7.7 percent of small business lending in the state.

Ten community contacts were performed in the state related to this evaluation; five each within the two full-scope areas. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

Miami MSA AA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage and small business loans are weaker than its deposit market share and ranking. The Miami MSA AA is a large market with significant numbers of competitors for deposits and loans. The bank is one of the largest competitors in the market, with the seventh-largest deposit market share and branch network. However, the market for deposits and loans is highly competitive with large numbers of local and national

competitors. The competition makes it very challenging for TDBNA to acquire additional deposits and grow the loan portfolios.

TDBNA has a deposit market share of 3.1 percent, with a market ranking of seventh out of 99 deposit-taking institutions. The bank's market ranking places it in the seventh percentile of depository institutions. The five largest institutions, based upon deposit market share, hold 54.0 percent of the deposit market.

The bank is the 20th-ranked mortgage lender with a market share of 1.0 percent for mortgage lending. The market has 1,081 lenders in the MSA AA. The market for mortgage loans is very competitive and the competition consists of local and national institutions of differing sizes, including megabanks. The five largest mortgage lenders hold 23.0 percent of the market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the first percentile of all mortgage lenders in the MSA AA.

TDBNA is the 16th-ranked small business lender with 0.7 percent of the market. The market has 239 lenders. The market consists of national and local lenders of different sizes, including megabanks and national issuers of small business credit cards. Competition for loans is very strong in the MSA AA. The five largest small business lenders have captured 72.0 percent of the market. Comparing TDBNA's market ranking for small business lending to the number of lenders in the market, the bank is in the ninth percentile for small business lenders.

Mortgage and small business market shares and rankings are weaker than the bank's deposit market share and ranking. Comparing the bank's percentile rankings within its respective markets is a more accurate assessment of the bank's performance relative to the volume and nature of its competition. The bank's lending performance is more comparable to its deposit base and the level and nature of competition in the MSA AA with the bank in the seventh percentile for deposits compared to the first percentile for mortgage lending and sixth percentile for small business lending.

Tampa MSA AA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The market shares and rankings for TDBNA's mortgage lending and small business loans are weaker than its deposit market share and ranking. The bank is the 12th largest depository institution in the Tampa market, with the tenth-largest branch network. As with the Miami MSA AA, the Tampa MSA AA has significant numbers of competitors for deposits and loans. The market for deposits and loans is highly competitive with a large number of local and national competitors. The level of competition within the Tampa market makes it very challenging for TDBNA to acquire additional deposits and grow the loan portfolios.

TDBNA has a deposit market share of 1.3 percent, resulting in a market ranking of 12th out of 63 deposit-taking institutions. The bank is in the 19th percentile of depository institutions,

based upon its market ranking. The five largest institutions hold 68.0 percent of the deposit market.

The bank has a share of 0.4 percent of the mortgage market and is the 55th-ranked lender out of 1,064 lenders in the MSA AA. The market for loans is very competitive and the competition consists of national and local lenders of varying sizes, including megabanks. The five largest lenders have captured 21.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the fifth percentile of mortgage lenders in the Tampa MSA.

The bank has a market share of 0.3 percent for small business lending and is the 30th-ranked lender out of 161 lenders. The market is highly competitive with national and local lenders of different sizes. It also includes national issuers of small business credit cards. The five largest lenders have captured 64.0 percent of the small business lending market. Comparing TDBNA's small business lending market ranking to the number of lenders in the market, the bank is in the 18th percentile for small business lenders.

Mortgage and small business market shares and rankings are weaker than the bank's deposit market share and ranking. Comparing the bank's percentile rankings within its respective markets is a more accurate assessment of the bank's performance relative to the volume and nature of its competition. The bank's lending performance is more comparable to its deposit base and the level and nature of competition in the MSA AA with the bank in the 19th percentile for deposits compared to its position in the fifth percentile for mortgage lending and 18th percentile for small business lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is good.

Miami MSA AA

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in low-income geographies is adequate, and distribution in moderate-income geographies is good. The proportion of loans was somewhat weaker than the proportion of owner-occupied housing units in low-income geographies, and near to the distribution of housing units in moderate-income geographies. The bank's home mortgage lending is stronger than the aggregate distribution of loans in both low- and moderate-income geographies. Performance in the 2017 evaluation period is consistent with performance in the prior period.

Tampa MSA AA

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in low-income geographies is adequate, and distribution of lending in moderate-income geographies is excellent. The proportion of loans was somewhat weaker than the proportion of owner-occupied housing units in low-income geographies, and exceeds the distribution of housing units in moderate-income geographies. The bank's home mortgage lending is stronger than the aggregate distribution of loans in both low- and moderate-income geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is excellent.

Miami MSA AA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of businesses in low-and moderate-income geographies. The proportion of small loans to businesses in both low- and moderate-income geographies was stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Tampa MSA AA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of businesses in low-and moderate-income geographies. The proportion of small loans to businesses in both low- and moderate-income geographies was stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is adequate.

Miami MSA AA

- The distribution of the bank's home mortgage lending during the 2014–2016 evaluation period is adequate. The proportion of loans was significantly weaker than the proportion of low-income families, and somewhat weaker than the proportion of moderate-income

families. The proportion of home mortgage loans was stronger than the aggregate distribution of loans to low- and moderate-income borrowers.

- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period, and considered excellent. The bank's performance is stronger because the proportion of loans was somewhat weaker than the proportion of low-income families and stronger than the proportion of moderate-income families. The stronger performance in the 2017 evaluation period has minimal impact on our evaluation of the bank's overall lending performance because the evaluation is based upon a significantly shorter evaluation period.

Tampa MSA AA

- The distribution of the bank's home mortgage lending during the 2014–2016 evaluation period is good. The proportion of loans was weaker than the proportion of low-income families and stronger than the proportion of moderate-income families. The bank's proportion of lending is stronger than the aggregate distribution of loans to low- and moderate-income families.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and excellent. Performance is stronger because the proportion of loans was weaker than the proportion of low-income families and significantly stronger than the proportion of moderate-income families. The stronger performance in the 2017 evaluation period has minimal impact on our evaluation of the bank's overall lending performance because the evaluation is based upon a significantly shorter evaluation period.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

Miami MSA AA

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was somewhat weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The significant majority (91.2 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts. Performance in the 2017 evaluation period is consistent with the overall good performance.

Tampa MSA AA

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was somewhat weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to

those businesses. The majority (89.0 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts. Performance in the 2017 evaluation period is consistent with the overall good performance..

Community Development Lending

Refer to Table 1 in the state of Florida section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

Miami MSA AA

The bank's level of CD lending in the Miami MSA AA is excellent, and has a significantly positive impact on lending performance in the AA. During the evaluation period, the bank originated 32 loans totaling \$100.9 million. The bank's level of CD lending represents 16.1 percent of allocated tier one capital. TDBNA effectively helped meet community credit needs through its CD lending. The bank's CD lending supported the development and retention of affordable housing, the revitalization and stabilization of LMI areas, and organizations providing community services to LMI individuals and families. Examples of the bank's CD loans include:

- An \$18.4 million commercial real estate mortgage for the acquisition of a multi-tenant shopping center located within a moderate-income census tract. The shopping center is bordered to the north and east by LMI tracts. The shopping center will provide necessary services (grocery store, medical care, financial services) and employment opportunities for local residents;
- A \$17.7 million construction loan for 100 new units of affordable rental housing for senior citizens. All of the units will be income qualified and affordable (LIHTC project);
- A \$13.5 million construction loan to support the rehabilitation of 144-units of affordable housing. All units will be income qualified and affordable (LIHTC project); and
- A \$5 million tax-exempt term loan to enable an organization providing free civil legal services to LMI individuals to gain ownership of its own administrative building.

Tampa MSA AA

TDBNA's CD lending in the Tampa MSA AA is excellent, and has a significantly positive impact on its overall lending performance in the Tampa AA. The bank originated 14 CD loans totaling \$49.7 million during the evaluation period. CD lending represents 54.3 percent of allocated tier one capital. The bank was effective in helping to meet community credit needs through its CD lending. The bank's CD lending supported organizations providing community services, the development and retention of affordable housing, and the revitalization and stabilization of LMI areas. Examples of the bank's CD loans include:

- An \$11.3 million term loan to refinance Community Redevelopment Agency Revenue Notes. The majority of the financing went to the development of a new recreation and aquatic center in a moderate-income geography. The development was included in the city Community Redevelopment Plan;
- A \$10 million participation in \$20 million financing for a 417-unit apartment complex. Approximately 271 of the 417 units will be affordable, renting to individuals and families with income below 80 percent of the AMI; and
- The renewal of a \$5 million line of credit to an organization providing affordable primary health care to LMI individuals and families. Ninety percent of the organization's clients have annual income below 200 percent of the federal poverty line.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Deltona, Gainesville, Homosassa Springs, Jacksonville, Lakeland, Naples, Ocala, Orlando, Palm Bay, Port St. Lucie, Sebastian, and Sebring MSA AAs, and the Florida non-MSA AA is consistent with the bank's overall Outstanding performance under the Lending Test in the state of Florida.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of Florida section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Miami MSA AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 377 qualified investments totaling \$111.3 million. Additionally, 14 prior period investments totaling \$50.7 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 25.9 percent of tier one capital allocated to this AA. TDBNA has \$5.3 million in unfunded commitments.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA funded six LITHCs totaling \$69.8 million, two SBIC investments totaling \$2.9 million, one loan fund totaling \$721.8 thousand, and 45 mortgage-backed security pools totaling \$27.8 million. A substantial majority of the dollar volume of the bank's current and prior period investments focus on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, asset building, food, and shelter.

Examples of qualified investments in this AA include:

- TDBNA provided \$19.2 million in LIHTC equity to fund the rehabilitation of a 144-unit affordable housing complex for LMI families. Fifteen of the units are restricted to residents with income at or below 33 percent of the AMI, and 129 units are restricted to residents with income at or below 60 percent of the AMI. All units are subsidized by a project-based Section 8 rental contract. Additionally, 6,300 square feet of commercial space will be used as a daycare facility;
- TDBNA provided \$24 million of LIHTC equity to fund the creation of 100 units of affordable rental housing in an age restricted (55+) community in Margate, Florida. Of the 100 units, 90 are restricted to residents with income at or below 60 percent of the AMI, and 10 are reserved for residents with income at or below 33 percent of the AMI;
- A \$125 thousand grant to an organization that provides emergency shelter to homeless women, youth, and children. The organization is constructing a new mixed-use “village” that combines shelter facilities and supportive services for homeless individuals and families to meet the dire need for more service-rich emergency shelter and increased capacity; and
- Grants totaling \$30 thousand to an organization that provides literacy programs for LMI children.

Tampa MSA AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 91 qualified investments totaling \$18.2 million. Additionally, four prior period investments totaling \$12.7 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 33.7 percent of tier one capital allocated to this AA.

The bank’s responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made two LIHTC investments totaling \$14.5 million and two SBIC investments totaling \$1.2 million. A substantial majority of the dollar volume of the bank’s current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, asset building, food, and shelter.

Examples of qualified investments in this AA include:

- TDBNA provided \$12.5 million of LIHTC equity to fund the construction of a 53-unit affordable housing development in St. Petersburg, Florida. Of the 53 units, 47 are restricted to households with income at or below 60 percent of the AMI, and six are restricted to households with income at or below 40 percent of the AMI;
- Grants totaling \$7.5 thousand to a nonprofit organization to support their financial capability program, which expands economic opportunities and increases the financial

stability of LMI persons by providing financial education, credit counseling services, and specialized financial products;

- Grants totaling \$17.5 thousand to a nonprofit organization to support two programs. One is a “Homemaker Services for Frail Elderly” program, which provides low-income seniors with basic needs, and the other is a Women to Work program, which is an evidence-based prevention program for teen mothers and pregnant girls identified as high risk for academic failure; and
- Grants totaling \$17.5 thousand to nonprofit organization to support two programs. One is an after school program for school age children experiencing homelessness, and the other is a workforce development program for homeless and at-risk homeless individuals.

Statewide

TDBNA has one prior period statewide investment totaling \$10 thousand that remains outstanding and provides continuing benefit to the AA and one current period statewide investment totaling approximately \$433.8 thousand.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Deltona, Gainesville, Jacksonville, Lakeland, Naples, Ocala, Orlando, Palm Bay, Port St. Lucie, Sebastian-Vero Beach, and Sebring MSA AAs is not inconsistent with the bank’s overall Outstanding performance under the Investment Test in the state of Florida. The bank’s performance under the Investment Test in the Homosassa Springs MSA AA and the non-MSA AA is weaker than the bank’s overall Outstanding performance and is considered good and adequate, respectively. The weaker performance is primarily due to a lower amount of investments relative to the bank’s operations in the AAs. Performance in the limited-scope AA did not significantly affect the Investment Test rating for the state of Florida. Refer to the Table 14 in the state of Florida section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the state of Florida section of Appendix D for the facts and data used to evaluate the distribution of the bank’s branch delivery system, branch openings and closings, and distribution of the bank’s deposit-taking ATMs.

Miami MSA AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had a sufficient number of branches and ATMs, as reflected in Table 15, in LMI areas compared to the population distribution.
- Additionally, the bank operated 10 branches in urban middle-income areas and six branches in upper-income areas that were in the same neighborhood as moderate-income geographies. Multiple branches were directly adjacent to moderate-income geographies. The remaining branches were along public transit lines or in central business districts that serve the entire community. These branches helped to expand access to bank products and services to these LMI geographies.
- The opening and closing of branches, reflected in Table 15, had a relatively limited impact on the delivery of service across the community. As evidenced by the table, the bank had a net increase of six branches in the AA, including one in a low-income geography and two in moderate-income geographies. All branch closures were located in upper-income geographies. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Tampa MSA AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had a sufficient number of branches and ATMs, as reflected in Table 15, in LMI areas compared to the population distribution.
- Additionally, the bank operated two branches in urban middle-income areas and one branch in an upper-income area that were in the same neighborhood as moderate-income geographies. One of these branches was directly adjacent to a moderate-income geography. The remaining two branches were along public transit lines or in central business districts that serve the entire community. These branches helped to expand access to bank products and services to these LMI geographies.

- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, one branch was closed in a moderate-income area. This branch was closed due to declining transaction volume in the branch. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Miami MSA AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is excellent.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 97 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 183 financial education events totaling 641 hours. Sixty-five of these events were homebuyer, 53 were financial literacy, and 65 were small business classes. A total of 5,498 participants attended these events, including 3,987 individuals and 1,511 small business owners. These events addressed an identified CD need in the area, namely financial education programs.
- In addition to financial education classes, bank employees provided 970 hours in assistance to 27 qualifying organizations in the AA. This assistance was provided through board or committee membership, or volunteering technical expertise.

Tampa MSA AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is good.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities. During the

evaluation period, 24 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.

- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 86 financial education events totaling 196 hours. Eighteen of these events were homebuyer, 35 were financial literacy, and 33 were small business classes. A total of 2,173 participants attended these events, including 1,697 individuals and 476 small business owners. These events addressed an identified CD need in the area, namely financial education programs.
- In addition to financial education classes, bank employees provided 257 hours in assistance to 12 qualifying organizations in the AA. This assistance was provided through board or committee membership, or volunteering technical expertise.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Deltona MSA AA, Orlando MSA AA, and Port St. Lucie MSA AA is consistent with the bank's overall Outstanding performance under the Service Test in Florida. Performance in the Palm Bay MSA AA, Sebastian MSA AA, and non-MSA Florida AA is weaker than the bank's overall performance in the state, and is considered good. Performance in the Gainesville MSA AA, Homosassa Spring MSA AA, Jacksonville MSA AA, Lakeland MSA AA, Naples MSA AA, Ocala MSA AA, and Sebring MSA AA is also weaker than the bank's overall performance in the state, and is considered adequate. Weaker performance is due to the bank's limited presence in these AAs, and did not impact conclusions about the bank's performance in the state. Refer to Table 15 in the state of Florida section of Appendix D for the facts and data that support these conclusions.

State of Maine

CRA Rating for Maine¹⁰: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is good, based upon good home mortgage and excellent small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage and small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are readily accessible to geographies and individuals of different income levels. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the communities in which it operated.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities

Description of Institution's Operations in Maine

TDBNA has delineated five AAs within the state. They include the Bangor, Lewiston-Auburn, and Portland-South Portland-Biddeford MSAs and two non-MSA AAs consisting of the counties of Aroostook, Franklin, Hancock, Kennebec, Knox, Lincoln, Oxford, Somerset, and Waldo. For analysis purposes, we combined the non-MSAs into one area. TDBNA reported \$3.5 billion in deposits or 2.4 percent of adjusted deposits in the state. As of June 30, 2017, TDBNA ranked first in the state with a deposit market share of 13.5 percent. Major competitors include The Camden National Bank; Bangor Savings Bank, and Key Bank, N.A., with deposit market shares of 10.6 percent, 10.0 percent, and 9.3 percent, respectively.

¹⁰ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Banking competition is moderate with 31 FDIC-insured depository institutions in the state of Maine. TDBNA has an established presence in the state with 44 branches and 58 deposit-taking ATMs. During the evaluation period, TDBNA made 4.8 percent of their HMDA loans and 2.5 percent of their small business loans within the state.

Refer to the community profiles for Maine in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Maine

The Portland-South Portland-Biddeford MSA (Portland MSA AA) and the non-MSA Maine AA were selected for full scope reviews. The Portland MSA accounts for 46.8 percent of deposits; 52.3 percent of the branches; 51.8 percent of HMDA lending; and 53.6 percent of small business lending in the state; and the non-MSA Maine AA accounts for 26.0 percent of deposits; 29.6 percent of the branches; 30.9 percent of HMDA lending and 22.7 percent of small business lending in the state.

Four community contacts were performed in the state related to this evaluation; one on the Portland MSA AA and three in the non-MSA Maine AA. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MAINE

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

Portland MSA AA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage lending and small business loans are weaker than its deposit market share and ranking. The Portland MSA AA is a smaller market consisting of only 21 depository institutions. TDBNA is one of nine institutions in the market with total deposits in excess of \$1 billion; TDBNA having the largest deposit market share and the largest branch network. Of the remaining 12 institutions, only three have total deposits of \$500 million or less. The smaller market consisting primarily of larger institutions, with a significant amount of the deposit market concentrated in five institutions, creates a very competitive market.

TDBNA has a deposit market share of 17.2 percent, resulting in a market ranking of first out of 21 deposit-taking institutions. The bank's market ranking places it in the fourth percentile of

depository institutions. The five largest institutions, including TDBNA, hold 59.0 percent of the deposit market.

The bank has a mortgage lending market share of 2.1 percent and is the ninth-ranked lender out of 395 lenders in the MSA. The market is very competitive. It consists of a significant number of competitors, both local and national in scale, including some of the largest institutions in the country. The five largest lenders hold 20.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the first percentile of all mortgage lenders in the MSA.

TDBNA has a market share of 4.9 percent in the small business lending market and is the sixth-ranked lender out of 127 lenders. The market consists of national and local lenders of different sizes, including megabanks and national issuers of small business credit cards. Competition for loans is very strong in the MSA. The five largest small business lenders have captured 54.0 percent of the market. Comparing TDBNA's market ranking for small business lending to the number of lenders in the market, the bank is in the fourth percentile for small business lenders.

TDBNA's mortgage and small business market shares and rankings are weaker than its deposit market share and ranking. Comparing the bank's lending performance to its deposit base, as percentile rankings, incorporates the volume and nature of the bank's competition into the performance evaluation. The bank's lending performance, measured as a percentile ranking, is comparable to the deposit base. TDBNA's deposit base, as a percentile ranking, is in the fourth percentile while mortgage lending is in the first percentile and small business lending is in the fourth percentile. The bank's lending activity performance is comparable to the deposit base. Lending activity is adequate.

Maine Non-MSA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is good. The bank originated a significant volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage lending and small business loans are weaker than its deposit market share and ranking. Similar to the Portland market, the Maine non-MSA AA is a small market, consisting of only 22 depository institutions. TDBNA has the fifth-largest deposit market share and the fourth-largest branch network. A significant share of the deposit market is concentrated in five institutions, including TDBNA, which have captured 60.0 percent of the deposit market. The small market, with a significant percentage of the deposit market concentrated among five institutions, creates a very competitive market.

TDBNA has a deposit market share of 9.6 percent, resulting in a market ranking of fourth out of 22 deposit-taking institutions as of June 30, 2017. The bank's market ranking places it in the 22nd percentile of depository institutions.

The bank has a market share of 2.2 percent for mortgage lending and is the tenth-ranked lender out of 328 lenders in the MSA. The market for loans is very competitive and the

competition consists of national and local lenders of varying sizes, including megabanks. The five largest lenders have captured 27.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the third percentile of mortgage lenders in the MSA.

The bank has a market share of 3.1 percent for small business lending and is the tenth-ranked lender out of 126 lenders. It consists of national and local lenders of different sizes, including large issuers of small business credit cards. Competition for loans is very strong in the MSA. The five largest lenders have captured 47.0 percent of the small business lending market. Comparing TDBNA's small business lending market ranking to the number of lenders in the market, the bank is in the seventh percentile for small business lenders.

TDBNA's mortgage and small business market shares and rankings are weaker than its deposit market share and ranking. Evaluating the bank's performance by comparing the bank's lending performance to its deposit base, as percentile rankings, incorporates the volume and nature of the bank's competition into the evaluation. The bank's lending performance, measured as a percentile ranking, exceeds deposits. TDBNA's deposit base, as a percentile ranking, is in the 22th percentile while mortgage lending is in the third percentile and small business lending is in the seventh percentile. The bank's lending activity performance is good.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Tables O and 5 and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is good.

Portland MSA AA

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in both geographies, and also stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.
- During the 2014-2016 evaluation period, the distribution of multifamily loans in both low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in both geographies. We could not assess performance in the 2017 evaluation period due to the limited volume of multifamily loans during the period.

Maine Non-MSA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending in moderate-income geographies is good. The proportion of loans was somewhat weaker than the proportion of owner-occupied housing units in moderate-income

geographies. The proportion of the bank's home mortgage loans is stronger than the aggregate distribution of loans in moderate-income geographies. There are no low-income geographies in the bank's assessment area.

- The bank's performance in the 2017 evaluation period is stronger than the performance in the 2014-2016 evaluation period. Performance is excellent. The proportion of loans exceeds the proportion of owner-occupied housing units in moderate-income geographies. The stronger performance in the 2017 evaluation period has minimal impact on our overall Lending Test assessment because of the shorter evaluation period relative to the prior evaluation period.

Small Loans to Businesses

Based on the data in Table Q and Table 7 and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is excellent.

Portland MSA AA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low-income geographies is excellent and the distribution in moderate-income geographies is good. The proportion of loans substantially meets the proportion of businesses in low-income geographies, and is near to the proportion in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was stronger than the aggregate distribution of loans in those geographies, and near to the aggregate distribution of loans in moderate-income geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Maine Non-MSA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in moderate-income geographies is excellent. The proportion of loans was near to the proportion of businesses in moderate-income geographies. The proportion of small loans to businesses in moderate-income geographies was stronger than the aggregate distribution of loans in those geographies. There are no low-income geographies in the AA.
- The bank's performance in the 2017 evaluation period is weaker than the performance in the 2014-2016 evaluation period and considered good. The weaker performance was due to the proportion of small loans to businesses in moderate-income geographies that was comparable to the aggregate distribution of loans in those geographies. The stronger performance in the 2017 has minimal impact on our overall Lending Test assessment because of the shorter evaluation period relative to the prior evaluation period.
- During the 2014–2016 evaluation period, the distribution of small loans to farms in moderate-income geographies is excellent. The proportion of loans exceeded the proportion of farms in moderate-income geographies. The proportion of small loans to farms in moderate-income geographies was stronger than the aggregate distribution of loans in those geographies. There are no low-income geographies in the AA. We could

not assess performance in the 2017 evaluation period due to the limited volume of small farms loans during the period.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good.

Portland MSA AA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending to low-income borrowers is adequate, and excellent to moderate-income borrowers. The proportion of loans was somewhat weaker than the proportion of low-income borrowers, and stronger than moderate-income borrowers. The proportion of mortgage loans was significantly stronger than the aggregate distribution of loans to low- and stronger to moderate-income borrowers. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Maine Non-MSA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending to low-income borrowers is adequate, and excellent to moderate-income borrowers. The proportion of loans was somewhat weaker than the proportion of low-income borrowers, and stronger than moderate-income borrowers. The proportion of mortgage loans was significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Tables R and 12 and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is good.

Portland MSA AA

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. Additionally, the bank made a significant majority (92.8 percent) of its business loans in amounts of \$100 thousand or less, and addressed an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans

exceeded the proportion of small businesses and exceeded the aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Maine Non-MSA

- The distribution of the bank's small loans to businesses during the 2014–2016 evaluation period is good. The proportion of loans was somewhat weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The significant majority (91.7 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts. Performance in the 2017 evaluation period is consistent with the bank's performance in the 2014-2016 evaluation period, and considered good.
- The distribution of the bank's small loans to farms during the 2014–2016 evaluation period is good. The proportion of loans was somewhat weaker than the proportion of small farms, and somewhat weaker than the market share of loans to those businesses. Performance in the 2017 evaluation period was not able to be assessed due to the limited volume during the period.

Community Development Lending

Refer to Table 1 in the state of Maine section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. (Table 5 does not separately list community development loans).

Portland MSA AA

TDBNA's volume of CD loans originated in the Portland MSA AA is excellent, and has a significantly positive impact on lending performance in the AA. The bank originated 17 CD loans totaling \$35.7 million during the evaluation period. CD lending in the Portland MSA represents 17.6 percent of allocated tier one capital. TDBNA effectively helped meet community credit needs through its CD lending. The significant majority of the bank's CD lending supports the development and retention of affordable housing. Other CD loans supported the revitalization and stabilization of LMI areas and organizations providing community services to LMI individuals and families. Some examples of the bank's CD loans include:

- A \$4.7 million draw on a \$25 million line of credit used to bridge LIHTC capital injections. The LIHTC project is funding the acquisition and rehabilitation of 84 family-style units of affordable housing in three scattered sites (LIHTC project); and

- A \$4 million loan to provide funding for a CDFI. The CDFI's objective is to help grow good jobs, environmentally sustainable enterprises, and shared prosperity for all people, especially those with low income.

Maine Non-MSA AA

The bank's CD lending in the Maine non-MSA AA is excellent, and has a significantly positive impact on its overall lending performance in the AA. During the evaluation period, the bank originated 14 CD loans for \$12.1 million, representing 13.6 percent of allocated tier one capital. The bank effectively helped meet community credit needs through its CD lending. The bank's CD lending supported organizations providing community services and the development and retention of affordable housing. Specific examples of the bank's CD loans include:

- The renewal of a \$1.5 million working capital line of credit to an organization providing basic needs, including housing and social services to low-income families; and
- A \$1.4 million loan providing construction and permanent financing for the construction of a new resident center in an apartment complex providing affordable housing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bangor MSA AA is consistent with the overall Outstanding performance under the Lending Test in the state of Maine. Performance in the Lewiston-Auburn AA is weaker than the overall Outstanding performance because of the lack of any community development lending in the AA.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of Maine section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Portland MSA AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 123 qualified investments totaling \$35.9 million. Additionally, nine prior period investments totaling \$15.2 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 25.2 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made eight LIHTC investments totaling \$27.1 million, one SBIC investment totaling \$654.9 thousand, and three mortgage-backed security pool investments totaling \$5.5 million. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority

of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, asset building, food, and shelter.

Examples of qualified investments in this AA include:

- TDBNA provided \$4.6 million of LIHTC equity to fund the new construction of a three-story building in Portland, Maine. The project provides 30 units of supportive housing for chronically homeless individuals using the “Housing First” approach. All units are subsidized by a HUD Section 8 HAP contract and restricted to residents with income at or below 60 percent of the AMI. There will be 24-hour on-site support services for the residents, and the staff will work with the residents to develop plans for improving independent living skills such as budgeting, vocational or educational goals, and treatment for mental illness;
- A \$2.3 million LIHTC investment to fund the acquisition and renovation of an existing, fully occupied 32-unit senior affordable housing complex in Saco, Maine;
- Grants totaling \$27.5 thousand to a nonprofit organization that helps low-income parents cover the cost of child care during the loss of a job or to maintain a job or enrollment in school;
- Grants totaling \$10 thousand to an organization to support small business workshops for new and existing entrepreneurs; and
- Grants totaling \$27.5 thousand to a nonprofit organization that provides financial literacy and helps new immigrants build basic banking and budgeting skills and to set and meet financial goals, as well as build, maintain, and repair credit.

Non-MSA Maine AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 56 qualified investments totaling \$8.4 million. Additionally, six prior period investments totaling \$8.2 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represent 18.7 percent of tier one capital allocated to this AA.

The bank’s responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made one LIHTC investment totaling \$4.1 million, and 10 mortgage-back security pool investments totaling \$3.9 million. A substantial majority of the dollar volume of the bank’s current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, asset building, food, and shelter.

Examples of qualified investments in this AA include:

- TDBNA provided \$4.1 million in LIHTC equity to fund the construction of 21 units of affordable housing for low-income veterans. Nine units are restricted to residents with income at or below 50 percent of the AMI, and 12-units are restricted to residents with income at or below 60 percent of the AMI. Sixteen units are set aside for homeless or at risk of being homeless veterans and their families. The homeless units benefit from a 25-year project-based Veterans Affairs Supportive Housing (VASH) voucher, where the tenant pays 30 percent of their income toward rent and the balance of the rent is paid by the voucher. The project is located on the campus of Veterans Affairs Medical Center in Chelsea, Maine. This project was also a recipient of a \$100 thousand grant; and
- Grants totaling \$90 thousand to a local food bank that collects and distributes food for hundreds of food pantries, meal sites, senior citizens, schools, and other community programs that feed and nourish those in need.

Statewide

TDBNA has five prior period statewide investments totaling \$1.9 million that remain outstanding and provide continuing benefit to the AA and three current period statewide investments totaling \$1.9 million. TDBNA also has \$50 thousand in unfunded commitments.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Bangor and Lewiston AAs is not inconsistent with the bank's overall outstanding performance under the Investment Test in the state of Maine. Performance in the limited-scope AA did not significantly affect the Investment Test rating for the state of Maine. Refer to the Table 14 in the state of Maine section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the state of Maine section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Portland MSA AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.

- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. While the bank did not have any branches or ATMs in low-income areas, the distribution of branches exceeds the distribution of population in moderate-income geographies and less than three percent of the population reside in low-income geographies within the AA.
- The 2015 US Census ACS update had an impact on the geographic distribution of branches within the AA due to the redesignation of the income level of the geographies, not due to a change in the branch physical location. Specifically, while the number of branches in moderate-income geographies changed from three to eight, the number of branches in low-income geographies went from two to zero.
- Additionally, the bank operated two branches in urban middle-income areas that were in the same neighborhood as moderate-income geographies. One of these branches was directly adjacent to (across the street from) a moderate-income geography. The other branch was along public transit lines or in a central business district that serves the entire community. These branches helped to expand access to bank products and services to these LMI geographies.
- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of services across the community. As evidenced by the table, one branch was closed in a middle-income area. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Non-MSA Maine AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had a significant number of branches and ATMs, as reflected in Table 15, in moderate-income areas compared to the population distribution. The AA does not have any low-income CTs.
- Additionally, the bank operated one branch in an urban middle-income area that was in the same neighborhood as a moderate-income geography. This branch was along public transit lines or in a central business district that serves the entire community. This branch helped to expand access to bank products and services to the moderate-income geography.

- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, two branches were closed in middle-income areas. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Portland MSA AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is excellent.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 90 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 74 financial education events totaling 224 hours. Twenty-seven of these events were homebuyer, 23 were financial literacy, and 24 were small business classes. A total of 1,449 participants attended these events, including 1,242 individuals and 207 small business owners. These events addressed an identified CD need in the area, namely financial education programs for individuals and small business owners.
- In addition to financial education classes, bank employees provided 1,056 hours in assistance to 31 qualifying organizations in the AA. This assistance was provided through board or committee membership, or volunteering technical expertise.

Non-MSA Maine AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is good.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 29 bank employees either provided financial literacy training to LMI

individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties. These employees account for just over one quarter of bank employees in the AA.

- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 78 financial education events totaling 203 hours. Thirty-one of these events were homebuyer, nine were financial literacy, and 38 were small business classes. A total of 754 participants attended these events, including 547 individuals and 207 small business owners. These events addressed an identified CD need in the area, namely financial education programs for individuals and small business owners.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Bangor MSA AA and Lewiston MSA AA is consistent with the bank's overall Outstanding performance under the Service Test in Maine. This performance provided further support for the state rating. Refer to Table 15 in the state of Maine section of Appendix D for the facts and data that support these conclusions.

State of Maryland

CRA Rating for Maryland¹¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is adequate, based upon excellent home mortgage lending and poor small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is excellent, based upon good home mortgage and excellent small business lending .
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are accessible to geographies and individuals of different income levels. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community it operated in.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Maryland

TDBNA has delineated a single AA in the state, the Baltimore-Columbia-Towson MSA (Baltimore MSA AA). The area includes Anne Arundel, Baltimore, Harford, and Howard counties and Baltimore City. The bank's operations in other parts of Maryland are included in the Washington MMSA and not included within this state-level analysis. TDBNA reported \$255.2 million in deposits or 0.2 percent of adjusted deposits within the state. As of June 30, 2017, TDBNA ranked thirteenth in the state with a deposit market share of 1.1 percent; however, this ranking is misleading as it includes deposits attributable to Washington MMSA. Major competitors in the AA include Bank of America, N.A., Manufacturers and Traders Trust Company, PNC Bank, N.A., and Wells Fargo Bank, N.A., with deposit market shares of 27.9 percent, 21.6 percent, 10.6 percent, and 9.9 percent, respectively. Banking competition is

¹¹ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

strong with 95 FDIC-insured depository institutions in the State of Maryland. TDBNA has a modest presence in the state with seven branches and 10 deposit-taking ATMs. During the evaluation period, TDBNA made 1.0 percent of their HMDA loans and 0.4 percent of their small business loans within the state.

Refer to the community profiles for Maryland in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Maryland

The Baltimore MSA AA was selected for a full scope review.

Two community contacts were performed in the state related to this evaluation. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MARYLAND

LENDING TEST

Lending Activity

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage lending and small business lending are weaker than its deposit market share and ranking. The bank has a limited presence in the MSA that is consistent with a secondary market. The bank has the 17th largest branch network in the MSA consisting of seven branches. There is strong competition in the MSA for deposits and loans. Large shares of the deposit and loan markets are concentrated between limited numbers of institutions. These market conditions within the MSA, combined with the bank's limited presence, have created constraints on the bank's ability to originate larger volumes of loans and achieve additional deposit growth.

TDBNA has a deposit market share of 0.4 percent and has the 25th market ranking out of 56 deposit-taking institutions. The bank's market ranking places it within the 44th percentile of depository institutions. The five largest institutions, based upon deposit market share, hold 77.0 percent of the deposit market.

The bank has a market share of 0.4 percent for mortgage lending and has the 72nd market ranking out of 618 lenders in the MSA. The market for loans is very competitive and the competition consists of local and national lenders of varying sizes, including national megabanks. The five largest mortgage lenders have captured 20.0 percent of the market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the 11th percentile of all mortgage lenders in the MSA.

The bank has a market share of 0.2 percent for small business lending and is the 30th-ranked lender out of 143 lenders. The market has strong competition for small business loans. The competition includes both national and local lenders of different sizes. The market also includes national issuers of small business credit cards. The five largest lenders have captured 60.0 percent of the small business lending market. Comparing TDBNA's market ranking for small business lending to the number of lenders in the market, the bank is in the 20th percentile for small business lenders.

The bank's mortgage and small business market shares and rankings are weaker than its deposit market share and ranking. Comparing the bank's percentile rankings within its respective markets considers the bank's competition for deposits and loans and results in a more accurate assessment of the bank's lending performance. The bank's lending performance is comparable to its deposit base and the level and nature of competition in the MSA with the bank in the 44th percentile for deposits compared to its position in the 11th percentile for mortgage lending and 20th percentile for small business lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in both geographies, and also stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is poor.

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low- and moderate-income geographies is poor. The proportion of loans was weaker than the proportion of businesses in low- and moderate-income geographies. The proportion of small loans to businesses in low-income geographies was somewhat weaker and in moderate-income geographies weaker than the aggregate distribution of loans in those geographies.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered adequate. Performance is stronger because the proportion of loans was somewhat weaker than the proportion of small businesses and was near to the aggregate distribution of loans to those businesses. The bank's adequate performance

had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good.

- The distribution of the bank's home mortgage lending during the 2014–2016 evaluation period is good. The proportion of loans was somewhat weaker than the proportion of low-income families and stronger than the proportion of moderate-income families. The bank's proportion of lending is significantly stronger than the aggregate distribution of loans to low-income borrowers, and stronger than the aggregate distribution of loans to moderate-income borrowers.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans exceeded the proportion of low- and moderate-income families and is stronger than the aggregate distribution of loans to low- and moderate-income families. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is excellent.

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is excellent. The proportion of loans was near to the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The significant majority (93.5 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Community Development Lending

Refer to Table 1 in the state of Maryland section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

TDBNA's CD lending performance in the Baltimore MSA AA is excellent, and has a significantly positive impact on overall lending performance in the AA. During the evaluation period, the bank originated 22 loans totaling \$111.4 million, representing 441.4 percent of allocated tier one capital. The majority of the bank's CD loans supported the revitalization and stabilization of low- and moderate-income areas. Additional CD loans supported development and retention of affordable housing. Specific examples of the bank's CD loans include:

- Participation in a construction loan to clean up, redevelop, and revitalize a former industrial site into mixed-use property. TDBNA's participation amount is \$37.5 million with the full amount advanced currently. The project involves state and brownfield clean-up program tax credits;
- A \$12.8 million loan to renovate a vacant building into a medical office building located within an enterprise zone. The enterprise zone is focusing on job creation and investments in the area; and
- A \$5 million non-revolving line of credit extended to a CDFI to make loans to developers of affordable housing.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of Maryland section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 46 qualified investments totaling \$47.5 million. Additionally, four prior period investments totaling \$8.3 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents over 200.0 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. TDBNA's current period investments are comprised entirely of LIHTCs, which focus on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, asset building, food, and shelter.

Examples of qualified investments in this AA include:

- TDBNA provided \$4.4 million of LIHTC equity to fund the redevelopment of an affordable housing project in the Oliver neighborhood of East Baltimore, an area that has long suffered from vacancy rates and neglect. The project is part of a neighborhood revitalization plan and received the United States of America Housing and Urban Development Secretary's Award for Excellence in Historic Preservation (July 2017). This rehabilitation project transformed and stabilized a neighborhood by creating

122 units of affordable housing through the rehabilitation of city-owned row houses as well as new construction. All of the units are for households with income at or below 80 percent of the AMI. Additionally, TDBNA provided a number of grants to CD organizations in the area to further assist the area;

- A \$13.7 million LIHTC investment to fund the preservation and rehabilitation of 284 units of largely Section 8 housing in Owings Mills, Maryland;
- TDBNA provided \$11.8 million of LIHTC equity to fund the purchase and rehabilitation of 201 units of affordable housing for LMI individuals and families. This was a collaborative effort with the Housing Authority of the City of Baltimore;
- A \$100 thousand grant was provided for the transformation of a dilapidated Baltimore City School into a vibrant 35-unit affordable housing complex. In addition to providing safe and supportive housing for homeless families with two or more children, the facility offers case management, mental health counseling, and referrals to needed services such as substance abuse treatment, adult education, and job training; and
- Grants totaling \$45 thousand to a community development corporation that promotes homeownership and provides homebuyer education workshops and information sessions for LMI home buyers.

Statewide

TDBNA has three current period statewide investments totaling \$48.1 million.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is good.

- Delivery systems are accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. During the evaluation period the bank had a limited presence in the AA with seven branches. While the bank did not have any branches or ATMs in moderate-income areas, there was a sufficient number of branches and ATMs, as reflected in Table 15, in low-income areas compared to the population distribution.
- Additionally, the bank operated two branches in urban middle-income areas that were in the same neighborhood as moderate-income geographies. Both of these branches were

directly adjacent to a moderate-income geography. These branches helped to expand access to bank products and services to these moderate-income geographies.

- The 2015 US Census ACS update had an impact on the geographic distribution of branches within the AA due to the redesignation of the income level of the geographies, not due to a change in the branch physical location. Specifically, while the number of branches in low-income geographies changed from zero to one, the number of branches in moderate-income geographies went from one to zero.
- The opening and closing of branches, reflected in Table 15, had a somewhat limited impact on the delivery of service across the community. As evidenced by the table, one branch was opened in a moderate-income area. This opening occurred prior to the 2015 US Census ACS update, which resulted in a change to the income classification for the geography where this branch is located.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is good.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 29 bank employees either provided financial literacy training to LMI individuals or small business owners or held board or committee positions with qualifying organizations. These employees account for nearly one half of the bank's employees in the AA.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 57 financial education events totaling 249 hours. Twenty-five of these events were homebuyer, four were financial literacy, and 28 were small business classes. A total of 1,101 participants attended these events, including 596 individuals and 505 small business owners. These events addressed an identified CD need in the area, namely financial literacy education.

State of Massachusetts

CRA Rating for Massachusetts¹²: Outstanding

The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is excellent, based upon excellent home mortgage and small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage and good small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are readily accessible to geographies and individuals of different income levels. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the communities in which it operated.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Massachusetts

TDBNA has delineated five AAs within the state of Massachusetts. These include four in MSAs and one in a non-MSA area. Specifically, the AAs include the complete MSAs of: Barnstable; Pittsfield; Springfield; and Worcester; and the non-MSA Massachusetts AA consisting of Franklin County. TDBNA reported \$4.8 billion in deposits or 3.2 percent of adjusted deposits within the state. As of June 30, 2017, TDBNA ranked fifth in the state with a

¹² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

deposit market share of 3.9 percent. Major banking competitors include State Street Bank and Trust Co., Bank of America, N.A., Citizens Bank, N.A., and Santander, N.A., with deposit market shares of 22.6 percent, 20.9 percent, 10.5 percent, and 5.1 percent, respectively. Banking competition is very strong with 158 FDIC-insured depository institutions in the state of Massachusetts. TDBNA has an established presence in the state with 53 branches and 90 deposit-taking ATMs. During the evaluation period, TDBNA made 3.2 percent of their HMDA loans and 2.7 percent of their small business loans within the state.

Refer to the community profiles for Massachusetts in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Massachusetts

The Springfield and Worcester MSA AAs were selected for full scope reviews. The Springfield MSA AA accounts for 34.7 percent of deposits; 35.9 percent of the branches; 36.3 percent of HMDA lending; and 31.1 percent of small business lending in the state; and the Worcester MSA AA accounts for 30.6 percent of deposits; 26.4 percent of the branches; 13.2 percent of HMDA lending; and 34.3 percent of small business lending in the state.

Three community contacts were performed in the state related to this evaluation; two in the Springfield MSA and one in the Worcester MSA. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MASSACHUSETTS

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

Springfield MSA AA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage lending and small business loans are weaker than its deposit market share and ranking. The Springfield MSA AA is a smaller market consisting of only 20 depository institutions. The bank has the second-largest deposit market share and the third-largest branch network. The market consists primarily of large depository institutions with 16 having total deposits exceeding \$1 billion. Additionally, nine of the institutions have branch networks consisting of ten or more branches, and the largest

network consists of 21 branches. The smaller market consisting primarily of larger institutions creates a very competitive market for TDBNA and the other institutions.

TDBNA has a deposit market share of 11.3 percent, resulting in a market ranking of second out of 20 deposit-taking institutions. The bank's market ranking places it in the tenth percentile of depository institutions. The five largest institutions, including TDBNA, hold 53.0 percent of the deposit market.

The bank has a mortgage lending market share of 1.8 percent and is the 20th-ranked lender out of 353 lenders in the MSA. The market for loans is very competitive and the competition consists of local and national lenders of differing sizes, including megabanks. The five largest lenders hold 18.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the fifth percentile of all mortgage lenders in the MSA.

TDBNA has 3.0 percent of the small business lending market and is the ninth-ranked lender out of 108 lenders. The market consists of national and local lenders of different sizes, including megabanks and national issuers of small business credit cards. Competition for loans is very strong in the MSA. The five largest small business lenders have captured 60.0 percent of the market. Comparing TDBNA's market ranking for small business lending to the number of lenders in the market, the bank is in the eighth percentile for small business lenders.

TDBNA's mortgage and small business market shares and rankings are weaker than its deposit market share and ranking. Comparing the bank's lending performance to its deposit base, as percentile rankings, incorporates the volume and nature of the bank's competition into the performance evaluation. The bank's lending performance, measured as a percentile ranking, is comparable to the deposit base. TDBNA's deposit base, as a percentile ranking, is in the tenth percentile while mortgage lending is in the fifth percentile and small business lending is in the eighth percentile. The bank's lending activity performance is adequate.

Worcester MSA AA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is good. The bank originated a significant volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage lending and small business loans are weaker than its deposit market share and ranking. The Worcester MSA AA has several similarities with the Springfield MSA AA. The market is a smaller market with only 39 depository institutions. TDBNA has the second-largest deposit market share and the third-largest branch network. The Worcester market is a small market but has two primary groupings of competitors – one group consisting of 16 institutions with total deposits (including offices outside of the Worcester market) in excess of \$1 billion (including TDBNA), and one group consisting of 17 institutions with total deposits (including outside of the Worcester market) of less than \$500 million (the remaining population having deposits between \$500 million and \$1 billion). In addition, a group of nine institutions have branch networks consisting of ten or more branches, with the largest network consisting of 26 branches. The smaller

market consisting of groups of institutions with common characteristics creates a very competitive market for TDBNA and the other institutions.

TDBNA has a deposit market share of 8.8 percent, resulting in a market ranking of second out of 39 deposit-taking institutions. The bank's market ranking places it in the fifth percentile of depository institutions. The five largest institutions, including TDBNA, hold 47.0 percent of the deposit market.

The bank has a share of 1.1 percent of the mortgage lending market and is the 20th-ranked lender out of 477 lenders in the MSA. The market for loans is very competitive and the competition consists of national and local lenders of varying sizes, including megabanks. The five largest lenders have captured 20.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the fourth percentile of mortgage lenders in the MSA.

The bank has a market share of 3.0 percent for small business lending and is the ninth-ranked lender out of 108 lenders. The market consists of national and local lenders of different sizes, including large issuers of small business credit cards. Competition for loans is very strong in the MSA. The five largest lenders have captured 60.0 percent of the small business lending market. Comparing TDBNA's small business lending market ranking to the number of lenders in the market, the bank is in the eighth percentile for small business lenders.

TDBNA's mortgage and small business market shares and rankings are weaker than its deposit market share and ranking. Comparing the bank's lending performance to its deposit base, as percentile rankings, incorporates the volume and nature of the bank's competition into the performance evaluation. The bank's lending performance, measured as a percentile ranking, exceeds deposits. TDBNA's deposit base, as a percentile ranking, is in the fifth percentile, while mortgage lending is in the fourth percentile and small business lending is in the eighth percentile. The bank's lending activity performance is good.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

Springfield MSA AA

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in both geographies, and also stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Worcester MSA AA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was significantly stronger than the proportion of owner-occupied housing units in both geographies, and also significantly stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is excellent.

Springfield MSA AA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low-income geographies is adequate and the distribution in moderate-income geographies is excellent. The proportion of loans was somewhat weaker than the proportion of businesses in low-income geographies, and near to the proportion in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was near to the aggregate distribution of loans in those geographies, and stronger than the aggregate distribution of loans in moderate-income geographies. Performance in the 2017 evaluation period is consistent with the overall good performance..

Worcester MSA AA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of businesses in low- and moderate-income geographies. The proportion of small loans to businesses in low- and moderate-income geographies was stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good.

Springfield MSA AA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending to low-income borrowers is adequate, and excellent to moderate-income borrowers. The proportion of loans was somewhat weaker than the proportion of low-income borrowers, and significantly stronger than moderate-income borrowers. The proportion of

mortgage loans was significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Worcester MSA AA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending to low-income borrowers is adequate, and excellent to moderate-income borrowers. The proportion of loans was somewhat weaker than the proportion of low-income borrowers, and stronger than moderate-income borrowers. The proportion of mortgage loans was significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

Springfield MSA AA

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was somewhat weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. Additionally, the bank made a significant majority (92.3 percent) of its business loans in amounts of \$100 thousand or less, and addressed an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans exceeded the proportion of small businesses and exceeded the aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Worcester MSA AA

- The distribution of the bank's small loans to businesses during the 2014–2016 evaluation period is good. The proportion of loans was weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The majority (89.4 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans exceeded the proportion of small businesses and exceeded the aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our

evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Community Development Lending

Refer to Table 1 in the state of Massachusetts section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

Springfield MSA AA

The bank's CD lending in the Springfield MSA AA is excellent, and has significantly positive impact on lending performance in the AA. The bank originated 24 CD loans totaling \$87.6 million during the evaluation period. CD lending in the Springfield MSA AA represents 53.4 percent of allocated tier one capital. TDBNA's CD lending effectively helps meet community credit needs. The significant majority of the bank's CD lending supports the development and retention of affordable housing. Other CD loans support economic development and the revitalization and stabilization of low- and moderate-income areas. Additional loans support organizations providing community services to LMI individuals and families. Some examples of the bank's CD loans include:

- A \$16.8 million construction loan funding the rehabilitation of an existing public housing development. The development consists of 88 units of affordable housing (LIHTC project);
- A \$12.3 million tax-exempt loan funding the rehabilitation of 75 units of affordable housing. All of the housing units are income-qualified for LMI individuals and families (LIHTC project);
- An \$11.7 million loan for the acquisition and conversion of a former school into affordable housing; and
- A \$4.1 million loan for the construction of an office building for an organization providing services to individuals dealing with mental illness, developmental disability or autism, brain injury, or addiction issues. The majority of the organization's clients receive Medicaid.

Worcester MSA AA

The bank's CD lending in the Worcester MSA AA is excellent, and has a significantly positive impact on its overall lending performance in the AA. TDBNA originated 23 CD loans totaling \$84.2 million during the evaluation period. The bank's CD lending represents 58.2 percent of allocated tier one capital. The bank effectively helps meet community credit needs through its CD lending. The bank's CD lending supported the development and retention of affordable housing and organizations providing community services. Specific examples of the bank's CD loans include:

- A \$15 million tax-exempt construction loan for the acquisition and rehabilitation of 132 units of affordable housing. The substantial majority, 120 of the 132 units, are income-qualified and affordable (LIHTC project); and
- A \$12.8 million construction loan to develop 55 units of affordable housing (LIHTC and HTC project).

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Barnstable and Pittsfield MSA AAs, and the Massachusetts non-MSA AA is consistent with the overall Outstanding performance under the Lending Test in the state of Massachusetts.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of Massachusetts section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Springfield MSA AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 92 qualified investments totaling \$32.1 million. Additionally, 12 prior period investments totaling \$18.2 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 30.7 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made four LIHTC investments totaling \$21.4 million and nine mortgage-backed security pool investments totaling \$8 million. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, asset building, food, and shelter.

Examples of qualified investments in this AA include:

- A \$6.3 million LIHTC investment and a \$1.2 million state housing tax credit investment to fund the rehabilitation of a 41-unit affordable housing apartment complex in Chicopee, Massachusetts. Rents for 25 units are restricted to tenants with income at or below 60 percent of the AMI. Rents for 16 units are restricted to tenants with income at or below 30 percent of the AMI, with eight units supported by a project-based Massachusetts Rental Voucher Program subsidy contract, and the other eight supported by a project-based Section 8 HAP subsidy contract;

- A \$10.8 million LIHTC investment and a \$3 million state housing tax credit investment to fund the development of a former lumberyard into a 70 thousand square foot development that includes 55 units of affordable housing for LMI individuals and families and 5,400 square feet of commercial space. Funding came from multiple sources, including the City of Northampton and the state Department of Housing and Community Development;
- Grants totaling \$45 thousand to a local community loan fund and nonprofit organization that provides small and emerging businesses and low-income business owners in western Massachusetts with access to affordable financing. The organization also provides business assistance to loan recipients, entrepreneurs, and existing business owners; and
- Grants totaling \$45 thousand to a nonprofit organization that provides homebuyer education and coaching services to LMI individuals and families, including members of minority groups and others who have traditionally faced barriers to homeownership. The organization's programs help families and individuals achieve the dream of homeownership and ensure that participants become successful homeowners.

Worcester MSA AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 82 qualified investments totaling \$20.9 million. Additionally, 10 prior period investments totaling \$18.4 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 27.2 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made one LIHTC totaling \$6.1 million and five mortgage-backed security pool investments totaling \$10.7 million. A substantial majority of the dollar volume of the bank's current and prior period investments focus on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, asset building, food, and shelter.

Examples of qualified investments in this AA include:

- TDBNA provided \$6.1 million in LIHTC equity to fund the rehabilitation of an eight-story building in Gardner, Massachusetts. The project preserved 134 units of affordable housing for seniors and is restricted to seniors with income at or below 60 percent of the AMI. All 134 units benefit from a project-based Section 8 HAP subsidy contract;
- A \$100 thousand grant to a community development corporation to support two different affordable housing projects. One is a preservation and rehabilitation project that includes energy efficient improvements for 27 existing affordable housing units owned

by the CDC. The second project is the creation of eight new affordable rental units in an abandoned, fire-damaged property;

- A \$100 thousand grant to preserve and improve 14 units of affordable housing that had gone into foreclosure. The project includes improvements to HVAC systems, adding insulation, replacing kitchens and bathrooms, and making the buildings accessible; and
- A \$25 thousand grant to a nonprofit organization whose mission is to revitalize struggling areas of Worcester, Massachusetts. The grants were to support an entrepreneur and finance boot camp, which seeks to increase the financial literacy, entrepreneurship skills, and networking opportunities for LMI individuals and unemployed individuals.

Statewide

TDBNA has four prior period statewide investments totaling \$2.8 million that remain outstanding and provide continuing benefit to the AA and two current period statewide investments totaling \$2.2 million.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Barnstable Town and Pittsfield MSA AAs, and non-MSA Massachusetts AAs is not inconsistent with the bank's overall Outstanding performance under the Investment Test in the state of Massachusetts. Performance in the limited-scope AAs did not significantly affect the Investment Test rating for the state of Massachusetts. Refer to the Table 14 in the state of Massachusetts section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the state of Massachusetts section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Springfield MSA AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.

- The bank’s branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had a significant number of branches and ATMs, as reflected in Table 15, in LMI areas compared to the population distribution.
- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, the bank closed two branches in middle-income geographies. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Worcester MSA AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank’s retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank’s branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had a significant number of branches and ATMs, as reflected in Table 15, in LMI areas compared to the population distribution.
- The bank did not have any branch openings or closings during the evaluation period.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Springfield MSA AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is good.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 29 bank employees either provided financial literacy training to LMI individuals or small business owners or held board or committee positions with qualifying organizations.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals

(including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 75 financial education events totaling 306 hours. Thirty-one of these events were homebuyer, 20 were financial literacy, and 24 were small business classes. A total of 1,778 participants attended these events, including 1,585 individuals and 193 small business owners. These events addressed an identified CD need in the area, namely expanding financial education programs to LMI individuals.

- In addition to financial education classes, bank employees provided 189 hours in assistance to nine qualifying organizations in the AA. This assistance was provided through board or committee membership.

Worcester MSA AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is adequate.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 16 bank employees either provided financial literacy training to LMI individuals or small business owners or held board or committee positions with qualifying organizations.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 59 financial education events totaling 146 hours. Twenty-three of these events were homebuyer, 20 were financial literacy, and 16 were small business classes. A total of 572 participants attended these events, including 442 individuals and 130 small business owners. These events addressed an identified CD need in the area, namely expanding financial education to LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Barnstable MSA AA is consistent with the bank's overall Outstanding performance under the Service Test in Massachusetts. Performance in the Pittsfield MSA AA and non-MSA Massachusetts AA is somewhat weaker than the bank's overall performance in the state, and is considered good. Weaker performance is due to the bank's very limited presence in these AAs, and did not impact conclusions about the bank's performance in the state. Refer to Table 15 in the state of Massachusetts section of Appendix D for the facts and data that support these conclusions.

State of New Hampshire

CRA Rating for New Hampshire¹³: Outstanding

The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is excellent, based upon excellent home mortgage lending and good small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage and small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are readily accessible to geographies and individuals of different income levels. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the communities in which it operated.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in New Hampshire

TDBNA has delineated two AAs within the state. They include the Manchester-Nashua MSA AA and the non-MSA New Hampshire AA which consists of the counties of Belknap; Carroll; Cheshire; Grafton; Merrimack; and Sullivan. The bank's other operations in the State of New Hampshire were evaluated as part of the Boston MMSA. TDBNA reported \$4.4 billion in deposits or 3.0 percent of adjusted deposits. As of June 30, 2017, TDBNA ranked second in the state with a deposit market share of 21.6 percent; however this includes deposits attributable to the Boston MMSA. Major banking competitors include Citizens Bank, N.A., Bank of America, N.A., and Peoples United Bank, N.A., with deposit market shares of 23.2

¹³ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

percent, 14.6 percent, and 4.9 percent, respectively. Banking competition is moderate with 42 FDIC-insured depository institutions in the State of New Hampshire. TDBNA has an established presence in the state with 41 branches and 51 deposit-taking ATMs. During the evaluation period, TDBNA made 3.3 percent of their HMDA loans and 2.6 percent of their small business loans within the state.

Refer to the community profiles for New Hampshire in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New Hampshire

Both of the bank's designated AAs in the state were selected for full scope reviews. The Manchester MSA AA accounts for 47.3 percent of deposits; 53.7 percent of the branches; 40.4 percent of HMDA lending; and 53.0 percent of small business lending in the state; and the non-MSA New Hampshire AA accounts for 52.7 percent of deposits; 46.3 percent of the branches; 59.6 percent of HMDA lending; and 47.0 percent of small business lending in the state.

Two community contacts were performed in the state related to this evaluation; one each within the two full-scope areas. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW HAMPSHIRE

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

Manchester MSA AA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is good. The bank originated a significant volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares and rankings for mortgage lending and small business lending are weaker than its deposit market share and ranking. TDBNA has a large presence in the Manchester MSA AA. The bank has the third-largest deposit market share and the second-largest branch network in the AA. The AA is a small market consisting of 21 depository institutions with branches in the market. Of those 21 institutions, 12 have national or large regional footprints and total deposits exceeding \$1 billion, including TDBNA. Additionally, 89.0 percent of the deposits in the MSA are concentrated in five institutions, including TDBNA.

TDBNA has a deposit market share of 19.9 percent, resulting in a market ranking of third out of 21 deposit-taking institutions. The bank's market ranking places it in the 14th percentile of depository institutions.

The bank has a mortgage lending market share of 1.8 percent and is the 14th-ranked lender out of 355 lenders in the MSA. The market is very competitive and consists of a significant number of competitors, both local and national in scope, including some of the largest institutions in the country. The five largest lenders hold 28.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the third percentile of all mortgage lenders in the MSA.

TDBNA has a market share of 7.8 percent in the small business lending market and is the fifth-ranked lender out of 86 lenders. The market consists of national and local lenders of different sizes, including megabanks and national issuers of small business credit cards. Competition for loans is very strong in the MSA. The five largest small business lenders, including TDBNA, have captured 58.0 percent of the market. Comparing TDBNA's market ranking for small business lending to the number of lenders in the market, the bank is in the first percentile for small business lenders.

TDBNA's mortgage and small business market shares and rankings are weaker than its deposit market share and ranking. Comparing the bank's lending performance to its deposit base, as percentile rankings, incorporates the volume and nature of the bank's competition into the performance evaluation. The bank's lending performance, measured as a percentile ranking, is comparable to the deposit base. TDBNA's deposit base, as a percentile ranking, is in the 14th percentile while mortgage lending is in the third percentile and small business lending is in the fifth percentile.

New Hampshire Non-MSA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage lending and small business loans are weaker than its deposit market share and ranking. Similar to the Manchester market, the New Hampshire non-MSA AA is a small market, consisting of only 24 depository institutions. TDBNA has the largest deposit market share and the second-largest branch network. The market also has a significant share of the deposit market concentrated in five institutions, including TDBNA. The five largest institutions have captured 55.0 percent of the deposit market. The New Hampshire non-MSA also has a large number of institutions, relative to the size of the market, with total deposits exceeding \$1 billion. There are 11 institutions with deposits exceeding \$1 billion. The small market, with a relatively-significant number of large institutions and a large percentage of the deposit market concentrated among five institutions, creates a very competitive market for TDBNA and the other institutions.

TDBNA has a deposit market share of 19.5 percent, resulting in a market ranking of first out of 24 deposit-taking institutions. The bank's market ranking places it in the fourth percentile of depository institutions.

The bank has a market share of 2.2 percent for the mortgage lending market and is the 12th-ranked lender out of 393 lenders in the MSA. The market for loans is very competitive and the competition consists of national and local lenders of varying sizes, including megabanks. The five largest lenders have captured 25.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the third percentile of mortgage lenders in the MSA.

The bank has a market share of 6.4 percent for small business lending and is the fifth-ranked lender out of 97 lenders. The market consists of national, regional, and local lenders of different sizes, including large issuers of small business credit cards. Competition for loans is very strong in the MSA. The five largest lenders, including TDBNA, have captured 54.0 percent of the small business lending market. Comparing TDBNA's small business lending market ranking to the number of lenders in the market, the bank is in the fifth percentile for small business lenders.

TDBNA's mortgage and small business market shares and rankings are weaker than its deposit market share and ranking. Evaluating the bank's performance by comparing the bank's lending performance to its deposit base, as percentile rankings, incorporates the volume and nature of the bank's competition into the evaluation. The bank's lending performance, measured as a percentile ranking, is comparable to deposits. TDBNA's deposit base, as a percentile ranking, is in the fourth percentile while mortgage lending is in the third percentile and small business lending is in the fifth percentile. The bank's lending activity performance is adequate.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

Manchester MSA AA

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was near to the proportion of owner-occupied housing units in low-income geographies, and stronger than the proportion of owner-occupied housing in moderate-income geographies. The distribution of lending is near to the aggregate distribution of loans in the low-income geographies, and stronger than the distribution in the moderate-income geographies.. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

New Hampshire Non-MSA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending in moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in the moderate-income geographies, and also stronger than the aggregate distribution of loans in those geographies. There are no low-income geographies in the assessment area.
- The bank's performance in the 2017 evaluation period is weaker than the performance in the 2014-2016 period, and considered adequate. Performance is weaker because the bank's distribution is somewhat below the distribution of owner-occupied housing units in moderate-income geographies, and somewhat weaker than the aggregate distribution of loans in those geographies. The weaker performance in the 2017 evaluation period has minimal impact on overall assessment of Lending Test performance because the performance was evaluated over a significantly shorter period of time than the prior evaluation period.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is good.

Manchester MSA AA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low-income geographies is poor and the distribution in moderate-income geographies is good. The proportion of loans was weaker than the proportion of businesses in low-income geographies, and near to the proportion in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was somewhat weaker than the aggregate distribution of loans in those geographies, and near to the aggregate distribution of loans in moderate-income geographies. Performance in the 2017 evaluation period is consistent with the overall adequate performance..

New Hampshire Non-MSA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in moderate-income geographies is excellent. The proportion of loans was stronger than the proportion in moderate-income geographies. The proportion of small loans to businesses in moderate-income geographies was stronger than the aggregate distribution of loans in those geographies. There are no low-income geographies in the bank's defined assessment area.
- Performance in the 2017 evaluation period is weaker than the bank's performance in the 2014-2016 period, and considered good. Performance is weaker because the proportion of loans in moderate-income geographies is somewhat weaker than the proportion of businesses in moderate-income geographies, and near to the aggregate distribution of

loans in those geographies. The weaker performance in the 2017 evaluation period has minimal impact on the overall Lending Test performance because the performance was evaluated over a significantly shorter period of time than the prior evaluation period.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good.

Manchester MSA AA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending to low-income borrowers is adequate, and excellent to moderate-income borrowers. The proportion of loans was somewhat weaker than the proportion of low-income borrowers, and significantly stronger than moderate-income borrowers. The proportion of mortgage loans was significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. Performance in the 2017 evaluation period is consistent with the overall good performance.

New Hampshire Non-MSA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending to low-income borrowers is adequate, and excellent to moderate-income borrowers. The proportion of loans was somewhat weaker than the proportion of low-income borrowers, and stronger than moderate-income borrowers. The proportion of mortgage loans was significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. Performance in the 2017 evaluation period is consistent with the overall good performance.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

Manchester MSA

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. Additionally, a significant majority (92.6 percent) of the business loans were originated in amounts of \$100 thousand or less, and the bank was able to address an identified need in the community for business loans in smaller amounts. Performance in the 2017 evaluation period is consistent with the overall good performance..

New Hampshire Non-MSA

- The distribution of the bank's small loans to businesses during the 2014–2016 evaluation period is good. The proportion of loans was somewhat weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The significant majority (92.9 percent) of the bank's business loans are for \$100 thousand or less and the bank's lending addressed an identified need in the community for business loans in smaller amounts. Performance in the 2017 evaluation period is consistent with the overall good performance.

Community Development Lending

Refer to Table 1 in the state of New Hampshire section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

Manchester MSA AA

The bank's CD lending in the Manchester MSA AA is excellent, and has a significantly positive impact on overall lending performance in the AA. During the evaluation period, TDBNA originated 15 CD loans totaling \$32.6 million. CD lending in the Manchester MSA AA represents 15.9 percent of allocated tier one capital. The CD lending originated by the bank effectively helps meet community credit needs. The significant majority of the bank's CD lending supports organizations providing community services to LMI individuals and families. In addition, the bank made three CD loans supporting the development and retention of affordable housing. Some examples of the bank's CD loans include:

- A \$5.8 million tax-exempt loan to fund the acquisition of a building to house a community mental wellness center. The majority of the organization's revenue is from Medicaid;
- A \$4.8 million commercial real estate mortgage to finance the acquisition of eight properties: three multifamily rental housing properties, two duplexes, one mixed-use residential/office property, and lots to be used for complex parking. All of the residential units are affordable housing to LMI residents and all properties are located in LMI geographies; and
- A \$3.5 million tax exempt bond to support an organization providing services to developmentally-disabled individuals with acquired brain disorders. More than 92.0 percent of the organization's revenue is from Medicaid.

New Hampshire Non-MSA AA

TDBNA's CD lending in the New Hampshire non-MSA AA is excellent, and has a significantly positive impact on its overall lending performance in the AA. The bank originated ten CD loans totaling \$27.2 million during the evaluation period. The bank's CD lending represents 11.9

percent of allocated tier one capital. The CD loans originated by the bank effectively help meet community credit needs. The bank's CD lending primarily supported the development and retention of affordable housing. CD lending also supported organizations providing community services. The bank originated one additional loan supporting the revitalization and stabilization of LMI areas. Some of the bank's CD loans include:

- An \$8 million loan for the acquisition of a 241-lot manufactured housing development for LMI residents; and
- A \$5.9 million term loan for the design and construction of a building to serve as a second production site for a local manufacturer. The company helps revitalize the area by employing and training LMI workers.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of New Hampshire section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Manchester MSA AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 132 qualified investments totaling \$37 million. Additionally, seven prior period investments totaling \$21.8 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 28.6 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made two LIHTC investments totaling \$14 million and 22 mortgage-backed security pool investments totaling \$22 million. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, and asset building.

Examples of qualified investments in the AA include:

- A \$3.5 million LIHTC investment to fund the construction of a two-story building in Manchester, New Hampshire. The project provides 20 units of supportive housing for homeless persons or persons at risk of homelessness. Twelve units are restricted to families with income at or below 50 percent of the AMI, and eight units are restricted to families with income at or below 60 percent of the AMI. All units benefit from a 20 year Section 8 rental assistance subsidy;
- Grants totaling \$40 thousand to a nonprofit organization that provides both transitional housing and supportive services to LMI single mothers. The funds support the

organization's unique three-phase residential program for homeless women at 200 percent of poverty level and their children. The program provides affordable housing, supportive services, and mandatory participation in a higher education or job skills program to ensure financial independence will be obtained upon completion of the program; and

- Grants totaling \$45 thousand to a nonprofit organization that provides transitional housing as well as counseling and other supportive services to young adults exiting the child protective or juvenile justice system. Participants must be between 18 and 20 years of age, remained in care until "aging out" and qualify for low-income housing, as defined by HUD.

Non-MSA New Hampshire AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 90 qualified investments totaling \$32.4 million. Additionally, 11 prior period investments totaling \$18.8 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 22.3 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made two LIHTC investments totaling \$9.6 million, one New Market Tax Credit (NMTC) investment totaling \$2.9 million, and 36 mortgage-backed security pool investments totaling \$17.1 million. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, and asset building.

Examples of qualified investments in this AA include:

- TDBNA provided \$4 million in LIHTC equity to fund the construction of a 24-unit mixed-income housing development for seniors. Six units are restricted to seniors with income at or below 50 percent of the AMI, 16 units are restricted to seniors with income at or below 60 percent of the AMI, and two units are at market rate;
- Grants totaling \$35 thousand to support an organization that educates, supports, and assists in the successful development of entrepreneurs. The funds supported the "HIVE", an affordable, creative co-working space that serves entrepreneurs or employees with the option to work remotely as well as a program that provides an ongoing series of round table discussions on trends to help businesses cope with change and unpredictability; and
- Grants totaling \$20 thousand to support a dental clinic that provides dental care for teens, adults, and elderly patients that are low-income, uninsured, and Medicaid-insured.

Statewide

TDBNA has two prior period statewide investments totaling \$726.9 thousand that remain outstanding and provide continuing benefit to the AA and two current period statewide investments totaling \$951 thousand.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the state of New Hampshire section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Manchester MSA AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had a significant number of branches and ATMs, as reflected in Table 15, in LMI areas compared to the population distribution.
- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, one branch was closed in a middle-income area. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Non-MSA New Hampshire AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had a significant

number of branches and ATMs, as reflected in Table 15, in moderate-income areas compared to the population distribution. The AA does not have any low-income CTs.

- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, one branch was closed in a moderate-income area and two in middle-income areas. The moderate-income branch was closed due to low transaction volume. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels

Community Development Services

Manchester MSA AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is good.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 42 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 57 financial education events totaling 185 hours. Twenty-two of these events were homebuyer, one was financial literacy, and 34 were small business classes. A total of 556 participants attended these events, including 121 individuals and 435 small business owners. These events addressed an identified CD need in the area, namely financial education programs for small business owners.
- In addition to financial education classes, bank employees provided 224 hours in assistance to seven qualifying organizations in the AA. This assistance was provided mainly through board or committee membership, and also through volunteering technical expertise.

Non-MSA New Hampshire AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is good.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 31 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties. These employees account for nearly one quarter of the bank's employees in the AA.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 56 financial education events totaling 210 hours. Twenty-six of these events were homebuyer, three were financial literacy, and 27 were small business classes. A total of 456 participants attended these events, including 190 individuals and 266 small business owners. These events addressed an identified CD need in the area, namely financial education programs for small business owners.
- In addition to financial education classes, bank employees provided 242 hours in assistance to seven qualifying organizations in the AA. This assistance was provided through board or committee membership, and also through volunteering technical expertise.

State of New Jersey

CRA Rating for New Jersey¹⁴: High Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is good, based upon adequate home mortgage lending and good small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage and small business lending.
- The bank's adequate level of CD lending had a neutral impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are accessible to geographies and individuals of different income levels. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the communities in which it operated.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in New Jersey

TDBNA has delineated four AAs within the state of New Jersey. They are the complete MSAs of: Atlantic City-Hammonton; Ocean City; Trenton; and Vineland-Bridgeton (Vineland). The bank's other operations in the State of New Jersey are evaluated as part of either the Philadelphia MMSA or the New York MMSA. TDBNA reported \$3.0 billion in deposits or 2.1 percent of total adjusted deposits in the state of New Jersey. As of June 30, 2017, TDBNA ranked second in the state with a deposit market share of 12.0 percent; however, this ranking

¹⁴ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

includes significant deposits attributable to the Philadelphia and New York MMSAs. Major banking competitors include Bank of America, N.A., Wells Fargo Bank, N.A., and PNC Bank, N.A., with deposit market shares of 16.1 percent, 11.9 percent, and 9.1 percent, respectively. Banking competition is strong with 137 FDIC-insured depository institutions in the State of New Jersey. TDBNA has a moderate presence in the state with 25 branches and 40 deposit-taking ATMs. During the evaluation period, TDBNA made 2.4 percent of their HMDA loans and 2.2 percent of their small business loans within the state.

Refer to the community profiles for the New Jersey in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New Jersey

The Atlantic City-Hammonton (Atlantic City MSA AA) and the Trenton MSA AA were selected for full scope reviews. The Atlantic City MSA AA accounts for 36.0 percent of deposits; 32.0 percent of the branches; 32.3 percent of HMDA lending; and 37.8 percent of small business lending in the state; and the Trenton MSA AA accounts for 36.7 percent of deposits; 36.0 percent of the branches; 24.0 percent of HMDA lending; and 30.4 percent of small business lending in the state.

Three community contacts were performed in the state related to this evaluation; two in the Atlantic City MSA AA and one in the Trenton MSA AA. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW JERSEY

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

Atlantic City MSA AA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The bank's market shares and rankings for mortgage lending and small business lending are weaker than its deposit market share and ranking. TDBNA has a large presence in the Atlantic City MSA AA. The bank has the largest deposit market share and the fourth-largest branch network in the AA. The AA is a very small market, based upon the number of institutions competing for deposits, consisting of 14 depository institutions with branches in the market. Of those 14 institutions, nine have national or large regional footprints and total deposits

exceeding \$1 billion, including TDBNA. Additionally, 76.0 percent of the deposits in the MSA are concentrated in five institutions, including TDBNA. The presence of large institutions in a small market, combined with a significant concentration of deposits held by five of the large institutions, results in a highly competitive market for deposits and loans for TDBNA and the other institutions in the Atlantic City MSA AA.

TDBNA has a deposit market share of 20.5 percent, resulting in a market ranking of first out of 14 deposit-taking institutions. The bank's market ranking places it in the seventh percentile of depository institutions.

The bank has a mortgage lending market share of 2.8 percent and is the seventh-ranked lender out of 397 lenders in the MSA. The market is very competitive. It consists of a significant number of competitors, both local and national in scope, including some of the largest institutions in the country. The five largest lenders hold 25.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the first percentile of all mortgage lenders in the MSA.

TDBNA has a market share of 3.9 percent in the small business lending market and is the eighth-ranked lender out of 83 lenders. The market consists of national, regional, and local lenders of varying sizes, including megabanks and national issuers of small business credit cards. Competition for loans is very strong in the MSA. The five largest small business lenders have captured 51.0 percent of the market. Comparing TDBNA's market ranking for small business lending to the number of lenders in the market, the bank is in the ninth percentile for small business lenders.

TDBNA's mortgage and small business market shares and rankings are weaker than its deposit market share and ranking. Comparing the bank's lending performance to its deposit base, as percentile rankings, incorporates the volume and nature of the bank's competition into the performance evaluation. The bank's lending performance, measured as a percentile ranking, is comparable to the deposit base. TDBNA's deposit base, as a percentile ranking, is in the seventh percentile while mortgage lending is in the first percentile and small business lending is in the ninth percentile. The bank's lending activity performance is comparable to the deposit base and lending activity is adequate.

Trenton MSA AA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage lending and small business loans are somewhat weaker than its deposit market share and ranking. The Trenton MSA AA is a small market, consisting of only 25 depository institutions. TDBNA has the fourth-largest deposit market share and the seventh-largest branch network. The Trenton market represents a secondary market for the bank with its network of nine branches. The market also has a significant share of the deposit market concentrated in five institutions, including TDBNA. The five largest institutions have captured 65.0 percent of the deposit market. The Trenton MSA

AA also has a significant concentration of large institutions within the market. Of the 25 in the market, 19 institutions have total deposits exceeding \$1 billion. The small market, with a concentration of large institutions and a large percentage of the deposit market concentrated among five institutions, creates a very competitive market for TDBNA and the other institutions. Trenton will also be a challenge for TDBNA because of its secondary market status.

TDBNA has a deposit market share of 7.3 percent, resulting in a market ranking of fourth out of 25 deposit-taking institutions. The bank's market ranking places it in the 16th percentile of depository institutions.

The bank has a share of 2.0 percent for mortgage lending market and is the tenth-ranked lender out of 440 lenders in the MSA. The market for loans is very competitive and the competition consists of national and local lenders of varying sizes, including megabanks. The five largest lenders have captured 29.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the second percentile of mortgage lenders in the MSA.

The bank has a market share of 2.5 percent for small business lending and is the ninth-ranked lender out of 94 lenders. The market consists of national, regional, and local lenders of different sizes, including large issuers of small business credit cards. Competition for loans is very strong in the MSA. The five largest lenders have captured 59.0 percent of the small business lending market. Comparing TDBNA's small business lending market ranking to the number of lenders in the market, the bank is in the ninth percentile for small business lenders.

TDBNA's mortgage and small business market shares and rankings are weaker than its deposit market share and ranking. Evaluating the bank's performance by comparing the bank's lending performance to its deposit base, as percentile rankings, incorporates the volume and nature of the bank's competition into the evaluation. The bank's lending performance, measured as a percentile ranking, is comparable to deposits. TDBNA's deposit base, as a percentile ranking, is in the 16th percentile while mortgage lending is in the second percentile and small business lending is in the ninth percentile. The bank's lending activity performance is adequate.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is adequate.

Atlantic City MSA AA

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in low- and moderate-income geographies is adequate. The proportion of loans was somewhat weaker than the proportion of owner-occupied housing units in both low- and moderate-

income geographies. The distribution of loans was stronger than the aggregate distribution of loans in low- and moderate-income geographies.

- Performance in the 2017 evaluation period is stronger than the bank's performance in the 2014-2016 period, and considered excellent. Performance is stronger because the proportion of loans in both low- and moderate-income geographies are stronger than the proportion of owner-occupied housing units in those geographies. The stronger performance in 2017 has minimal impact on the overall assessment of Lending Test performance because performance was evaluated over a significantly shorter period of time

Trenton MSA AA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending in low-income geographies is very poor, and distribution in moderate-income geographies is good. The proportion of loans was significantly weaker than the proportion of owner-occupied housing units in low-income geographies, and near to the proportion of housing units in moderate-income geographies. The distribution of loans in low-income geographies is near to the aggregate distribution of loans in those geographies, and distribution of loans in moderate-income geographies is stronger than the aggregate distribution of loans in those geographies.
- The bank's performance in the 2017 evaluation period is stronger than the performance in the 2014-2016 period, and is considered excellent. Performance is stronger because the proportion of home mortgage lending in low- and moderate-income geographies is stronger than the proportion of owner-occupied housing units in those geographies. The stronger performance has minimal impact on the overall Lending Test performance because performance was evaluated over a significantly shorter period of time.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is good.

Atlantic City MSA AA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low-income geographies is adequate and the distribution in moderate-income geographies is good. The proportion of loans was somewhat weaker than the proportion of businesses in low-income geographies, and near to the proportion in moderate-income geographies. The proportion of small loans to businesses in low-income geographies was somewhat weaker than the aggregate distribution of loans in those geographies, and distribution in moderate-income geographies was near to the aggregate distribution of loans in those geographies.
- Performance in the 2017 evaluation period is stronger than the bank's performance in the 2014-2016 period, and is considered excellent. Performance is stronger because the

proportion of loans exceeds the proportion of businesses in moderate-income geographies, and the proportion of loans are stronger than the aggregate distribution of loans in moderate-income geographies. The stronger performance has minimal impact on the overall Lending Test performance because performance was evaluated over a significantly shorter period of time.

Trenton MSA AA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low-income geographies is poor and the distribution in moderate-income geographies is excellent. The proportion of loans was weaker than the proportion of businesses in low-income geographies, and stronger than the proportion in moderate-income geographies. The proportion of small loans to businesses in low-income geographies is near to the aggregate distribution of loans in those geographies, and the distribution of loans in moderate-income geographies was stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall good performance.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank’s home mortgage loans to low- and moderate-income borrowers is good.

Atlantic City MSA AA

- During the 2014-2016 evaluation period, the distribution of the bank’s home mortgage lending to low-income borrowers is poor, and excellent to moderate-income borrowers. The proportion of loans was weaker than the proportion of low-income borrowers, and stronger than moderate-income borrowers. The proportion of mortgage loans was significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. Performance in the 2017 evaluation period is consistent with the overall good performance.

Trenton MSA AA

- During the 2014-2016 evaluation period, the distribution of the bank’s home mortgage lending to low-income borrowers is adequate, and excellent to moderate-income borrowers. The proportion of loans was somewhat weaker than the proportion of low-income borrowers, and significantly stronger than the proportion of moderate-income borrowers. The proportion of mortgage loans was significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. Performance in the 2017 evaluation period is consistent with the overall good performance.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

Atlantic City MSA AA

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was somewhat weaker than the proportion of small businesses, but is significantly stronger than the aggregate distribution of loans to those businesses. Additionally, the bank made a significant majority (97.2 percent) of its business loans in amounts of \$100 thousand or less, and addressed an identified need in the community for business loans in smaller amounts. Performance in the 2017 evaluation period is consistent with the overall good performance.

Trenton MSA AA

- The distribution of the bank's small loans to businesses during the 2014–2016 evaluation period is good. The proportion of loans was weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The significant majority (96.2 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts. Performance in 2017 is consistent with the bank's performance in the 2014-2016 evaluation period, and considered good.

Community Development Lending

Refer to Table 1 in the state of New Jersey section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

Atlantic City MSA AA

TDBNA's CD lending in the Atlantic City MSA AA is adequate, and has a neutral impact on overall lending performance in the AA. During the evaluation period, the bank originated seven CD loans totaling \$3.5 million. CD lending in the Atlantic City AA represents 3.2 percent of allocated tier one capital. The bank's CD lending in the AA provides limited help in meeting community credit needs. Three CD loans support the development and retention of affordable housing, three CD loans support organizations providing community services to LMI individuals and families, and one CD loan supports the revitalization and stabilization of LMI areas.

Trenton MSA AA

The bank's CD lending in the Trenton MSA AA is adequate, and has neutral impact on overall lending performance in the AA. During the evaluation period, TDBNA originated ten CD loans totaling \$2.9 million, representing 2.7 percent of allocated tier one capital. The CD loans originated by the bank provide limited help in meeting community credit needs. The largest

amount of the bank's CD lending supported economic development in LMI areas. Other loans supported the development and retention of affordable housing and organizations providing community services to LMI individuals and families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Ocean City and Vineland MSA AAs is stronger than the overall High Satisfactory performance.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of New Jersey section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Atlantic City MSA AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 36 qualified investments totaling \$34.7 million, representing 32.0 percent of tier one capital allocated to this AA. There were no prior period investments.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made four LIHTC investments totaling \$34.4 million. A substantial majority of the dollar volume of the bank's current investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, and asset building.

Examples of qualified investments in this AA include:

- TDBNA provided \$8.5 million in LIHTC equity to fund the construction of a 72-unit affordable housing development in Absecon, New Jersey. The project provides 32 units for tenants with income at or below 60 percent of the AMI, 31 units for tenants with income at or below 50 percent of the AMI, and nine units for tenants with income at or below 30 percent of the AMI. Tenants are provided healthcare, legal, and career services;
- TDBNA provided \$11.3 million in LIHTC equity to fund a 90-unit residential development in Atlantic City, New Jersey. All units are available to individuals and families with income at or below 60 percent of the AMI;
- Grants totaling \$11.3 thousand to an organization that provides free transportation to low-income seniors in need of medical or rehabilitation services who are temporarily or permanently disabled;

- Grants totaling \$21 thousand to an organization to support a program that provides services to individuals with disabilities, special needs, and Veterans residing in Atlantic, Cape May, and Cumberland counties who have been placed in employment through the organization and are in need of post placement retention services in order to maintain employment; and
- Grants totaling \$15 thousand to a nonprofit economic development organization dedicated to assisting emerging entrepreneurs and small business owners to start and grow their businesses. The funds support the organization's Entrepreneurial Development Training Quick Start Series South Jersey, which is an initiative to expand access to entrepreneurial training and technical assistance to minorities and LMI communities in southern New Jersey.

Trenton MSA AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 79 qualified investments totaling \$13.6 million. Additionally, three prior period investments totaling \$7 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represent 18.6 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made 36 mortgage-backed security pool investments totaling \$12.9 million. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, and asset building.

Examples of qualified investments in this AA include:

- TDBNA invested in 36 mortgage-backed security pools totaling \$12.9 million;
- Grants totaling \$400 thousand to a community development network organization. The organization has several programs that focus on the creation of housing and economic opportunities for LMI residents;
- Grants totaling \$15 thousand to a nonprofit organization that helps homeless and very low-income parents get ready for the world of work. The organization assesses their skills, provides remedial education leading to high school diplomas and vocational training support, provides supportive case management, and teaches critical life skills so parents can become more self-sufficient; and
- Grants totaling \$22.5 thousand to a nonprofit organization to support their homeownership counseling and foreclosure prevention program. The organization provides one-on-one and group counseling to prepare LMI individuals for homeownership and intensive one-on-one counseling to help families avoid foreclosure.

The organization is a HUD certified housing counseling agency and approved foreclosure counseling agency of the New Jersey Housing and Mortgage Finance Agency for the NJ HomeKeeper and National Foreclosure Mitigation Counseling programs.

Statewide

TDBNA has four prior period statewide investments totaling \$4.4 million that remain outstanding and provide continuing benefit to the AA and one current period statewide investment totaling \$6.4 million.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Ocean City and Vineland MSA AAs is not inconsistent with the bank's overall Outstanding performance under the Investment Test in the state of New Jersey. Refer to the Table 14 in the state of New Jersey section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the state of New Jersey section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Atlantic City MSA AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. During the evaluation period the bank had a limited presence in the AA with eight branches. The bank had a significant number of branches and ATMs, as reflected in Table 15, in LMI areas compared to the population distribution.
- Additionally, the bank operated one branch in an urban middle-income area that was in the same neighborhood as a moderate-income geography. This branch was directly adjacent to (across the street from) a moderate-income geography. This branch helped to expand access to bank products and services to the moderate-income geography.

- The bank did not have any branch openings or closings during the evaluation period.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Trenton MSA AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is good.

- Delivery systems are accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. During the evaluation period the bank had a limited presence in the AA with nine branches. While the bank did not have any branches or ATMs in low-income areas, there was a sufficient number of branches and ATMs, as reflected in Table 15, in moderate-income areas compared to the population distribution.
- Additionally, the bank operated one branch in an urban middle-income area that was in the same neighborhood as a moderate-income geography. This branch was along public transit lines or in a central business district that serves the entire community. This branch helped to expand access to bank products and services to the moderate-income geography.
- The 2015 US Census ACS update had an impact on the geographic distribution of branches within the AA due to the redesignation of the income level of the geographies, not due to a change in the branch physical location. Specifically, while the number of branches in moderate-income geographies changed from one to three, the number of branches in low-income geographies went from one to zero.
- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, one branch was opened in an upper-income area.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Atlantic City MSA AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is adequate.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD

services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 13 bank employees either provided financial literacy training to LMI individuals or small business owners or held board or committee positions with qualifying organizations.

- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 29 financial education events totaling 76 hours. Eleven of these events were homebuyer, two were financial literacy, and 16 were small business classes. A total of 628 participants attended these events, including 252 individuals and 376 small business owners.

Trenton MSA AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is adequate.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 18 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties. These employees account for just over one quarter of the bank's employees in the AA.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 17 financial education events totaling 48 hours. Eight of these events were homebuyer and nine were small business classes. A total of 145 participants attended these events, including 54 individuals and 91 small business owners.
- In addition to financial education classes, bank employees provided 249 hours in assistance to six qualifying organizations in the AA. This assistance was provided through board or committee membership, or volunteering technical expertise.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Vineland MSA AA is consistent with the bank's overall High Satisfactory performance under the Service Test in New Jersey. Performance in the Ocean City MSA AA is weaker than the bank's overall performance in the state. Weaker performance is due to the bank's limited

presence in the AA, and is considered adequate. The performance in the limited-scope AAs provided further support for the state rating. Refer to Table 15 in the state of New Jersey section of Appendix D for the facts and data that support these conclusions.

State of New York

CRA Rating for New York¹⁵: Outstanding

The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's level of lending activity is good.
- TDBNA's distribution of loans among geographies of different income levels is excellent, based upon excellent home mortgage and small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage and small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are readily accessible to geographies and individuals of different income levels. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the communities in which it operated.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in New York

TDBNA has delineated four AAs within the state of New York. Specifically, the AAs include the complete MSA of Glens Falls; the partial MSAs of Albany-Schenectady-Troy (includes the counties of Albany, Rensselaer (Town of East Greenbush only), Saratoga, and Schenectady (Town of Niskayuna only)), Kingston (includes Ulster County (City of Kingston, Towns of Saugerties, Ulster, and Woodstock only)); and the non-MSA area consisting of Clinton, Columbia, and Sullivan counties. TDBNA's other operations in the State of New York were evaluated under the New York MMSA. TDBNA reported \$1.7 billion in deposits or 1.1 percent

¹⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

of total adjusted deposits. As of June 30, 2017, TDBNA ranked tenth in the state with a deposit market share of 2.2 percent; however, this ranking is inclusive of deposits attributable to the New York MMSA. Major banking competitors include JPMorgan Chase Bank, N.A., Citibank, N.A., and The Bank of New York, with deposit market shares of 34.6 percent, 6.7 percent, and 6.4 percent, respectively. Banking competition is very strong with 212 FDIC-insured depository institutions in the State of New York. TDBNA has a modest presence in the state with 25 branches and 26 deposit-taking ATMs. During the evaluation period, TDBNA made 1.3 percent of their HMDA loans and 0.8 percent of their small business loans within the state.

Refer to the community profiles for the New York in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New York

The Albany-Schenectady-Troy MSA (Albany MSA AA) was selected for a full scope review. The Albany MSA AA accounts for 28.6 percent of deposits; 28.0 percent of the branches; 25.8 percent of HMDA lending; and 34.9 percent of small business lending in the state.

Two community contacts were performed in the state related to this evaluation; both within the full-scope area. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity in the Albany MSA AA is good. The bank originated a significant volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage lending and small business loans are weaker than its deposit market share and ranking. The Albany MSA AA is not a primary market for TDBNA, and its limited presence in the AA is consistent with that status. The bank's network of eight branches is the 12th-largest in the AA. The Albany MSA AA has a concentration of large institutions within the market. Of the 23 institutions in the market, 13 have total deposits exceeding \$1 billion. The market also has a significant share of the deposit market concentrated in five institutions. The five largest institutions have captured 79.0 percent of the deposit market. The largest of those institutions, KeyBank, N.A., has 45.0 percent of the deposit market share in the AA. These conditions within the AA, a concentration of large institutions and a large percentage of the deposit market concentrated among five

institutions, create a very competitive market for TDBNA and the other institutions to achieve deposit and loan growth.

TDBNA has a deposit market share of 2.2 percent and a market ranking of ninth out of 23 deposit-taking institutions. The bank's market ranking is in the 39th percentile of depository institutions.

The bank has a market share of 0.5 percent for the mortgage lending market and is the 41st-ranked lender out of 318 lenders in the MSA. The market for loans is very competitive and the competition consists of national and local lenders of varying sizes, including megabanks. The five largest lenders have captured 36.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the 12th percentile of mortgage lenders in the MSA.

The bank has a market share of 1.1 percent for small business lending and is the 19th-ranked lender out of 103 lenders. The market consists of national, regional, and local lenders of different sizes, including issuers of small business credit cards on a nationwide scale. Competition for loans is very strong in the MSA. The five largest lenders have captured 59.0 percent of the small business lending market. Comparing TDBNA's small business lending market ranking to the number of lenders in the market, the bank is in the 18th percentile for small business lenders.

TDBNA's mortgage and small business market shares and rankings are weaker than its deposit market share and ranking. Comparing the bank's lending performance to its deposit base, as percentile rankings, incorporates the volume and nature of the bank's competition into the evaluation of the bank's performance. The bank's lending performance exceeds its deposit base when both are measured as percentile rankings. TDBNA's deposit base, as a percentile ranking, is in the 39th percentile while mortgage lending is in the 12th percentile and small business lending is in the 18th percentile. The bank's lending activity performance is good.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in both low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in both geographies, and also stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is excellent.

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low-income geographies is excellent and the distribution in moderate-income geographies is good. The proportion of loans was stronger than the proportion of businesses in low-income geographies, and near to the proportion of businesses in moderate-income geographies. The proportion of small loans to businesses in both low- and moderate-income geographies was stronger than the aggregate distribution of loans in those geographies. Performance in 2017 is consistent with performance in the 2014-2016 evaluation period, and considered excellent.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good.

- The distribution of the bank's home mortgage lending during the 2014–2016 evaluation period is good. The proportion of loans was somewhat weaker than the proportion of low-income families, and significantly stronger than the portion of moderate-income families. The distribution of loans to low-income families was significantly stronger and to moderate-income families stronger than the aggregate distribution of loans to those borrowers. Performance in the 2017 evaluation period is consistent with the overall good performance.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was weaker than the proportion of small businesses, but was stronger than the aggregate distribution of loans to those businesses. The significant majority (94.2 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans exceeded the proportion of small businesses and exceeded the aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Community Development Lending

Refer to Table 1 in the state of New York section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

The bank's CD lending performance in the Albany MSA AA is excellent, and has a significantly positive impact on overall lending performance in the AA. During the evaluation period, the bank originated 14 CD loans totaling \$19.9 million, representing 42.2 percent of allocated tier one capital. The bank's CD lending effectively helped to meet community credit needs. The bank originated nine CD loans supporting organizations providing community services to LMI individuals and families. Three of the bank's CD loans support economic development in LMI areas. One additional loan supports the development and retention of affordable housing and another loan supports the revitalization and stabilization of LMI areas. Specific examples of the bank's CD loans include:

- A \$7.5 million participation in a \$10 million construction loan for the construction of 60 affordable housing units; and
- Renewal of a \$2.5 million working capital line of credit to a health care provider for short-term cash flow needs caused by timing differences with funding sources, 75.0 percent of the organization's patients are at or below 80 percent of the AMI.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Glens Falls and Kingston MSA AAs, and the New York non-MSA AA is consistent with the overall Outstanding performance under the Lending Test in the state of New York. The bank's mortgage lending was weaker in the Glen Falls and Kingston MSA AAs; however, both had excellent community development lending which had a significantly positive impact on our evaluation of the Lending Test performance in those AAs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of New York section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 64 qualified investments totaling \$36.1 million. Additionally, six prior period investments totaling \$16 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 110.7 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made three LIHTC investments totaling \$32.9 million and two SBIC investments totaling \$2.6 million. A substantial majority of the dollar volume of the bank's current and prior period investments focus on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, asset building, and food and shelter.

Examples of qualified investments in this AA include:

- TDBNA provided \$11.4 million in LIHTC equity to fund the construction of a three-story, 60-unit affordable housing project in Ballston Spa, New York. The project provides 28 units for residents with income at or below 50 percent of the AMI and 32 units for residents with income at or below 60 percent of the AMI. TDBNA also provided \$8.8 million in LIHTC equity to fund the development of 61 units of affordable housing in the first phase of this development;
- TDBNA provided \$12.7 million in LIHTC equity for the construction of 61 new affordable housing apartment units in 11 residential buildings located on two adjacent sites, which are owned by the Albany Housing Authority (AHA). AHA will provide public housing operating subsidies for 45 units and an additional 16 units will be supported through the project-based Section 8 program;
- Grants totaling \$25 thousand to a nonprofit organization to support their drop-in center programs that serve individuals and families who are homeless or at risk of becoming homeless. The center offers a variety of free services to assist in achieving long term housing stability, financial stability, and self-sufficiency;
- Grants totaling \$38 thousand to a nonprofit organization to support a program that educates LMI girls about financial matters and prepares them to be financially savvy consumers; and
- A \$10 thousand grant to a nonprofit organization whose mission is to end homelessness within Albany County and the Capital Region. The organization serves the immediate need for shelter, food, and clothing in addition to addressing the long-term need for affordable housing and sustainable employment.

Statewide

TDBNA has two prior period statewide investments totaling \$1.3 million that remain outstanding and provide continuing benefit to the AA and one current period statewide investment totaling \$2.3 million.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the non-MSA New York AA is not inconsistent with the bank's overall Outstanding performance in

the state of New York. The bank's performance in the Kingston MSA AA and the Glens Falls MSA AA is weaker than the bank's overall Outstanding performance and is considered good and adequate, respectively. The weaker performance is primarily due to a relatively lower amount of investments relative to the bank's operations in the AAs. Performance in the limited-scope AA did not significantly affect the Investment Test rating for the state of New York. Refer to the Table 14 in the state of New York section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the state of New York section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. During the evaluation period the bank had a limited presence in the AA with seven branches. The bank had a significant number of branches and ATMs, as reflected in Table 15, in LMI areas. When assessing this performance we also considered the relatively low level of population in low-income geographies.
- Additionally, the bank operated one branch in an urban middle-income area that was in the same neighborhood as a moderate-income geography. This branch was directly adjacent to (across the street from) a moderate-income geography and helped to expand access to bank products and services to this moderate-income geography.
- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, one branch was closed in a middle-income area and two in upper-income areas. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is adequate.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 20 bank employees either provided financial literacy training to LMI individuals or small business owners or held board or committee positions with qualifying organizations. These employees account for nearly one third of the bank's employees in the AA.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 40 financial education events totaling 82 hours. Sixteen of these events were homebuyer, five were financial literacy, and 19 were small business classes. A total of 373 participants attended these events, including 202 individuals and 171 small business owners. These events addressed an identified CD need in the area, namely financial literacy programs for individuals and small business owners.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Kingston MSA AA is consistent with the bank's overall Outstanding performance under the Service Test in New York. Performance in the Glen Falls MSA AA and non-MSA New York AA is weaker than the bank's overall performance in the state, and is considered good. Weaker performance is due to the bank's limited presence in these AAs, and did not impact conclusions about the bank's performance in the state. Refer to Table 15 in the state of New York section of Appendix D for the facts and data that support these conclusions.

State of North Carolina

CRA Rating for North Carolina¹⁶: Outstanding

The Lending Test is rated: Outstanding
The Investment Test is rated: Outstanding
The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's level of lending activity is good.
- TDBNA's distribution of loans among geographies of different income levels is excellent, based upon excellent home mortgage and small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage lending and small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are readily accessible to geographies and individuals of different income levels. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the communities in which it operated.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in North Carolina

TDBNA has delineated four AAs within the state of North Carolina. These include the complete MSA of Wilmington; the partial MSAs of Asheville (excludes Madison County) and Hickory-Lenoir-Morganton (excludes Alexander, Caldwell, and Catawba counties); and the non-MSA area consisting of Macon, McDowell, Mitchell, Polk, Rutherford, and Yancey counties. TDBNA reported \$852.9 million in deposits or 0.6 percent of total adjusted deposits. As of June 30, 2017, TDBNA ranked twenty-third in the state with a deposit market share of 0.2 percent. Major banking competitors include Bank of America, N.A., Wells Fargo Bank, N.A.,

¹⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

and Branch Banking and Trust Company, with deposit market shares of 47.3 percent, 15.3 percent, and 13.9 percent, respectively. Banking competition is strong with 92 FDIC-insured depository institutions in the State of North Carolina. TDBNA has a modest presence in the state with 14 branches and 14 deposit-taking ATMs. During the evaluation period, TDBNA made 1.5 percent of their HMDA loans and 0.7 percent of their small business loans within the state.

Refer to the community profiles for the North Carolina in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in North Carolina

The Asheville MSA AA was selected for a full scope review. The Asheville MSA AA accounts for 55.6 percent of deposits; 57.1 percent of branches; 62.8 percent of HMDA lending and 48.5 percent of small business lending in the state.

One community contact was performed in the state related to this evaluation; it was conducted within the full-scope area. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is good. The bank originated a significant volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage lending and small business loans are weaker than its deposit market share and ranking. The bank has a limited presence in the Asheville MSA AA. The AA is not a primary market for TDBNA, and its limited network of eight branches is consistent with that status. The bank's branch network is the sixth-largest in the AA. The Asheville MSA AA has a concentration of large institutions within the market. Of the 20 institutions in the market, 15 have total deposits exceeding \$1 billion. Additionally, the five largest institutions have captured a significant share of the deposit market with 65.0 percent. The concentration of large institutions and the large percentage of the deposit market concentrated in five institutions creates a very competitive market and makes it challenging for TDBNA and the other institutions to achieve deposit and loan growth.

TDBNA has a deposit market share of 5.7 percent and a market ranking of eighth out of 20 deposit-taking institutions. The bank's market ranking is in the 40th percentile of depository institutions.

The bank has a mortgage lending market share of 1.0 percent and a market ranking of 26th out of 472 lenders in the MSA. The market for loans is very competitive and the competition consists of national and local lenders of varying sizes, including megabanks. The five largest lenders have captured 28.0 percent of the mortgage market. TDBNA is in the fifth percentile when comparing its market ranking relative to the number of mortgage lenders in the AA.

The bank has a market share of 1.3 percent for small business lending and is the 15th-ranked lender out of 88 lenders. The Asheville MSA AA consists of a wide range of lenders, including lenders with a nationwide market and lenders serving the local market. The AA also includes issuers of small business credit cards operating on a nationwide scale. Competition for loans is very strong in the MSA. The five largest lenders have captured 53.0 percent of the small business lending market. Comparing TDBNA's small business lending market ranking to the number of lenders in the market, the bank is in the 17th percentile for small business lenders.

TDBNA's mortgage and small business market shares and rankings are weaker than its deposit market share and ranking. Comparing the bank's lending performance to its deposit base, as percentile rankings, incorporates the bank's competitive environment into the evaluation of the bank's performance. The bank's lending performance exceeds its deposit base when both are measured as percentile rankings. TDBNA's deposit base, as a percentile ranking, is in the 40th percentile while mortgage lending is in the fifth percentile and small business lending is in the 17th percentile. The bank's lending activity performance is good.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in low- and moderate-income geographies. The proportion of loans in low- and moderate-income geographies was also stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is excellent.

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of businesses in both low- and moderate-income geographies. The proportion of small loans to businesses in low- and moderate-income geographies was stronger than the aggregate distribution of loans in those geographies.
- Performance in the 2017 evaluation period is weaker than the bank’s performance in the 2014-2016 period and considered adequate. Performance is weaker because the proportion of small loans to businesses in low-income geographies was significantly weaker than the proportion of businesses in those geographies and the proportion of lending in low-income geographies was significantly weaker than the aggregate distribution of loans in those geographies. The bank’s adequate performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank’s home mortgage loans to low- and moderate-income borrowers is good.

- The distribution of the bank’s home mortgage lending during the 2014–2016 evaluation period is good. The proportion of loans was weaker than the proportion of low-income families, and near to the proportion of moderate-income families. The proportion of loans in low- and moderate-income geographies was significantly stronger than the aggregate distribution of loans to those borrowers. Performance in the 2017 evaluation period is consistent with the overall good performance.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank’s originations and purchases of small loans to businesses is good.

- During the 2014–2016 evaluation period, the distribution of the bank’s small loans to businesses by revenue is good. The proportion of loans was somewhat weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The majority (87.8 percent) of the bank’s business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans was stronger than the proportion of small businesses and significantly stronger than the aggregate distribution of loans to those businesses. The bank’s excellent performance had

minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Community Development Lending

Refer to Table 1 in the North Carolina section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

The bank's CD lending performance in the Asheville MSA AA is excellent, and has a significantly positive impact on overall lending performance in the AA. During the evaluation period, TDBNA originated nine CD loans totaling \$10.2 million, representing 21.7 percent of allocated tier one capital. The bank helped to meet community credit needs through its CD lending. The bank originated four CD loans supporting the development and retention of affordable housing and an additional four CD loans supporting organizations providing community services to LMI individuals and families. One additional loan supports the revitalization and stabilization of LMI areas. Specific examples of the bank's CD loans include:

- A \$6.8 million construction loan for the renovation and construction of a planned mixed-use affordable housing development. Thirty-eight of the 62 residential units will be for residents with income up to 60 percent of the adjusted AMI. The remaining 24 housing units will be workforce units. The development will also have eight commercial units;
- Renewal of a \$750 thousand working capital line of credit providing funding to an organization providing health care to LMI patients. Seventy-five percent of the organizations patients are at or below 80 percent of the adjusted AMI; and
- A \$500 thousand revolving line of credit providing funding to a CDFI for making small business loans. The CDFI focuses on small businesses owned by women, minorities, farmers, contractors, and veterans. The CDFI also looks to loan money to small businesses located in rural and/or distressed areas.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Hickory and Wilmington MSA AAs, and the North Carolina non-MSA AA is consistent with the overall Outstanding performance under the Lending Test in the state of North Carolina.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of North Carolina section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 120 qualified investments totaling \$7.9 million. Additionally, two prior period investments totaling \$6 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 29.5 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made one LIHTC investment totaling \$6.9 million and two mortgage-backed security pool investments totaling \$339.8 thousand. A substantial majority of the dollar volume of the bank's current and prior period investments focus on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, and asset building.

Examples of qualified investments in this AA include:

- TDBNA provided \$6.9 million in LIHTC equity to fund the construction of an 80-unit affordable housing project in Hendersonville, North Carolina. All 80 units are restricted to families with income at or below 60 percent of the AMI;
- Grants totaling \$10 thousand to a private, nonprofit community supported organization that provides financial education and counseling. The grants will be used to support the organization's comprehensive homebuyer program that assists LMI consumers and first-time homebuyers build financial knowledge and tools for budgeting, saving, improving credit, and buying a home;
- Grants totaling \$44.5 thousand to support Pardee Memorial Hospital Foundation's Women Helping Women Program. The program is dedicated to improving the health of uninsured and under-insured women in Henderson County. The funds are utilized for screenings, treatments, services, improved facilities, and new equipment purchases to meet the critical needs, including breast and other women's cancers, heart disease, osteoporosis, and other health needs for LMI women in Henderson County; and
- Grants totaling \$14.3 thousand to support a nonprofit organization's adult education program that matches trained volunteer tutors to work one-on-one with adults who seek to improve their reading, writing, spelling, and math skills. Participants earn a High School Equivalency diploma.

Statewide

TDBNA has one current period statewide investment totaling \$52.6 thousand.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Hickory and Wilmington MSA AAs, and non-MSA North Carolina AA is not inconsistent with

the bank's overall Outstanding performance under the Investment Test in the state of North Carolina. Performance in the limited-scope AAs did not significantly affect the Investment Test rating for the state of North Carolina. Refer to the Table 14 in the state of North Carolina section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the state of North Carolina section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. During the evaluation period the bank had a limited presence in the AA with eight branches. While the bank did not have any branches or ATMs in low-income areas, there was an adequate number of branches and ATMs, as reflected in Table 15, in moderate-income areas. When assessing performance we also considered the relatively low level of population in low-income geographies.
- Additionally, the bank operated one branch in an urban middle-income area and one branch in an upper-income area that were in the same neighborhood as moderate-income geographies. One of these branches was directly adjacent to a moderate-income geography. The other branch was along public transit lines or in a central business district that serves the entire community. These branches helped to expand access to bank products and services to these moderate-income geographies.
- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, one branch was closed in a middle-income area. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is excellent.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 29 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties. These employees account for nearly one third of the bank's employees in the AA.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 67 financial education events totaling 129 hours. Eighteen of these events were homebuyer, 33 were financial literacy, and 16 were small business classes. A total of 2,346 participants attended these events, including 2,250 individuals and 96 small business owners. These events addressed an identified CD need in the area, namely financial literacy programs.
- In addition to financial education classes, bank employees provided 374 hours in assistance to 16 qualifying organizations in the AA. This assistance was provided through board or committee membership, or volunteering technical expertise.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Wilmington MSA AA is consistent with the bank's overall Outstanding performance under the Service Test in North Carolina. Performance in the Hickory MSA AA and non-MSA North Carolina AA is weaker than the bank's overall performance in the state, and is considered adequate. Weaker performance is due to the bank's very limited presence in these AAs, and did not impact conclusions about the bank's performance in the state. Refer to Table 15 in the state of North Carolina section of Appendix D for the facts and data that support these conclusions.

State of South Carolina

CRA Rating for South Carolina¹⁷: Outstanding

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is excellent, based upon good home mortgage and excellent small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage lending and small business lending.
- The bank's good level of CD lending had a slightly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are readily accessible to geographies and individuals of different income levels. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the communities in which it operated.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in South Carolina

TDBNA has delineated twelve AAs within the state. Nine are located in MSAs and three are located in non-MSA portions of the state. They include: the complete Greenville-Anderson-Mauldin, Charleston-North Charleston, Hilton Head-Bluffton, and Myrtle Beach-Conway-North Myrtle Beach MSAs; the partial MSAs of Augusta (excluding Edgefield County), Charlotte-Concord-Gastonia (excludes Chester and Lancaster counties), Columbia (excludes the counties of Calhoun, Fairfield, and Saluda), Florence (excludes Darlington County), and Spartanburg (excludes Union County). The non-MSA AAs were combined for analysis purposes and consist of the counties of Georgetown, Greenwood, Marion, Newberry, and Oconee. TDBNA reported \$3.9 billion in deposits or 2.6 percent of total adjusted deposits. As

¹⁷ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

of June 30, 2017, TDBNA ranked sixth in the state with a deposit market share of 4.9 percent. Major banking competitors include Wells Fargo Bank, N.A., Bank of America, N.A., and Branch Banking and Trust Company, with deposit market shares of 20.2 percent, 15.1 percent, and 9.6 percent, respectively. Banking competition is strong with 84 FDIC-insured depository institutions in the State of South Carolina. TDBNA has an established presence in the state with 62 branches and 63 deposit-taking ATMs. During the evaluation period, TDBNA made 9.0 percent of their HMDA loans and 2.3 percent of their small business loans within the state.

Refer to the community profiles for South Carolina in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in South Carolina

The Greenville-Anderson-Mauldin MSA (Greenville MSA AA) was selected for a full scope review. The Greenville MSA AA accounts for 39.0 percent of deposits; 30.6 percent of the branches; 16.7 percent of HMDA lending; and 30.0 percent of small business lending in the state.

Two community contacts were performed in the state related to this evaluation; both in the full-scope area. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Lending Activity

Based on the Data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage lending and small business loans are weaker than its deposit market share and ranking. The bank has a large presence in the Greenville MSA AA and considers it to be a primary market. Consistent with that designation, TDBNA has the fourth-largest deposit market share and the third-largest branch network with 19 branches. The Greenville MSA AA has a significant concentration of large institutions within the market. Of the 35 institutions in the market, 20 are large institutions with total deposits exceeding \$1 billion. The market also has a significant share of the deposit market (59.0 percent) concentrated in five institutions, including TDBNA. The Greenville market, with a concentration of large institutions and a large percentage of the deposit market concentrated among five institutions, creates a very competitive market for TDBNA and the other institutions.

TDBNA has a deposit market share of 10.1 percent and a market ranking of fourth out of 35 deposit-taking institutions. The bank's market ranking is in the 11th percentile of depository institutions.

The bank has a share of 1.2 percent of the mortgage lending market and is the 24th-ranked lender out of 502 lenders in the MSA. The market for loans is very competitive and the competition consists of national and local lenders of varying sizes, including megabanks. The five largest lenders have captured 21.0 percent of the mortgage market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the fourth percentile of mortgage lenders in the MSA.

The bank has a market share of 1.3 percent for small business lending and is the 15th-ranked lender out of 110 lenders. The market consists of national, regional, and local lenders of different sizes, including national issuers of small business credit cards. Competition for loans is very strong in the MSA. The five largest lenders have captured 58.0 percent of the small business lending market. Comparing TDBNA's small business lending market ranking to the number of lenders in the market, the bank is in the 13th percentile for small business lenders.

TDBNA's mortgage and small business market shares and rankings are weaker than its deposit market share and ranking. Comparing the bank's lending performance to its deposit base, as percentile rankings, incorporates the volume and nature of the bank's competition into the evaluation of the bank's performance. The bank's lending performance, measured as a percentile ranking, is comparable to deposits. TDBNA's deposit base, as a percentile ranking, is in the 11th percentile while mortgage lending is in the fourth percentile and small business lending is in the 13th percentile. The bank's lending activity performance is adequate.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is good.

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in low-income geographies is adequate, and excellent in moderate-income geographies; however, low-income geographies account for only 2.7 percent of geographies within the AA. The proportion of loans was somewhat weaker than the proportion of owner-occupied housing units in low-income geographies, and stronger in moderate-income geographies. The distribution of loans in both low- and moderate-income geographies is significantly stronger than the aggregate distribution of loans in those geographies. Performance in the 2017 evaluation period is consistent with performance in the prior period and good.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is excellent.

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of businesses in both low- and moderate-income geographies. The proportion of small loans to businesses in low- and moderate-income geographies was stronger than the aggregate distribution of loans in those geographies.
- Performance in the 2017 evaluation period is weaker than the bank's performance in the prior period and considered good. Performance is weaker because the proportion of small loans to businesses in low-income geographies was weaker than the proportion of businesses in those geographies. The bank's good performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good.

- The distribution of the bank's home mortgage lending during the 2014–2016 evaluation period is good. The proportion of loans was somewhat weaker than the proportion of low-income families and stronger than the proportion of moderate-income families. The distribution of loans in both low- and moderate-income geographies was stronger than the aggregate distribution of loans to those borrowers. Performance in the 2017 evaluation period is consistent with the overall good performance.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans was weaker than the proportion of small businesses, but was stronger than the aggregate distribution of loans to those businesses. The majority (84.3 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts.
- Performance in the 2017 evaluation period is stronger than performance in the 2014-2016 period and considered excellent. Performance is stronger because the proportion of loans was stronger than the proportion of small businesses and significantly stronger than the

aggregate distribution of loans to those businesses. The bank's excellent performance had minimal impact on our evaluation of overall lending performance because performance was evaluated over a significantly shorter period of time.

Community Development Lending

Refer to Table 1 in the South Carolina section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

TDBNA's CD lending performance in the Greenville MSA AA is good, and has a positive impact on overall lending performance in the AA. During the evaluation period, the bank originated 18 CD loans totaling \$7.6 million, representing 5.1 percent of allocated tier one capital. The bank's CD lending helps to meet the credit needs of its community. The bank originated 15 CD loans supporting the development and retention of affordable housing. Another two loans support the revitalization and stabilization of LMI areas and an additional loan supports an organization providing community services to LMI individuals and families. Examples of the bank's CD loans include:

- A \$4.5 million term loan to refinance debt on an office building operating as a small business incubator. It provides flexible lease options and a collaborative work environment for entrepreneurs, startups, and small technology businesses; and
- A \$1.6 million loan to refinance a Section 8 housing complex. Sixty of the 80 housing units are Section 8-qualified housing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Augusta, Charleston, Charlotte, Columbia, Florence, Hilton Head, Myrtle Beach, and Spartanburg MSA AAs, and the South Carolina non-MSA is consistent with the overall High Satisfactory performance under the Lending Test in the state of South Carolina.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of South Carolina section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 112 qualified investments totaling \$21.5 million. Additionally, five prior period investments totaling \$19.1 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represents 27.1 percent of tier one capital allocated to the AA.

The bank's responsiveness to the CD needs of the AA is excellent. During the current evaluation period, TDBNA made four LIHTC investments totaling \$19.1 million and one mortgage-backed security pool investment totaling \$526.3 thousand. A substantial majority of the dollar volume of the bank's current and prior period investments focus on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, and asset building.

Examples of qualified investments in this AA include:

- TDBNA provided \$8.1 million in LIHTC equity to fund the construction of a 60-unit affordable housing project for seniors aged 62 and above in Greenville, South Carolina. The project consists of one main three-story central corridor elevator building containing 48 units and six single-story duplex style buildings containing 12 units on a 6.5-acre tract of land. All units are restricted to residents with income at or below 60 percent of the AMI, and all of the units are subsidized by a project-based Section 8 HAP contract;
- Grants totaling \$35 thousand to a nonprofit organization in support of both flood disaster relief and the Backpack Child Weekend Feeding Program, which serves elementary and middle school students in need of healthy food and provides weekend meals for children who might not eat again until Monday at school;
- Grants totaling \$32.5 thousand to a nonprofit organization that provides financing and training to startups and existing small businesses in the area. The funds support the organization's microloan program for underserved entrepreneurs; and
- Grants totaling \$39.3 thousand to a nonprofit organization that supports preschool and after school programs for LMI children. The organization's goal is to keep students safe, active, and engaged in productive learning.

Statewide

TDBNA has one prior period statewide investment totaling \$200 thousand that remains outstanding and provides continuing benefit to the AA and one current period statewide investment totaling \$538.4 thousand.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Augusta, Charleston, Charlotte, Columbia, Florence, Hilton Head, Myrtle Beach, and Spartanburg MSA AAs, and the non-MSA South Carolina AA is not inconsistent with the bank's overall Outstanding performance under the Investment Test in the state of South Carolina. Performance in the limited-scope AAs did not significantly affect the Investment Test rating for the state of South Carolina. Refer to the Table 14 in the state of South Carolina section of Appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the state of South Carolina section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had a significant number of branches and ATMs, as reflected in Table 15, in LMI areas compared to the population distribution.
- Additionally, the bank operated one branch in an urban middle-income area and one branch in an upper-income area that were in the same neighborhood as moderate-income geographies. One of these branches was directly adjacent to a moderate-income geography. The other branch was along public transit lines or in a central business district that serves the entire community. These branches helped to expand access to bank products and services to these moderate-income geographies.
- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, two branches were closed, one in a moderate-income area and one in a middle-income area. The moderate-income branch was closed due to low sales activity and transaction volume. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is excellent.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 70 bank employees either provided financial literacy training to LMI

individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.

- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 179 financial education events totaling 394 hours. Twenty-six of these events were homebuyer, 128 were financial literacy, and 25 were small business classes. A total of 4,626 participants attended these events, including 4,476 individuals and 150 small business owners. These events address an identified CD need in the area, namely financial literacy programs for LMI individuals and small business owners.
- In addition to financial education classes, bank employees provided 921 hours in assistance to 22 qualifying organizations in the AA. This assistance was provided through board or committee membership, or volunteering technical expertise.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Columbia and Florence MSA AAs is consistent with the bank's overall Outstanding performance under the Service Test in South Carolina. Performance in the Charleston, Charlotte, Hilton Head, and Myrtle Beach MSA AAs is weaker than the bank's overall performance in the state, and is considered good. Performance in the Augusta and Spartanburg MSA AAs, and non-MSA South Carolina AA is also weaker than the bank's overall performance in the state, and is considered adequate. Weaker performance is due to the bank's limited presence in these AAs, and did not impact conclusions about the bank's performance in the state. Refer to Table 15 in the state of South Carolina section of Appendix D for the facts and data that support these conclusions.

State of Vermont

CRA Rating for Vermont¹⁸: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank's level of lending activity is adequate.
- TDBNA's distribution of loans among geographies of different income levels is good, based upon excellent home mortgage lending and good small business lending.
- TDBNA's distribution of loans to individuals and businesses of different income levels is good, based upon good home mortgage and small business lending.
- The bank's excellent level of CD lending had a significantly positive impact on the bank's overall Lending Test performance.
- An excellent level of qualified investments.
- Delivery systems are readily accessible to geographies and individuals of different income levels. The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the communities in which it operated.
- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities.

Description of Institution's Operations in Vermont

TDBNA has delineated three AAs within the state of Vermont. These include one in an MSA and two in non-MSA areas, which for analysis purposes, we combined into one area. Specifically, the AAs include the complete MSAs of Burlington-South Burlington and the non-MSA Vermont area consisting of Bennington, Caledonia, Lamoille, Orleans, Rutland, Windham, Windsor, and Washington counties. TDBNA reported \$2.5 billion in deposits or 1.7 percent of adjusted deposits. As of June 30, 2017, TDBNA ranked second in the state with a deposit market share of 20.4 percent. Major banking competitors include Peoples United Bank, N.A., Community Bank, N.A., and Citizens Bank, N.A., with deposit market shares of 23.1 percent, 10.0 percent, and 6.5 percent, respectively. Banking competition is modest with 23 FDIC-

¹⁸ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

insured depository institutions in the State of Vermont. TDBNA has an established presence in the state with 30 branches and 42 deposit-taking ATMs. During the evaluation period, TDBNA made 1.3 percent of HMDA loans and 1.0 percent of small business loans within the state.

Refer to the community profiles for the Vermont in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Vermont

The Burlington MSA AA and the non-MSA Vermont AA were both selected for full scope reviews. The Burlington MSA AA accounts for 46.8 percent of deposits; 43.3 percent of branches; 39.2 percent of HMDA lending and 44.0 percent of small business lending in the state. The non-MSA Vermont AA accounts for 53.2 percent of deposits; 56.7 percent of branches; 50.8 percent of HMDA lending; and 56.0 percent of small business lending in the state.

Three community contacts were performed in the state related to this evaluation; one in the Burlington MSA AA and two in the non-MSA Vermont AA. The bank's performance in meeting the primary financial needs identified were considered in TDBNA's evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VERMONT

LENDING TEST

Lending Activity

Burlington MSA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

TDBNA's market shares and rankings for mortgage lending and small business loans are weaker than its deposit market share and ranking. The bank has a large presence within this small market consisting of only 12 deposit-taking institutions. The bank's share of the deposit market is second-largest and its network of 13 branches is the largest in the MSA. Although there is a small number of deposit-taking institutions in the MSA, competition for deposits and loans is strong. The markets for deposits and loans are concentrated among a few of the larger institutions. Although TDBNA is one of the larger institutions in the MSA, these market conditions represent challenges for the bank as it seeks deposit and loan growth.

TDBNA has a deposit market share of 25.6 percent, resulting in a market ranking of second out of 12 deposit-taking institutions. The bank's market ranking places it within the 16th percentile of depository institutions. The five largest institutions, including TDBNA, hold 89.0 percent of the deposit market.

The bank has a market share of 1.1 percent for mortgage lending and is the 22nd-ranked lender out of 188 lenders in the MSA. The loan market is competitive and is made up of national and local lenders of varying sizes, including megabanks. The five largest mortgage lenders hold 44.0 percent of the market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the 11th percentile of all mortgage lenders in the MSA.

The bank has a market share of 3.8 percent for small business lending and is the sixth-ranked lender out of 70 lenders. Although the market consists of a relatively small number of lenders, it has local and national lenders of very different sizes, including megabanks. It also includes national issuers of small business credit cards. Competition for loans is strong in the MSA. The five largest lenders have captured 67.0 percent of the market for small business loans. Comparing TDBNA's market ranking for small business lending to the number of lenders in the market, the bank is in the eighth percentile for lenders.

Mortgage and small business market shares and rankings are weaker than the bank's deposit market share and ranking. Comparing the bank's percentile rankings within its respective markets is a more accurate assessment of the bank's performance relative to the volume and nature of its competition. The bank's lending performance, measured in this manner, is more comparable to its deposit base and the level and nature of competition in the MSA with the bank in the 16th percentile for deposits compared to its position in the 11th percentile for mortgage lending and eighth percentile for small business lending.

Vermont Non-MSA

Based on the data in Table 1 and the following performance context considerations, we concluded TDBNA's lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, and market presence.

The market shares and rankings for TDBNA's mortgage lending and small business loans are weaker than its deposit market share and ranking. The bank has a large presence in a small market, consisting of only 19 deposit-taking institutions. The bank has the second-largest share of the deposit market and the second-largest branch network. Although TDBNA is a large institution within this small market, there is still strong competition in the market for deposits and loans. Large shares of the deposit and loan markets are concentrated in a few institutions. Achieving deposit and loan growth remain challenging because of the competition within this market.

TDBNA has a deposit market share of 19.4 percent, resulting in a market ranking of second out of 19 deposit-taking institutions. The five largest institutions, including TDBNA, hold 60.0 percent of the deposit market.

The bank has a market share of 2.2 percent for mortgage lending and is the 13th-ranked lender out of 265 lenders in the market. The market for loans is competitive with national and local lenders of varying sizes, including megabanks. The five largest mortgage lenders have captured 30.0 percent of the market. Comparing the bank's market ranking to the number of mortgage lenders, TDBNA is in the fourth percentile of all mortgage lenders in the market.

The bank has a market share of 4.2 percent for small business lending and is the fifth-ranked lender out of 77 lenders. Although the market consists of a relatively-small number of lenders, it includes national and local lenders of different sizes. It also includes national issuers of small business credit cards. Competition for loans is very strong in the market. The five largest lenders have captured 60.0 percent of the market for small business loans. Comparing TDBNA's market ranking for small business lending to the number of lenders in the market, the bank is in the sixth percentile for small business lenders.

Mortgage and small business market shares and rankings are weaker than the bank's deposit market share and ranking. Comparing the bank's percentile rankings within its respective markets is a more accurate assessment of the bank's performance relative to the volume and nature of its competition. The bank's lending performance, measured in this manner, is more comparable to its deposit base and the level and nature of competition in the AA with the bank in the 10th percentile for deposits compared to its position in the fourth percentile for mortgage lending and sixth percentile for small business lending.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, we concluded the geographic distribution of the bank's home mortgage loan originations and purchases is excellent.

Burlington MSA AA

- During the 2014-2016 evaluation period, the distribution of home mortgage lending in low- and moderate-income geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in low- and moderate-income geographies, and stronger than the aggregate distribution of loans in low- and moderate-income geographies. Performance in the 2017 evaluation period is consistent with the overall excellent performance.

Vermont Non-MSA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending in moderate-income geographies is good. The proportion of loans was near to the proportion of housing units in moderate-income geographies. The distribution of loans in moderate-income geographies was near to the aggregate distribution of loans in those geographies. While performance in the low-income geographies is excellent, there are only 0.10 percent owner-occupied housing unit in low-income geographies in the assessment area.
- The bank's performance in the 2017 evaluation period is weaker than the performance in the 2014-2016 period, and is considered adequate. Performance is weaker because the proportion of home mortgage lending in moderate-income geographies was weaker than the proportion of owner-occupied housing units in those geographies, and the distribution of loans in moderate-income geographies was significantly weaker than the aggregate

distribution of loans in those geographies. The weaker performance has minimal impact on the overall Lending Test evaluation because the 2017 evaluation period is significantly shorter than the 2014-2016 evaluation period.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, we concluded the geographic distribution of the bank's originations and purchases of small loans to businesses is good.

Burlington MSA AA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in low- and moderate-income geographies is excellent. The proportion of loans was equal to the proportion of businesses in low-income geographies, and substantially meets the proportion in moderate-income geographies. The proportion of small loans to businesses in low- and moderate-income geographies was stronger than the aggregate distribution of loans in those geographies.
- Performance in 2017 is consistent with the bank's performance in the prior period, and is considered excellent. The evaluation of the bank's performance is based upon a small volume of loans within the very small number of tracts and is given minimal weight in concluding on the bank's performance.

Vermont Non-MSA

- During the 2014–2016 evaluation period, the distribution of small loans to businesses in moderate-income geographies is adequate. The proportion of loans was weaker than the proportion of businesses in moderate-income geographies. The proportion of small loans to businesses in moderate-income geographies was somewhat weaker than the aggregate distribution of loans in those geographies. There are only 0.20 percent of businesses in low-income geographies in the assessment area. Performance in the 2017 evaluation period is consistent with the bank's performance in the prior period, and considered adequate.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, we concluded the distribution of the bank's home mortgage loans to low- and moderate-income borrowers is good.

Burlington MSA AA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending to low-income borrowers is good, and excellent to moderate-income borrowers. The proportion of loans was near to the proportion of low-income borrowers, and

significantly stronger than moderate-income borrowers. The proportion of mortgage loans was significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. Performance in the 2017 evaluation period is consistent with performance in the 2014-2016 evaluation period.

Vermont Non-MSA

- During the 2014-2016 evaluation period, the distribution of the bank's home mortgage lending to low-income borrowers is adequate, and excellent to moderate-income borrowers. The proportion of loans was somewhat weaker than the proportion of low-income borrowers, and stronger than the proportion of moderate-income borrowers. The proportion of mortgage loans was significantly stronger than the aggregate distribution of loans to low- and moderate-income borrowers. Performance in 2017 is consistent with performance in the 2014-2016 evaluation period.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, we concluded the borrower distribution of the bank's originations and purchases of small loans to businesses is good.

Burlington MSA AA

- During the 2014–2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is good. The proportion of loans is weaker than the proportion of small businesses, but is significantly stronger than the aggregate distribution of loans to those businesses. Additionally, the bank made a significant majority (94.7 percent) of its business loans in amounts of \$100 thousand or less, and addressed an identified need in the community for business loans in smaller amounts. Performance in the 2017 evaluation period is consistent with the performance in the 2014-2016 period, and considered good.

Vermont Non-MSA

- The distribution of the bank's small loans to businesses during the 2014–2016 evaluation period is good. The proportion of loans is weaker than the proportion of small businesses, but is stronger than the aggregate distribution of loans to those businesses. The significant majority (93.3 percent) of the bank's business loans are for \$100 thousand or less and address an identified need in the community for business loans in smaller amounts. Performance in 2017 is consistent with the bank's performance in the 2014-2016 evaluation period, and considered good.

Community Development Lending

Refer to Table 1 in the state of Vermont section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans.

Burlington MSA AA

The bank's CD lending in the Burlington MSA AA is excellent, and has a significantly positive impact on overall lending performance in the AA. During the evaluation period, TDBNA originated 19 CD loans totaling \$92.3 million. CD lending in the Burlington AA represents 78.7 percent of allocated tier one capital. The CD lending originated by the bank effectively helps meet the community credit need for affordable housing. All 19 of the bank's CD loans support the development and retention of affordable housing in the area. Some examples of the bank's affordable housing loans include:

- The bank originated two working capital lines of credit for bonds issued by an affordable housing agency. The lines of credit were for \$16.5 million and \$12.8 million, respectively. The agency uses the bonds to provide financing for single-family and multi-family affordable housing;
- Renewal of a \$10 million working capital line of credit to an agency that promotes and finances affordable housing for LMI individuals and families; and
- A \$6.5 million loan for the redevelopment of 64 units of affordable housing. All 64 units are income qualified and affordable for LMI residents. The units are part of an existing 148 rental unit housing development.

Vermont Non-MSA AA

TDBNA's CD lending in the Vermont non-MSA AA is excellent, and has a significantly positive impact on its overall lending performance in the AA. The bank originated 12 CD loans totaling \$21.6 million during the evaluation period. The bank's CD lending represents 16.2 percent of allocated tier one capital. The CD loans originated by the bank effectively help meet community credit needs within the Vermont non-MSA AA. TDBNA originated eight loans supporting the development and retention of affordable housing. Three loans support organizations providing community services and one additional loan supports the revitalization and stabilization of LMI areas. Some of the bank's CD loans include:

- A \$5.5 million construction loan to rehabilitate 104 units of rental property. Eighty-nine of the units are income qualified and affordable for LMI residents (LIHTC project);
- A \$2.8 million loan for the rehabilitation of three buildings consisting of 15 rental units. Eleven of the 15 units are income qualified and affordable for LMI residents (LIHTC project); and
- A \$1.5 million line of credit to a CDFI to support a simultaneous second mortgage program for first-time home buyers.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the state of Vermont section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Burlington MSA AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 86 qualified investments totaling \$22.3 million. Additionally, seven prior period investments totaling \$16.1 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represent 32.7 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. During the current evaluation period, TDBNA made two LIHTC investments totaling \$11.5 million and 17 mortgage-backed security pool investments totaling \$10 million. A substantial majority of the dollar volume of the bank's current and prior period investments focus on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, asset building, food, and shelter.

Examples of qualified investments in this AA include:

- TDBNA provided \$8 million in LIHTC equity to fund the construction of a new 40-unit mixed-income cooperative housing development for LMI families in Burlington, Vermont. The project provides 34 units for residents with income at or below 60 percent of the AMI and six units for residents at market rate. The property is within walking distance to the central business district, which includes shopping, schools, restaurants, churches, and theaters. Each household is a member of the cooperative, and the cooperative will be actively engaged in the management of the property;
- TDBNA provided \$3.5 million in LIHTC equity to preserve 64 units of affordable housing for LMI families in the area;
- Grants totaling \$160 thousand to a community land trust for the purpose of providing funding for repairs to affordable rental housing and for financial and credit counseling programs;
- Grants totaling \$60 thousand to a local food bank to support LMI families in need of emergency food assistance; and
- Grants totaling \$26 thousand to an organization to support their women's small business programs and financial coaching programs for LMI individuals in the area.

Non-MSA Vermont AA

TDBNA has an excellent level of qualified investments. During the evaluation period, TDBNA originated 88 qualified investments totaling \$19.7 million. Additionally, 12 prior period

investments totaling \$20.1 million remain outstanding and provide continuing benefit to the AA. The combined current and prior period dollar volume of investments represent 29.9 percent of tier one capital allocated to this AA.

The bank's responsiveness to the CD needs in the AA is excellent. A substantial majority of the dollar volume of the bank's current and prior period investments focus on affordable housing, a primary credit need in the AA. A majority of the dollar volume of grants were to organizations that support affordable housing, for or provide community services to, LMI individuals and families such as financial literacy and education, homeownership classes, and asset building.

Examples of qualified investments in this AA include:

- TDBNA provided \$2.5 million in LIHTC equity for an affordable housing development in Morrisville, Vermont. The property is formerly known as Arthur's Department Store. The project provides 18 units of mixed-income housing and approximately 3,300 square feet of ground floor commercial rental space. Eight units are restricted to families with income at or below 60 percent of the AMI, five units are restricted to families with income at or below 50 percent of the AMI, and five units are at market rate;
- TDBNA provided \$3.5 million in LIHTC equity to fund the development of 27 units of affordable rental housing for families in Barre, Vermont. All of the units are restricted to residents with income at or below 60 percent of the AMI, and 12 of the units are subsidized by project-based Section 8 HAP contract. The project also provides 6,700 square feet of commercial space containing the offices of Downstreet Housing and Community Development. This project is part of a master plan for the City of Barre, which involves significant investment in the downtown area;
- TDBNA invested \$5.9 million in a NMTC transaction that included the acquisition of two Brattleboro manufacturing plants, the purchase of an abutting vacant lot, the construction of an addition to both buildings, the purchase and installation of new equipment, and a lease of the property and equipment back to the company at a below market rate. This prevented the relocation of the corporate headquarters and manufacturing plants from Brattleboro, Vermont. The manufacturing jobs represent approximately 15.0 percent of the manufacturing jobs in that area;
- Grants totaling \$16 thousand to an organization to support their financial literacy program, which provides free literacy instruction to over 200 low-income adults in their service area;
- Grants totaling \$15 thousand to a nonprofit organization to support their housing counseling program. The program provides financial literacy coaching, pre-purchase education and counseling, and post purchase counseling to renters and homeowners in Windham and Windsor Counties. The program targets LMI households and aims to help them acquire the knowledge and skills needed to make smart financial and housing decisions that will result in housing stability, financial well being, and successful homeownership.

Statewide

TDBNA has one prior period statewide investment totaling \$115.0 thousand that remains outstanding and provides continuing benefit to the AA and two current period statewide investments totaling \$435.2 thousand.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Retail Banking Services

Refer to Table 15 in the state of Vermont section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Burlington MSA AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.
- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. While the bank did not have any branches or ATMs in low-income areas, there was a significant number of branches and ATMs, as reflected in Table 15, in moderate-income areas. When assessing this performance we also considered the low level of population in low-income geographies.
- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, one branch was closed in a middle-income area. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Non-MSA Vermont AA

Based on the data in Table 15 and the following performance context considerations, we concluded the bank's retail service performance is excellent.

- Delivery systems are readily accessible to geographies and individuals of different income levels in the AA.

- The bank's branches and alternative delivery systems were effective and responsive in helping the bank provide services across the community. The bank had a significant number of branches and ATMs, as reflected in Table 15, in moderate-income areas compared to the population distribution. The AA does not have any low-income CTs.
- The 2015 US Census ACS update had an impact on the geographic distribution of branches within the AA due to the redesignation of the income level of the geographies, not due to a change in the branch physical location. Specifically, the number of branches in moderate-income geographies changed from four to three.
- The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of service across the community. As evidenced by the table, one branch was closed in an upper-income area. For branch closures, the bank demonstrated that standard procedures are followed in determining closures, and that procedures consider branch traffic and profitability, as well as proximity and accessibility of other branches.
- Neither branch hours of service or products and services offered at branches varied significantly between geographies of different income levels.

Community Development Services

Burlington MSA AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is adequate.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 20 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 35 financial education events totaling 78 hours. Seventeen of these events were homebuyer, one was financial literacy, and 17 were small business classes. A total of 206 participants attended these events, including 92 individuals and 114 small business owners. These events addressed an identified CD need in the area, namely financial literacy programs for individuals and small business training.
- In addition to financial education classes, bank employees provided 712 hours in assistance to seven qualifying organizations in the AA. This assistance was provided

mainly through board or committee membership, and also through volunteering technical expertise.

Non-MSA Vermont AA

Based on the level of community development services and the following performance context considerations, we concluded the provision of community development service is good.

- Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a sufficient number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 29 bank employees either provided financial literacy training to LMI individuals or small business owners or held board or committee positions with qualifying organizations. These employees account for nearly one quarter of the bank's employees in the AA.
- The bank specializes, and has developed significant expertise, in providing financial education training (including financial literacy and homeownership) to both LMI individuals (including youth and adults) and small business owners, along with supporting organizations with their financial literacy programs. Please refer to the CD Service – Financial Literacy and Education section earlier in this document for details on the types of training provided. During the evaluation period bank employees participated in 72 financial education events totaling 193 hours. Thirty-seven of these events were homebuyer and 35 were small business classes. A total of 401 participants attended these events, including 294 individuals and 107 small business owners. These events addressed an identified CD need in the area, namely financial literacy training for individuals and small business owners.
- In addition to financial education classes, bank employees provided 138 hours in assistance to four qualifying organizations in the AA. This assistance was provided through board or committee membership.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/14 to 12/31/17)	
	Investment, Service Tests and CD Loans: (01/01/14 to 12/31/17)	
Financial Institution	Products Reviewed	
TD Bank, N.A. Main Office: Wilmington, Delaware Headquarters: Cherry Hill, New Jersey	Home Mortgage Disclosure Act reported loans: Home Purchase, Home Refinance, and Home Improvement Loans. Small Business Loans. Community Development Loans, Qualified Investments, and Community Development Services. Retail Services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
TD Charitable Foundation TD Community Capital Group	Affiliate Affiliate	Qualified Investments

List of Assessment Areas and Type of Examination

Assessment Area and MSA # (Some AA's include portions of counties)	Type of Exam	Other Information (Reflects counties within aggregated AA's)
Assessment Areas		
Allentown-Bethlehem-Easton PA-NJ MMSA	10900	Full-Scope
Boston-Cambridge-Quincy MA-NH MMSA	14460	Full-Scope
New York-Newark-Jersey City NY-NJ MMSA	35620	Full-Scope
Philadelphia-Camden-Wilmington, PA- NJ-DE MMSA	37980	Full-Scope
Providence-New Bedford-Fall River RI- MA MMSA	39300	Full-Scope
		Includes Bristol County in MA (City of Attleboro, Towns of Easton, Mansfield, North Attleboro, Norton, Rehoboth and Seekonk only); Counties of Kent (City of Warwick and Town of West Warwick only), Providence, RI

Washington-Arlington-Alexandria DC-VA-MD MMSA	47900	Full-Scope	Excludes Calvert, Charles and Frederick Counties in MD; Clarke, Culpepper, Fauquier, Rappahannock, Spotsylvania, Stafford, and Warren Counties in VA, and Fredericksburg City, in VA
CONNECTICUT			
Hartford-W. Hartford-E. Hartford MSA	25540	Full-Scope	
New Haven-Milford MSA	35300	Full-Scope	
Bridgeport-Stamford-Norwalk MSA	14860	Limited-Scope	
Norwich-New London (partial) MSA	35980	Limited-Scope	Includes New London County (Towns of Colchester and Lebanon only)
Connecticut non-MSA	99999	Limited-Scope	Litchfield County
DELAWARE			
Dover MSA	20100	Full-Scope	
Salisbury MSA	41540	Limited-Scope	Includes Sussex County (City of Lewes and Town of Milton only)
FLORIDA			
Miami-Ft Lauderdale-Pompano B-Deerfield MSA	33100	Full-Scope	
Tampa-St. Petersburg-Clearwater MSA	45300	Full-Scope	Excludes Hernando County
Deltona-Daytona-Ormond Beach MSA	19660	Limited-Scope	Excludes Flagler County
Gainesville (partial) MSA	23540	Limited-Scope	Excludes Gilchrist County
Homosassa Spring MSA	26140	Limited-Scope	
Jacksonville (partial) MSA	27260	Limited-Scope	Excludes Clay and Nassau Counties
Lakeland-Winter Haven MSA	29460	Limited-Scope	
Naples-Immokalee-Marco Island MSA	34940	Limited-Scope	Includes Collier County (Cities of Naples and Everglades; Unincorporated communities of Chokoloskee, East Naples, Golden Gate, Island Walk, Lely Resort, Lely, Naples Manor, Naples Park, Ochopee, Pelican Bay, Pine Ridge, Plantation Island, Veronica Walk, and Vineyards only)
Ocala MSA	36100	Limited-Scope	
Orlando-Kissimmee-Sanford MSA	26740	Limited-Scope	
Palm Bay MSA	37340	Limited-Scope	
Port St Lucie MSA	38940	Limited-Scope	
Sebastian-Vero Beach MSA	42680	Limited-Scope	
Sebring MSA	42700	Limited-Scope	

Florida non-MSA	99999	Limited-Scope	Counties of Bradford, Columbia, Putnam, Suwannee, and Union
MAINE			
Portland-S. Portland MSA	38860	Full-Scope	
Maine non-MSA	99999	Full-Scope	Counties of Aroostook, Franklin, Hancock, Kennebec, Knox, Lincoln, Oxford, Somerset and Waldo
Bangor MSA	12620	Limited-Scope	
Lewiston-Auburn MSA	30340	Limited-Scope	
MARYLAND			
Baltimore-Columbia-Towson MSA	12580	Full-Scope	Excludes Carol and Queen Anne's Counties
MASSACHUSETTS			
Springfield MSA	44140	Full-Scope	
Worcester MSA	49340	Full-Scope	
Barnstable MSA	12700	Limited-Scope	
Pittsfield MSA	38340	Limited-Scope	
Massachusetts non-MSA	99999	Limited-Scope	Franklin County
NEW HAMPSHIRE			
Manchester-Nashua MSA	31700	Full-Scope	
New Hampshire non-MSA	99999	Full-Scope	Counties of Belknap, Carroll, Cheshire, Grafton, Merrimack and Sullivan
NEW JERSEY			
Atlantic City MSA	12100	Full-Scope	
Trenton MSA	45940	Full-Scope	
Ocean City MSA	36140	Limited-Scope	
Vineland-Bridgeton MSA	47220	Limited-Scope	
NEW YORK			
Albany-Schenectady-Troy (partial) MSA	10580	Full-Scope	Includes Counties of Albany, Rensselaer (Town of East Greenbush only), Saratoga, and Schenectady (Town of Niskayuna only)
Glens Falls MSA	24020	Limited-Scope	
Kingston (partial) MSA	28740	Limited-Scope	Includes Ulster County (City of Kingston, Towns of Saugerties, Ulster and Woodstock only)
New York non-MSA	99999	Limited-Scope	Clinton, Columbia, and Sullivan Counties
NORTH CAROLINA			
Asheville (partial) MSA	11700	Full-Scope	Excludes Madison County
Hickory-Lenoir-Morganton (partial) MSA	25860	Limited-Scope	Excludes Alexander, Caldwell and Catawba Counties

Wilmington MSA	48900	Limited-Scope	
North Carolina non-MSA	99999	Limited-Scope	Counties of Macon, McDowell, Mitchell, Polk, Rutherford and Yancey
SOUTH CAROLINA			
Greenville-Anderson-Mauldin MSA	24860	Full-Scope	
Augusta (partial) MSA	12260	Limited-Scope	Excludes Edgefield County
Charleston-N. Charleston MSA	16700	Limited-Scope	
Charlotte-Concord-Gastonia (partial) MSA	16740	Limited-Scope	Excludes Chester and Lancaster Counties
Columbia (partial) MSA	17900	Limited-Scope	Excludes Calhoun, Fairfield and Saluda Counties
Florence (partial) MSA	22500	Limited-Scope	Excludes Darlington County
Hilton Head-Bluffton-Bfrrt MSA	25940	Limited-Scope	
Myrtle Beach-Conway-N. Myrtle Beach MSA	34820	Limited-Scope	
Spartanburg (partial) MSA	43900	Limited-Scope	Excludes Union County
South Carolina non-MSA	99999	Limited-Scope	Georgetown, Greenwood, Marion, Newberry, and Oconee Counties
VERMONT			
Burlington-South Burlington MSA	15540	Full-Scope	
Vermont non-MSA	99999	Full-Scope	Bennington, Caledonia, Lamoille, Orleans, Rutland, Windham, Windsor and Washington Counties

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS TD BANK, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
TDBNA	Outstanding	Outstanding	High Satisfactory	Outstanding
Multistate Metropolitan Area or State:				
Allentown-Bethlehem-Easton PA-NJ MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Boston-Cambridge-Quincy MA-NH MMSA	Outstanding	Outstanding	Outstanding	Outstanding
New York-Newark-Jersey City NY-NJ MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Philadelphia-Camden-Wilmington PA-NJ-DE MMSA	High Satisfactory	Outstanding	High Satisfactory	High Satisfactory
Providence RI-MA MMSA	High Satisfactory	Outstanding	High Satisfactory	High Satisfactory
Washington-Arlington-Alexandria DC-MD-VA MMSA	Outstanding	Outstanding	Outstanding	Outstanding
Connecticut	Outstanding	Outstanding	High Satisfactory	Outstanding
Delaware	Outstanding	Outstanding	Low Satisfactory	Outstanding
Florida	Outstanding	Outstanding	Outstanding	Outstanding
Maine	Outstanding	Outstanding	Outstanding	Outstanding
Maryland	Outstanding	Outstanding	High Satisfactory	Outstanding
Massachusetts	Outstanding	Outstanding	Outstanding	Outstanding
New Hampshire	Outstanding	Outstanding	Outstanding	Outstanding
New Jersey	High Satisfactory	Outstanding	High Satisfactory	High Satisfactory
New York	Outstanding	Outstanding	Outstanding	Outstanding
North Carolina	Outstanding	Outstanding	Outstanding	Outstanding
South Carolina	High Satisfactory	Outstanding	Outstanding	Outstanding
Vermont	Outstanding	Outstanding	Outstanding	Outstanding

(*) The Lending Test is weighted more heavily than the investment and Service Tests in the overall rating.

Appendix C: Community Profiles for Full-Scope Areas

Allentown MMSA

Demographic Information for Full-Scope Area: Allentown MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	167	9.5	18.6	42.5	29.3	0.0
Population by Geography	755,924	8.5	17.3	39.9	34.4	0.0
Owner-Occupied Housing by Geography	207,400	3.9	12.6	44.7	38.8	0.0
Businesses by Geography	47,555	6.7	16.0	39.8	37.5	0.0
Farms by Geography	1,532	1.2	5.5	44.5	48.9	0.0
Family Distribution by Income Level	197,692	19.4	17.6	21.7	41.3	0.0
Household Distribution by Income Level	286,409	23.2	16.1	18.5	42.3	0.0
Median Family Income = \$68,935						
FFIEC Median Family Income for 2016 = \$70,900						
Households Below the Poverty Level = 7.3%						
					Median Housing Value (Dec. 2016) = \$186,800	
					Unemployment Rate (Dec. 2016) = 4.7%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Allentown MMSA was selected for a full-scope review. The Allentown MMSA AA is a portion of the full MMSA and consists of Lehigh and Northampton Counties in PA and Warren County, NJ in their entirety. Principle cities in the MMSA include Allentown, Bethlehem, and Easton, PA. The 2016 FFIEC adjusted median family income for this MMSA is approximately \$71 thousand, increasing from the 2010 level of approximately \$68.9 thousand.

Banking competition is moderate with 32 FDIC-insured depository institutions in the Allentown MMSA. TDBNA has limited presence in the MMSA with only eight branches and 10 deposit-taking ATMs. TDBNA has approximately \$562 million in deposits within this assessment area representing 0.4 percent of the bank's adjusted total domestic retail deposits. As of June 30, 2017, TDBNA ranked seventh with a deposit market share of 3.4 percent. Major banking competitors include Wells Fargo Bank, N.A., Branch Banking and Trust Company, PNC Bank, N.A., and Lafayette Ambassador Bank with deposit market shares of 20.5 percent, 12.2 percent, 12.0 percent, and 7.7 percent, respectively.

The MMSA ranks in the top ten nationally of jobs in transportation and warehousing due to low land costs, major highway infrastructure, and proximity to large northeast cities. Recent large scale investments by FedEx, Amazon, and Stitch Fix ensure the area's status as a logistics hub. The healthcare sector is a major employer along with leisure and hospitality. Some of the MMSA's largest employers are Lehigh Valley Health Network, St. Luke's University Health

Network, Air Products and Chemicals, Sands Bethworks Gaming LLC, and Dorney Park/Wildwater Kingdom.

The unemployment rate was 4.7 percent as of December 2016, up from 3.9 percent in December 2015. Housing prices have begun to stabilize with the median single-family housing value for the assessment area in 2016, approximately \$187 thousand. The city of Allentown is the primary economic driver in the MMSA, the third largest city, and the second fastest growing city in PA. A consequence of this growth is the influx of job seekers pushing up the cost of housing which is impacting LMI families seeking to purchase or rent affordable homes in the AA.

TDBNA offers full-scale retail services, loans, and deposits in the MMSA and offers a range of banking services to businesses, including small businesses; however, given its small scale presence, during the evaluation period, TDBNA made only 0.7 percent of their HMDA loans and 0.5 percent of their small business loans within the MMSA. There are opportunities for community development participation within the MMSA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Affordable housing for purchase or rent. Of particular mention is the need for affordable home improvement and rehab loans due to the age of the area's housing stock;
- Support for entrepreneurship and small business via loans for start-ups;
- Targeted financial education, including: home purchase counseling with special outreach to high-poverty neighborhoods;
- Increased bi-lingual customer service representatives to accommodate the influx of Spanish-speaking individuals; and
- The need for more bank locations in the urban LMI geographies to enhance accessibility.

Boston MMSA

Demographic Information for Full-Scope Area: Boston MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,006	10.4	19.0	40.1	28.8	1.7
Population by Geography	4,552,402	8.6	18.7	42.9	29.7	0.1
Owner-Occupied Housing by Geography	1,095,696	3.1	13.9	48.0	35.0	0.0
Businesses by Geography	336,015	6.0	13.3	41.4	39.1	0.2
Farms by Geography	6,461	1.8	9.7	49.9	38.6	0.0
Family Distribution by Income Level	1,097,113	22.1	16.7	20.7	40.6	0.0
Household Distribution by Income Level	1,735,175	25.7	14.8	17.4	42.1	0.0
Median Family Income = \$86,612						
FFIEC Median Family Income for 2016 = \$92,433						
Households Below the Poverty Level = 6.6%						
					Median Housing Value (Dec. 2016) = \$421,100	
					Unemployment Rate (Dec. 2016) = 2.5%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Boston MMSA was selected for a full-scope review. The Boston MMSA AA consists of the following three MDs: Cambridge-Newton-Framingham, MA; Boston, MA; and Rockingham County-Strafford County, NH. The 2016 FFIEC adjusted median family income for this MMSA is approximately \$92 thousand, increasing from the 2010 level of approximately \$86.6 thousand. The income levels of the three MDs are relatively consistent. The 2017 poverty level in the MMSA is 6.6 percent; however, per Zip Atlas, the poverty rates within cities within the MMSA are significantly higher, with Lawrence having the fourth highest poverty level in the state (33.6 percent), Chelsea the seventh highest (30.0 percent), and Boston the thirteenth highest (24.9 percent).

Banking competition is strong with 131 FDIC-insured depository institutions in the Boston MMSA. TDBNA has an established presence in the MMSA with 105 branches and 175 deposit-taking ATMs. TDBNA has approximately \$10.6 billion in deposits within this assessment area representing 7.2 percent of the bank's adjusted total domestic retail deposits. As of June 30, 2017, TDBNA ranked fifth with a deposit market share of 3.7 percent. Major banking competitors include State Street Bank and Trust Company, Bank of America, N.A., Citizen's Bank N.A., and Santander Bank N.A. with deposit market shares of 26.1 percent, 22.1 percent, 11.9 percent, and 5.0 percent, respectively.

The MMSA is home to a diverse mix of businesses, with many national and international corporations headquartered there, especially those in the financial services industry. The healthcare, education, and technology sectors are also major employers. Some of the MMSA's largest employers are Partners HealthCare, the University of Massachusetts, Stop &

Shop Supermarkets Co., Steward Healthcare System, Beth Israel Deaconess Medical Center, and State Street Corp.

The MMSA economy has improved somewhat following the recession that began in late 2008 at a pace in excess of the nation. The unemployment rate is low at 2.5 percent as of December 2016, down from 4.0 percent in December 2015. Housing prices have also rebounded at a faster pace than the national average due in part to the pressures on the market from employees with higher paying jobs in the financial services, healthcare, education, and technology sectors seeking housing. This pressure is pricing out many LMI and middle-income individuals. The median single-family housing value for the assessment area in 2016 was approximately \$421.1 thousand. The high cost of living associated with this area continues to make home ownership difficult. Housing in the Boston MMSA AA is characterized by high costs with a critical reliance on rental housing. Because of the disparity between income and area housing costs, LMI families face significant challenges to purchase or rent affordable homes in the AA.

TDBNA offers full-scale retail services, loans, and deposits in the MMSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, TDBNA made 7.1 percent of their HMDA loans and 5.8 percent of their small business loans within the MMSA. There are opportunities for community development participation within the MMSA with numerous community development and governmental organizations representing affordable housing, economic development, and services to low- and moderate-income families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Affordable housing for purchase or rent. Multiple contacts noted the pressures on home prices and rental costs due to the high level of white collar employers in the area, which is displacing LMI individuals;
- Lending products to compete with high cost and predatory products in the market as well as those tailored to help reduce overdraft fees;
- Targeted financial education, especially home purchase counseling that is available one-on-one and over the long term as it takes time for LMI individuals to save for the down-payment and prepare for the home purchase process; and
- Nonprofit capacity building both financially and via volunteerism.

New York MMSA

Demographic Information for Full-Scope Area: New York MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	4,681	10.8	22.2	32.3	32.9	1.9
Population by Geography	19,510,041	11.1	23.0	30.7	35.0	0.2
Owner-Occupied Housing by Geography	3,754,778	2.3	13.1	35.9	48.7	0.0
Businesses by Geography	1,290,522	6.6	16.7	29.6	45.9	1.2
Farms by Geography	20,315	1.9	11.1	35.7	51.2	0.2
Family Distribution by Income Level	4,670,479	23.6	16.1	18.2	42.0	0.0
Household Distribution by Income Level	7,018,823	26.1	14.9	16.5	42.5	0.0
Median Family Income = \$86,540						
FFIEC Median Family Income for 2016 = \$92,125						Median Housing Value (Dec. 2016) = \$388,500
Households Below the Poverty Level = 9.9%						Unemployment Rate (Dec. 2016) = 4.1%

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The New York MMSA was selected for a full-scope review. The New York MMSA AA consists of the following four MDs: Newark, NJ-PA; Nassau County-Suffolk County, NY; Dutchess County-Putnam County, NY; and New York-Jersey City-White Plains, NY-NJ. The 2016 FFIEC adjusted median family income for this MMSA is approximately \$92 thousand, increasing from the 2010 level of approximately \$86.5 thousand. However, there are significant disparities in the income levels of the four MDs ranging from \$72.6 thousand in the New York-Jersey City-White Plains, NY-NJ MD to \$106.2 thousand in the Nassau County-Suffolk County, NY MD. These disparities are also reflected in the poverty levels. Per the “New York State Annual Poverty Report” for 2017, the 2017 poverty levels found within the counties of the New York-Jersey City-White Plains, NY-NJ MD are among the highest in the state, with Bronx County having the highest poverty level in the state (30.7 percent) and Kings County the second highest (23.2 percent). The poverty levels of the counties in Nassau County-Suffolk County, NY MD are ranked 61st and 59th out of 62 counties in New York State.

Banking competition is very strong with 210 FDIC-insured depository institutions in the New York MMSA. TDBNA has a relatively large presence in the MMSA with 409 branches and 817 deposit-taking ATMs. TDBNA has approximately \$58.5 billion in deposits within this assessment area representing 39.7 percent of the bank’s adjusted total domestic retail deposits. As of June 30, 2017, TDBNA ranked seventh with a deposit market share of 3.4 percent. Major banking competitors include JPMorgan Chase Bank, Bank of America, Citibank, and HSBC with deposit market shares of 32.9 percent, 6.9 percent, 6.5 percent, and 6.0 percent, respectively.

The MMSA is home to a diverse mix of businesses, with many national and international corporations headquartered there, especially those in the financial services industry. The retail sector is also a major employer along with health and social care. Some of the MMSA's largest employers are JPMorgan Chase, Mount Sinai Medical Center, Macy's Inc., Citibank, N.A., and New York Presbyterian Healthcare Systems.

The MMSA economy has improved somewhat following the recession that began in late 2008. The unemployment rate at 4.1 percent as of December 2016, is down slightly from 4.5 percent in December 2015. Housing prices experienced a rebound with the median single-family housing value for the assessment area in 2016 approximately \$389 thousand. The high cost of living associated with this area continues to make home ownership difficult. Consequently, housing in the New York metropolitan area is characterized by high costs, low home-ownership rates, and a critical reliance on rental housing, including federally subsidized rental housing. Because of the disparity between income and area housing costs, LMI families face significant challenges to purchase or rent affordable homes in the AA.

TDBNA offers full-scale retail services, loans, and deposits in the MMSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, TDBNA made 25.4 percent of their HMDA loans and 46.0 percent of their small business loans within the MMSA. The opportunities for community development participation within the MMSA are quite broad. There are numerous community development and governmental organizations representing affordable housing, economic development, and services to low- and moderate-income families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Affordable housing for purchase or rent. Multiple contacts noted the high property taxes in the MMSA as a barrier to home purchase for LMI individuals, which will likely be exacerbated with the tax changes effective with the 2018 tax year;
- Foreclosure prevention efforts and loss mitigation strategies as New York is a judicial foreclosure state which requires a long time to finalize proceedings and has prolonged recovery;
- Support for entrepreneurship and small business especially via micro-loans;
- Targeted financial education, including: housing/home purchase counseling with special outreach to high-poverty neighborhoods; small business development and financial education/technical assistance related to starting a new business; and the role of creditworthiness in gaining access to capital; and
- Nonprofit capacity building both financially and via volunteerism with institutions playing an ongoing role.

Philadelphia MMSA

Demographic Information for Full-Scope Area: Philadelphia MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,457	7.3	23.0	38.5	29.9	1.3
Population by Geography	5,864,235	6.8	22.1	39.1	31.7	0.3
Owner-Occupied Housing by Geography	1,520,242	3.6	18.6	42.7	35.1	0.0
Businesses by Geography	407,442	4.0	17.2	38.2	40.1	0.5
Farms by Geography	8,835	1.0	13.3	47.2	38.3	0.1
Family Distribution by Income Level	1,422,874	21.1	17.5	21.0	40.4	0.0
Household Distribution by Income Level	2,180,581	24.6	15.7	17.8	41.9	0.0
Median Family Income = \$76,947						
FFIEC Median Family Income for 2016 = \$79,775						
Households Below the Poverty Level = 8.4%						
					Median Housing Value (Dec. 2016) = \$225,400	
					Unemployment Rate (Dec. 2016) = 4.4%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Philadelphia MMSA was selected for a full-scope review. The Philadelphia MMSA AA consists of the following four MDs: Philadelphia, PA; Wilmington, DE; Camden, NJ; and Montgomery County-Bucks County-Chester County, PA. The 2016 FFIEC adjusted median family income for this MMSA is approximately \$80 thousand, increasing from the 2010 level of approximately \$76.9 thousand. However, there are significant disparities in the income levels of the four MDs ranging from \$55.4 thousand in the Philadelphia MD to \$99.5 thousand in the Montgomery County-Bucks County-Chester County, PA MD. These disparities are also reflected in the poverty levels. The 2016 poverty level in the primary metro-area of the MMSA, the City of Philadelphia, is 25.7 percent while the poverty levels in Montgomery, Bucks, and Chester Counties are 6.2, 6.6, and 7.3 percent respectively.

Banking competition is strong with 123 FDIC-insured depository institutions in the Philadelphia MMSA. TDBNA has an established presence in the MMSA with 142 branches and 259 deposit-taking ATMs. TDBNA has approximately \$30.8 billion in deposits within this assessment area representing 20.9 percent of the bank's adjusted total domestic retail deposits. Per the FDIC, as of June 30, 2017, TDBNA ranked second with a deposit market share of 22.6 percent; however, the FDIC calculation is overstated as it includes TD Ameritrade deposits. A more accurate assessment places TDBNA fifth with a deposit share of closer to 6.5 percent. Major banking competitors include Capital One, N.A., Chase Bank USA, N.A., and Wells Fargo Bank, N.A. with deposit market shares of 24.6 percent, 9.3 percent, and 7.0 percent, respectively.

The MMSA is home to a diverse mix of businesses, with the higher education and healthcare leading employment sectors, as these industries account for approximately 30 percent of area employment, more than twice the national average. Some of the MMSA's largest employers are University of Pennsylvania Health System, Thomas Jefferson University, Comcast, Drexel University, and Aramark Corporation.

The MMSA economy has improved somewhat following the recession that began in late 2008. Housing prices continue to rebound with the median single-family housing value for the assessment area in 2016 approximately \$225.4 thousand. The disparity between income and area housing costs are a significant challenge to LMI families in their ability to purchase or rent affordable homes in the AA. The unemployment rate of 4.4 percent as of December 2016, is up slightly from 4.1 percent in December 2015.

TDBNA offers full-scale retail services, loans, and deposits in the MMSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, TDBNA made 12.6 percent of their HMDA loans and 13.1 percent of their small business loans within the MMSA. The opportunities for community development participation within the MMSA are broad. There are numerous community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Affordable quality rental housing and home improvement loans. Multiple contacts noted the aging housing stock in need of improvements as well as the high number of vacant residential properties;
- Lending products to compete with high cost and predatory products in the market, products for the unbanked, and those tailored to help reduce overdraft fees;
- Targeted financial education, especially home purchase counseling coupled with financial assistance programs; and
- Nonprofit capacity building especially through bridge lines of credit.

Providence MMSA

Demographic Information for Full-Scope Area: Providence MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	210	11.9	22.4	37.1	28.1	0.5
Population by Geography	951,367	10.1	21.3	37.0	31.5	0.0
Owner-Occupied Housing by Geography	225,423	3.7	14.3	43.1	38.9	0.0
Businesses by Geography	56,139	7.5	20.0	37.5	34.9	0.1
Farms by Geography	1,236	1.9	10.3	36.7	51.1	0.0
Family Distribution by Income Level	231,122	22.9	17.3	19.8	40.0	0.0
Household Distribution by Income Level	363,796	26.3	15.1	16.8	41.8	0.0
Median Family Income = \$70,496						
FFIEC Median Family Income for 2016 = \$73,100						
Households Below the Poverty Level = 8.9%						
					Median Housing Value (Dec. 2016) = \$264,200	
					Unemployment Rate (Dec. 2016) = 4.2%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Providence MMSA was selected for a full-scope review. The Providence MMSA AA is a portion of the full MMSA and is defined to include Bristol County and Providence County, RI in their entirety; the cities of Warwick and West Warwick, RI; and the cities of Attleboro, Mansfield, and North Attleboro, MA. The 2016 FFIEC adjusted median family income for this MMSA is approximately \$73.1 thousand, increasing from the 2010 level of approximately \$70.5 thousand.

Banking competition is moderate with 30 FDIC-insured depository institutions in the Providence MMSA. TDBNA has a relatively small presence in the MMSA with only nine branches and 17 deposit-taking ATMs. TDBNA has approximately \$451 million in deposits within this assessment area representing 0.3 percent of the bank's adjusted total domestic retail deposits. As of June 30, 2017, TDBNA ranked fourteenth with a deposit market share of 1.2 percent. Major banking competitors include Citizen's Bank, N.A., Bank of America, N.A., Santander Bank, N.A., and The Washington Trust Company of Westerly with deposit market shares of 30.2 percent, 22.9 percent, 8.8 percent, and 7.3 percent, respectively.

The MMSA's major employment sectors are healthcare, higher education, and defense. Some of the MMSA's largest employers are Lifespan, Care New England, CVS Health Corp., Citizen's Financial Group, and General Dynamics Electric Boat. The unemployment rate at 4.2 percent as of December 2016, is down from 5.2 percent in December 2015.

Housing prices have begun to stabilize with the median single-family housing value for the assessment area in 2016 is approximately \$264 thousand. The cost of housing makes home ownership challenging for LMI families with income of \$36.5 thousand or less.

TDBNA offers full-scale retail services, loans, and deposits in the MMSA and offers a range of banking services to businesses, including small businesses; however, given its limited branch presence, during the evaluation period, TDBNA made only 0.7 percent of their HMDA loans and 0.5 percent of their small business loans within the MMSA. There are opportunities for community development participation within the MMSA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Affordable housing for purchase or rent. Particularly mentioned was the need for multifamily housing and affordable home improvement loans;
- Access to capital for small businesses;
- Financial education, including housing/home purchase counseling for LMI individuals and financial literacy targeted to small businesses;
- Workforce development programs; and
- Financial and volunteer support for local community development organizations.

Washington MMSA

Demographic Information for Full-Scope Area: Washington MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,132	10.1	23.9	31.0	34.1	0.9
Population by Geography	4,667,543	9.3	23.4	32.1	35.1	0.2
Owner-Occupied Housing by Geography	1,088,004	4.1	18.4	35.4	42.1	0.0
Businesses by Geography	382,149	4.5	18.4	31.8	44.8	0.5
Farms by Geography	5,298	3.4	16.2	34.3	46.1	0.0
Family Distribution by Income Level	1,075,226	20.9	16.8	20.4	41.9	0.0
Household Distribution by Income Level	1,699,175	21.8	16.9	18.9	42.4	0.0
Median Family Income = \$100,486		Median Housing Value (Dec. 2016)				\$390,600
FFIEC Median Family Income 2016 = \$105,700		Unemployment Rate (Dec. 2016)				= 3.4%
Households Below the Poverty Level = 5.0%						

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Washington MMSA was selected for a full-scope review. The Washington MMSA AA consists of the complete MMSA, excluding Calvert, Charles, and Frederick Counties in Maryland; Clarke, Culpepper, Fauquier, Rappahannock, Spotsylvania, Stafford, and Warren Counties in Virginia, and Fredericksburg City, VA. The 2016 FFIEC adjusted median family income for this MMSA was approximately \$105.7 thousand, increasing from the 2010 level of approximately \$100.5 thousand. The 2017 the poverty level in the MMSA is relatively low at 5.0 percent; however, the poverty rate within the city of Washington, DC is significantly higher at 18.6 percent.

Banking competition is strong with 81 FDIC-insured depository institutions in the Washington MMSA. TDBNA has an established presence in the MMSA with 50 branches and 74 deposit-taking ATMs. TDBNA has approximately \$3.2 billion in deposits within this assessment area representing 2.1 percent of the bank's adjusted total domestic retail deposits. As of June 30, 2017, TDBNA ranked 12th with a deposit market share of 1.6 percent. Major banking competitors include E*Trade Bank, Bank of America, N.A., Wells Fargo Bank, N.A., and Capital One N.A. with deposit market shares of 16.8 percent, 13.3 percent, 13.1 percent, and 11.5 percent, respectively.

The healthcare, education, and technology sectors are major employers in the MMSA. Some of the MMSA's largest employers are the Federal Government, General Dynamics, Lockheed Martin, Capital One, and AES Corporation.

The MMSA economy has improved following the recession that began in late 2008 with a relatively low unemployment rate of 3.4 percent as of December 2016, down from 3.9 percent

in December 2015. Housing prices have also rebounded at a faster pace than the nation with the median single-family housing value for the assessment area in 2016 of approximately \$390.6 thousand. The high cost of living associated with this area continues to make home ownership difficult, especially for LMI families. Housing in the Washington MMSA is characterized by high costs with a critical reliance on rental housing.

TDBNA offers full-scale retail services, loans, and deposits in the MMSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, TDBNA made 5.0 percent of their HMDA loans and 2.8 percent of their small business loans within the MMSA. There are opportunities for community development participation within the MMSA with numerous community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Affordable housing for purchase or rent. Multiple contacts noted the pressures on home prices and rental costs due to the gentrification of LMI and middle-income neighborhoods, which is raising housing costs and displacing existing residents;
- Support for small businesses via micro-loans and loans for start-ups;
- Targeted financial education, including housing/home purchase counseling with special outreach to high-poverty neighborhoods with focus on gaining trust of the communities.
- Increased bi-lingual customer service representatives to accommodate the influx of Spanish-speaking individuals; and
- Financial support for local community development organizations.

Hartford CT MSA

Demographic Information for Full-Scope Area: Hartford CT MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	290	15.9	14.5	39.3	28.3	2.1
Population by Geography	1,212,381	11.8	14.0	41.6	31.3	1.3
Owner-Occupied Housing by Geography	323,477	3.6	11.1	46.7	38.6	0.0
Businesses by Geography	88,017	9.2	11.0	42.0	37.4	0.4
Farms by Geography	2,678	2.8	6.8	43.6	46.7	0.0
Family Distribution by Income Level	310,244	21.4	17.0	22.1	39.6	0.0
Household Distribution by Income Level	469,052	24.7	15.6	17.9	41.7	0.0
Median Family Income = \$82,299						
FFIEC Median Family Income for 2016 = \$86,000						
Households Below the Poverty Level = 6.7%						
					Median Housing Value (Dec. 2016) = \$231,100	
					Unemployment Rate (Dec. 2016) = 3.9%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Hartford MSA was selected for a full-scope review. The Hartford MSA AA consists of the complete counties of Hartford, Middlesex, New Loudon, and Tolland in Connecticut. The 2016 FFIEC adjusted median family income for this MSA is \$86 thousand, increasing from the 2010 level of approximately \$82.3 thousand. The 2017 the poverty level in the MSA is 6.7 percent; however, the poverty rate within the city of Hartford, CT is significantly higher at approximately 35.0 percent, one of the highest in the nation.

There are 30 FDIC-insured depository institutions in the Hartford MSA. TDBNA has a modest presence in the MSA with 24 branches and 32 deposit-taking ATMs. TDBNA has approximately \$2.9 billion in deposits within this assessment area representing 42.6 percent of the bank's adjusted total domestic retail deposits in the Connecticut rating area. As of June 30, 2017, TDBNA ranked fourth with a deposit market share of 6.4 percent. Major banking competitors include Bank of America, N.A., Webster Bank, N.A., and United Bank with deposit market shares of 42.5 percent, 10.1 percent and 7.6 percent, respectively.

The MSA employment is dependent on the insurance sector, with aerospace and technology sectors also major employers. Some of the MSA's largest employers are Hartford Health Care, Pratt & Whitney/United Technologies, University of Connecticut, The Travelers Cos. Inc., and Hartford Hospital.

The MSA economy has improved following the recession that began in late 2008 though at a slower rate than that of the nation. The unemployment rate was 3.9 percent as of December 2016, down from 5.0 percent in December 2015. Housing prices have also rebounded at a slower pace than the nation with the median single-family housing value for the assessment

area in 2016 of approximately \$231.1 thousand. Despite lagging home prices, home ownership continues to remain difficult, especially for LMI families and there is a critical reliance on rental housing.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, TDBNA made 38.9 percent of their HMDA loans and 34.0 percent of their small business loans in the Connecticut rating area within the Hartford MSA. There are opportunities for community development participation within the MSA with numerous community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent;
- Increased job training and support for entrepreneurial programs;
- Financial literacy programs including home purchase counseling and general household budgeting; and
- Financial support for local community development organizations.

New Haven CT MSA

Demographic Information for Full-Scope Area: New Haven CT MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	189	14.3	21.2	35.4	29.1	0.0
Population by Geography	362,477	11.1	22.0	35.6	31.4	0.0
Owner-Occupied Housing by Geography	216,131	3.5	16.6	40.5	39.4	0.0
Businesses by Geography	63,206	8.5	15.3	39.9	37.3	0.0
Farms by Geography	1,533	3.6	11.4	32.7	52.3	0.0
Family Distribution by Income Level	217,115	22.9	16.7	19.8	40.6	0.0
Household Distribution by Income Level	330,785	25.7	15.1	17.2	42.0	0.0
Median Family Income = \$77,379						
FFIEC Median Family Income for 2016 = \$81,000						
Households Below the Poverty Level = 7.9%						
					Median Housing Value (Dec. 2016) = \$219,700	
					Unemployment Rate (Dec. 2016) = 3.9%	

(*) The NA category consists of geographies that have not been assigned an income classification.
 Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The New Haven MSA was selected for a full-scope review. The New Haven MSA AA consists of New Haven County, Connecticut in its entirety. The 2016 FFIEC adjusted median family income for this MSA is approximately \$81 thousand, increasing from the 2010 level of approximately \$77.3 thousand. The 2017 poverty level in the MSA is 7.9 percent.

There are 25 FDIC-insured depository institutions in the Hartford MSA. TDBNA has a modest presence in the MSA with 22 branches and 27 deposit-taking ATMs. TDBNA has approximately \$1.7 billion in deposits within this assessment area representing 25.4 percent of the bank’s adjusted total domestic retail deposits in the Connecticut rating area. As of June 30, 2017, TDBNA ranked sixth with a deposit market share of 6.2 percent. Major banking competitors include Webster Bank, N.A., Well Fargo Bank, N.A., Bank of America, N.A., and People’s Bank with deposit market shares of 37.5 percent, 11.5 percent, 11.2 percent, and 8.3 percent, respectively.

The higher-education sector is the core of MSA employment, with healthcare and transportation/warehousing sectors also major employers. Some of the MSA’s largest employers are Yale New Haven Health System, Yale New Haven Hospital, Yale University, Verizon, and Alexion.

The MSA economy has improved somewhat following the recession that began in late 2008; however, per Moody’s, mortgages in the MSA continue to default well above the national rate. The unemployment rate was 3.9 percent as of December 2016, down from 4.9 percent in December 2015. Housing prices have also rebounded; however, they remain 17.0 percent below their pre-recession peak with the median single-family housing value for the assessment

area in 2016 at approximately \$219.7 thousand. Home ownership continues to remain difficult, especially for LMI families and there is a critical reliance on affordable, quality rental housing.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, TDBNA made 23.1 percent of their HMDA loans and 30.4 percent of their small business loans in the Connecticut rating area within the New Haven MSA. There are opportunities for community development participation within the MSA with numerous community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent;
- Flexible lending programs including low cost home improvement loans for housing rehabilitation;
- Increased job training and support for entrepreneurial programs;
- Financial literacy programs including home purchase counseling and general household budgeting; and
- Financial support for local community development organizations.

Dover DE MSA

Demographic Information for Full-Scope Area: Dover DE MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	32	0.0	15.6	68.8	15.6	0.0
Population by Geography	162,310	0.0	12.2	73.7	14.1	0.0
Owner-Occupied Housing by Geography	41,836	0.0	9.2	75.3	15.5	0.0
Businesses by Geography	9,325	0.0	20.2	65.0	14.8	0.0
Farms by Geography	575	0.0	8.3	77.2	14.4	0.0
Family Distribution by Income Level	40,711	18.7	18.4	23.3	39.6	0.0
Household Distribution by Income Level	57,396	22.6	17.1	20.3	40.0	0.0
Median Family Income = \$60,949						
FFIEC Median Family Income for 2016 = \$62,900						
Households Below the Poverty Level = 9.3%						
					Median Housing Value (Dec. 2016)	\$198,200
					Unemployment Rate (Dec. 2016)	= 4.0%

(*) The NA category consists of geographies that have not been assigned an income classification.
 Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Dover MSA was selected for a full-scope review. The Dover MSA AA consists of Kent County, Delaware in its entirety. The 2016 FFIEC adjusted median family income for this MSA is approximately \$62.9 thousand, increasing from the 2010 level of approximately \$60.9 thousand with the 2017 the poverty level in the MSA at 9.3 percent.

Banking competition is modest with 11 FDIC-insured depository institutions in the Dover MSA. TDBNA has a minimal presence in the MSA with only two branches and two deposit-taking ATMs. TDBNA has approximately \$73.4 million in deposits within this assessment area representing 70.9 percent of the bank’s adjusted total domestic retail deposits in the Delaware rating area (excluding deposits attributable to Wilmington, which is part of the Philadelphia MMSA). As of June 30, 2017, TDBNA ranked seventh with a deposit market share of 4.4 percent. Major banking competitors include Manufacturers and Traders Trust Company, PNC Bank, N.A., Wilmington Savings Fund Society, FSB, and Citizens Bank, N.A., with deposit market shares of 27.3 percent, 20.8 percent, 16.7 percent, and 10.9 percent, respectively.

The government and military sector is the core of MSA employment, with healthcare and hospitality sectors also major employers. Some of the MSA’s largest employers are the State of Delaware, Dover Air Force Base, Bayhealth Medical Center, and Perdue Farms.

The MSA economy has improved somewhat following the recession that began in late 2008. The unemployment rate was 4.0 percent as of December 2016, down from 4.3 percent in December 2015. Housing prices have also rebounded with 2017 appreciation the highest in a decade, exceeding the national rate for the first time since 2010, with the median single-family housing value for the assessment area in 2016 of approximately \$198.2 thousand. Home

ownership continues to remain difficult, especially for LMI families with annual income of approximately \$31.5 thousand or less.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, 56.8 percent of TDBNA's HMDA loans and 74.0 percent of their small business loans in the Delaware rating area were made within the Dover MSA. There are opportunities for community development participation within the MSA with numerous community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent as well as support for non-profit affordable housing developers;
- Support for small businesses via micro-loans and affordable low-limit lines of credit;
- Financial literacy programs including home purchase counseling and foreclosure prevention; and
- Financial support for local community development organizations.

Miami FL MSA

Demographic Information for Full-Scope Area: Miami FL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,216	5.8	25.9	33.3	32.8	2.1
Population by Geography	5,564,635	4.7	27.3	34.6	33.1	0.3
Owner-Occupied Housing by Geography	1,329,038	2.1	23.1	36.3	38.5	0.0
Businesses by Geography	764,572	3.3	21.9	30.3	43.6	0.8
Farms by Geography	11,984	3.0	22.7	31.6	42.5	0.3
Family Distribution by Income Level	1,317,377	22.4	17.3	18.9	41.3	0.0
Household Distribution by Income Level	2,019,604	24.5	16.1	17.0	42.4	0.0
Median Family Income = \$59,043						
FFIEC Median Family Income for 2016 = \$58,133						Median Housing Value (Dec. 2016) = \$305,000
Households Below the Poverty Level = 11.0%						Unemployment Rate (Dec. 2016) = 4.9%

(*) The NA category consists of geographies that have not been assigned an income classification.
 Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Miami MSA was selected for a full-scope review. The Miami MSA AA consists of the Miami-Miami Beach-Kendall; Fort Lauderdale-Pompano Beach-Deerfield Beach; and West Palm Beach-Boca Raton-Delray Beach MDs. The 2016 FFIEC adjusted median family income for this MSA is approximately \$58.1 thousand, decreasing from the 2010 level of approximately \$59.0 thousand; however there is a significant range between the MDs with the Miami-Miami Beach-Kendall MD at \$48.1 thousand and West Palm Beach-Boca Raton-Delray Beach at \$65.4 thousand. Among the top 25 metro areas in the U.S., Miami has the second-lowest median household income, just ahead of Tampa, with the two remaining in the bottom but switching places under the updated 2016 data. The 2017 poverty level in the MSA is 11.0 percent; however, the poverty rate within Miami-Dade County and City of Miami, FL is significantly higher at approximately 18.2 and 27.6 percent, respectively.

Banking competition is strong with 99 FDIC-insured depository institutions in the Miami MSA. TDBNA has an established presence in the MSA with 73 branches and 121 deposit-taking ATMs. TDBNA has approximately \$6.3 billion in deposits within this assessment area representing 54.0 percent of the bank’s adjusted total domestic retail deposits in the Florida rating area. As of June 30, 2017, TDBNA ranked seventh with a deposit market share of 3.1 percent. Major banking competitors include Bank of America, N.A., Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., and Citibank, N.A., with deposit market shares of 17.0 percent, 15.7 percent, 8.6 percent, and 8.4 percent, respectively.

The leisure and hospitality sectors are the center of the MSA economy with the world’s three largest cruise lines: Carnival, Royal Caribbean, and Norwegian Cruise Lines all headquartered there. The healthcare sector is also a major employer. Some of the MSA’s largest employers

are the University of Miami, Jackson Health Systems, Publix Supermarkets, and Baptist Health Systems.

The MSA economy has improved somewhat following the recession that began in late 2008. The unemployment rate was 4.9 percent as of December 2016, down slightly from 5.0 percent in December 2015. The median single-family housing value for the assessment area in 2016 of approximately \$305 thousand makes home ownership difficult, especially for LMI families with annual income of approximately \$29 thousand or less.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, 36.9 percent of TDBNA's HMDA loans and 56.4 percent of small business loans in the Florida rating area were made within the Miami MSA. There are opportunities for community development participation within the MSA with numerous community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent. Multiple contacts noted the pressures on housing prices caused by foreign buyers that are buying properties for cash for their own use or as investment properties;
- Flexible lending products to fund smaller multi-family affordable housing development not just larger LIHTC deals;
- Support for small businesses via improved access to financing;
- Financial education programs including small business technical assistance and working with individuals to improve their credit and improve cash flow; and
- Financial support for local community development organizations.

Tampa FL MSA

Demographic Information for Full-Scope Area: Tampa FL MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	698	4.7	25.4	39.8	28.8	1.3
Population by Geography	2,610,465	3.9	24.6	40.0	31.4	0.2
Owner-Occupied Housing by Geography	723,829	1.9	21.4	42.1	34.6	0.0
Businesses by Geography	271,354	2.9	20.6	37.8	38.5	0.2
Farms by Geography	6,645	2.4	22.1	41.9	33.6	0.0
Family Distribution by Income Level	649,472	20.6	18.2	19.6	41.6	0.0
Household Distribution by Income Level	1,052,909	22.7	16.7	18.5	42.1	0.0
Median Family Income = \$57,333						
FFIEC Median Family Income for 2016 = \$59,200						Median Housing Value (Dec. 2016) = \$198,000
Households Below the Poverty Level = 9.5%						Unemployment Rate (Dec. 2016) = 4.5%

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Tampa MSA was selected for a full-scope review. The Tampa MSA AA consists of the Hernando, Hillsborough, Pasco, and Pinellas counties. The 2016 FFIEC adjusted median family income for this MSA is approximately \$59.2 thousand, increasing from the 2010 level of approximately \$57.3 thousand. The 2017 poverty level in the MSA is 9.5 percent.

Banking competition is strong with 63 FDIC-insured depository institutions in the Tampa MSA. TDBNA has a moderate presence in the MSA with 15 branches and 21 deposit-taking ATMs. TDBNA has approximately \$925 million in deposits within this assessment area representing 7.9 percent of the bank's adjusted total domestic retail deposits in the Florida rating area. As of June 30, 2017, TDBNA ranked 12th with a deposit market share of 1.3 percent. Major banking competitors include Raymond James Bank, N.A., Bank of America, N.A., Wells Fargo Bank, N.A., and SunTrust Bank, N.A., with deposit market shares of 21.3 percent, 16.9 percent, 12.4 percent, and 11.4 percent, respectively.

The leisure and hospitality, healthcare, and retail are vital sectors to the MSA economy. Some of the MSA's largest employers are the Publix Super Markets, BayCare Health Systems, HCA Holdings, and MacDill Air Force Base.

The MSA economy has improved somewhat following the recession that began in late 2008. The unemployment rate was 4.5 percent as of December 2016, with no change from December 2015. The median single-family housing value for the assessment area in 2016 of approximately \$198 thousand makes home ownership difficult, especially for LMI families with annual income of approximately \$29.6 thousand or less.

TDBNA offers full-scale retail services, loans, and deposits in the MSA, and offers a range of banking services to businesses, including small businesses. During the evaluation period, 8.3 percent of TDBNA's HMDA loans and 7.7 percent of small business loans in the Florida rating area were made within the Tampa MSA. While there are opportunities for community development participation within the MSA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families, community development efforts in the MSA have been historically hampered by political resistance to regional partnerships. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent. Multiple contacts noted the lack of available stock and the need for additional affordable housing, especially multifamily developments;
- Flexible and affordable lending and deposit products for LMI individuals and the under- or un-banked;
- Support for small businesses via access to small dollar loans and financial education;
- Financial education programs for LMI individuals, including foreclosure prevention programs; and
- Financial support for local community development organizations.

Portland ME MSA

Demographic Information for Full-Scope Area: Portland ME MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	115	2.6	15.7	60.	20.9	0.9
Population by Geography	514,098	1.6	12.9	61.9	23.6	0.0
Owner-Occupied Housing by Geography	151,579	0.3	10.4	63.2	26.1	0.0
Businesses by Geography	33,436	8.0	10.4	57.0	24.6	0.0
Farms by Geography	1,112	2.7	7.5	64.0	25.8	0.0
Family Distribution by Income Level	135,937	19.0	18.3	23.6	39.2	0.0
Household Distribution by Income Level	211,636	23.3	16.1	19.5	41.1	0.0
Median Family Income = \$67,971						
FFIEC Median Family Income for 2016 = \$73,600						
Households Below the Poverty Level = 6.3%						
					Median Housing Value (Dec. 2016) = \$248,700	
					Unemployment Rate (Dec. 2016) = 2.6%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Portland MSA was selected for a full-scope review. The Portland MSA AA consists of Cumberland, Sagadahoc, and York counties in Maine. The 2016 FFIEC adjusted median family income for this MSA is approximately \$73.6 thousand, increasing from the 2010 level of approximately \$67.9 thousand. The 2017 poverty level in the MSA is 6.3 percent.

There are 21 FDIC-insured depository institutions in the Portland MSA. TDBNA has 23 branches and 32 deposit-taking ATMs in the MSA, with approximately \$2.1 billion in deposits within this assessment area representing 46.8 percent of the bank's adjusted total domestic retail deposits in the Maine rating area. As of June 30, 2017, TDBNA ranked first with a deposit market share of 17.2 percent. Major banking competitors include Bank of America, N.A., Key Bank, N.A., and Kennebunk Savings Bank, with deposit market shares of 15.3 percent, 13.4 percent, and 7.0 percent, respectively.

The healthcare sector is a major employer in the area with Maine having the largest share of the nation's baby boomers and highest median age of residents. The leisure and hospitality and retail sectors are also major employers. Some of the MSA's largest employers are Maine Health, LL Bean, Inc., Bath Iron Works, and Unum Provident.

The MSA economy has improved following the recession that began in late 2008, the jobless rate is at a near record low with the unemployment rate of 2.6 percent as of December 2016, down slightly from 2.9 percent in December 2015. The median single-family housing value for the assessment area in 2016 is approximately \$248.7 thousand making home ownership difficult, especially for LMI families with annual income of approximately \$38.8 thousand, or less.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, 51.8 percent of TDBNA's HMDA loans and 53.6 percent of small business loans in the Maine rating area were made within the Portland MSA. There are opportunities for community development participation within the MSA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent, especially for seniors. It was noted that some programs have multiyear waiting periods just for housing vouchers, with no guarantee housing will then be available;
- Affordable home improvement loans for home repair and maintenance;
- Support for small businesses via improved access to financing;
- Financial education programs including small business technical assistance and working with individuals to improve their credit and improve cash flow; and
- Financial support for local community development organizations.

Non-MSA Maine

Demographic Information for Full-Scope Area: Non-MSA Maine						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	142	0.0	7.7	76.8	15.5	0.0
Population by Geography	502,247	0.0	5.9	79.1	14.9	0.0
Owner-Occupied Housing by Geography	160,410	0.0	5.4	79.8	14.8	0.0
Businesses by Geography	29,642	0.0	6.6	76.5	17.0	0.0
Farms by Geography	1,560	0.0	4.2	82.9	12.9	0.0
Family Distribution by Income Level	136,225	19.3	18.1	22.0	40.6	0.0
Household Distribution by Income Level	210,953	22.9	16.4	18.3	42.4	0.0
Median Family Income = \$51,782						
FFIEC Median Family Income for 2016 = \$55,300						Median Housing Value (Dec. 2016) = \$157,462
Households Below the Poverty Level = 9.3%						Unemployment Rate (Dec. 2016) = 3.5%

(*) The NA category consists of geographies that have not been assigned an income classification.
 Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The non-MSA Maine AA was selected for a full-scope review. The non-MSA Maine AA consists of Aroostook, Franklin, Hancock, Kennebec, Knox, Lincoln, Oxford, Somerset, and Waldo counties in Maine. The 2016 FFIEC adjusted median family income for this AA is approximately \$55.3 thousand, increasing from the 2010 level of approximately \$51.2 thousand. The 2017 poverty level in the AA is 9.3.

Banking competition is modest with 22 FDIC-insured depository institutions in the non-MSA Maine AA. TDBNA has 13 branches and 13 deposit-taking ATMs in the AA, with approximately \$900 million in deposits within this assessment area representing 26.0 percent of the bank’s adjusted total domestic retail deposits in the Maine rating area. As of June 30, 2017, TDBNA ranked fourth with a deposit market share of 9.6 percent. Major banking competitors include The Camden National Bank, First National Bank, and Bar Harbor Bank and Trust, with deposit market shares of 20.3 percent, 12.5 percent, and 10.9 percent, respectively.

The healthcare sector is a major employer in the area with Maine having the largest share of the nation’s baby boomers and highest median age of residents. The leisure and hospitality and retail sectors are also major employers. Some of the AA’s largest employers are Maine Health, LL Bean, Inc., Bath Iron Works, and Eastern Maine Medical Center.

The AA economy has improved following the recession that began in late 2008, with the unemployment rate at 3.5 percent as of December 2016, down slightly from 3.9 percent in December 2015. The median single-family housing value for the assessment area in 2016 is

approximately \$157.5 thousand; however, the rural nature of the AA and overall lack of available stock is a hindrance to home ownership.

TDBNA offers full-scale retail services, loans, and deposits in the AA and offers a range of banking services to businesses, including small businesses. During the evaluation period, 30.9 percent of TDBNA's HMDA loans and 22.7 percent of small business loans in the Maine rating area were made within the non-MSA Maine AA. There are opportunities for community development participation within the AA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent, especially for seniors and LMI families;
- Support for small businesses via improved access to financing;
- Financial education programs for small businesses and LMI individuals; and
- Financial support for local community development organizations.

Baltimore MD MSA

Demographic Information for Full-Scope Area: Baltimore MD MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	630	15.9	23.0	31.7	28.1	1.3
Population by Geography	2,495,557	11.5	22.1	33.8	32.1	0.6
Owner-Occupied Housing by Geography	627,994	6.2	18.1	37.2	38.5	0.0
Businesses by Geography	162,914	7.5	15.0	36.0	41.3	0.2
Farms by Geography	3,107	2.1	8.1	34.4	55.1	0.0
Family Distribution by Income Level	608,214	22.0	17.6	20.7	39.6	0.0
Household Distribution by Income Level	941,625	24.6	16.1	18.3	41.0	0.0
Median Family Income = \$81,788						
FFIEC Median Family Income for 2016 = \$86,700						Median Housing Value (Dec. 2016) = \$253,000
Households Below the Poverty Level = 6.8%						Unemployment Rate (Dec. 2016) = 4.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Baltimore MSA was selected for a full-scope review. The Baltimore MSA AA, is defined as a portion of the entire MSA and consists of Anne Arundel, Baltimore, Harford, and Howard counties and Baltimore City in Maryland. The 2016 FFIEC adjusted median family income for the MSA is approximately \$86.7 thousand, increasing from the 2010 level of approximately \$81.8 thousand. The 2017 poverty level in the MSA is 6.8 percent; however there are predominate areas of the AA with significant poverty. The city of Baltimore has experienced severe economic conditions with a poverty rate of 21.8 percent and a median family income of less than half that of the MSA. The city suffers from urban blight with over 16 thousand abandoned homes in need of rehabilitation or demolition.

Banking competition is strong with 56 FDIC-insured depository institutions in the Baltimore MSA. TDBNA has a minimal presence in the MSA with seven branches and 10 deposit-taking ATMs. TDBNA has approximately \$255.2 million in deposits within this assessment area representing 100.0 percent of the bank's adjusted total domestic retail deposits in the Maryland rating area. As of June 30, 2017, TDBNA ranked twenty-fifth with a deposit market share of 0.4 percent. Major banking competitors include Bank of America, N.A., Manufacturers and Trust Company, PNC Bank, N.A., and Wells Fargo Bank, N.A., with deposit market shares of 27.9 percent, 21.6 percent, 10.6 percent, and 9.9 percent, respectively.

Government and military are major employment sectors in the MSA along with healthcare and higher education. Some of the MSA's largest employers are Fort George G. Mead Army Base, John Hopkins University, the University of Maryland Medical System, and John Hopkins Health System.

The MSA economy has improved somewhat following the recession that began in late 2008 but lags the U.S. The unemployment rate was 4.0 percent as of December 2016, down from 4.8 percent in December 2015. The median single-family housing value for the assessment area in 2016 of approximately \$253 thousand combined with the lack of available housing stock makes home ownership difficult, especially for LMI families with annual income of approximately \$43.4 thousand or less.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, 1.0 percent of TDBNA's HMDA loans and 0.4 percent of small business loans were made within the Baltimore MSA. There are opportunities for community development participation within the MSA with community development and governmental organizations representing affordable housing, economic development, and services to low- and moderate-income families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent. There is a lack of available quality affordable housing stock in the area either for purchase or rent. Fifty-five percent of renters spend in excess of 30 percent of their income on rent.
- Flexible and affordable lending and deposit products for LMI individuals and the under- or unbanked;
- Increased access to ATMs and the ability to obtain lower denomination bills from the ATM machines; and
- Financial support for local community development organizations and CDFIs in the form of grants, capital, and investments, unsecured working lines of credit, and acquisition and construction loans for development.

Springfield MA MSA

Demographic Information for Full-Scope Area: Springfield MA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	139	15.8	18.7	34.5	29.5	1.4
Population by Geography	621,570	13.0	20.0	34.7	31.9	0.5
Owner-Occupied Housing by Geography	151,878	3.3	15.4	41.3	40.0	0.0
Businesses by Geography	35,316	14.0	17.2	34.3	34.3	0.2
Farms by Geography	1,063	2.0	7.5	39.2	51.2	0.1
Family Distribution by Income Level	149,160	23.6	16.1	19.1	41.2	0.0
Household Distribution by Income Level	236,337	27.3	14.1	16.3	42.3	0.0
Median Family Income = \$65,262						
FFIEC Median Family Income for 2016 = \$68,000						
Households Below the Poverty Level = 11.6%						
					Median Housing Value (Dec. 2016) = \$197,200	
					Unemployment Rate (Dec. 2016) = 3.4%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Springfield MSA was selected for a full-scope review. The Springfield MSA AA is defined to include Hampden, Hampshire, and Franklin counties in Massachusetts. The 2016 FFIEC adjusted median family income for the MSA is approximately \$68 thousand, increasing from the 2010 level of approximately \$65.3 thousand. The 2017 poverty level in the MSA is relatively high at 11.6 percent.

There are 20 FDIC-insured depository institutions in the Springfield MSA. TDBNA has a modest presence in the MSA with 19 branches and 37 deposit-taking ATMs. TDBNA has approximately \$1.7 billion in deposits within this assessment area representing 34.7 percent of the bank's adjusted total domestic retail deposits in the Massachusetts rating area. As of June 30, 2017, TDBNA ranked second with a deposit market share of 11.3 percent. Major banking competitors include Bank of America, N.A., PeoplesBank, and Westfield Bank, with deposit market shares of 13.6 percent, 11.0 percent, and 9.4 percent, respectively.

The MSA employment is dependent on the healthcare sector, which employs one in four laborers in the MSA. The insurance and higher education sectors are also major employers. Some of the MSA's largest employers are the University of Massachusetts, Baystate Health, Big Y Supermarkets, and the Westover Air Reserve Base.

The MSA unemployment rate is 3.4 percent as of December 2016, down over two percent from 5.5 percent in December 2015. The median single-family housing value for the assessment area in 2016 is approximately \$197.2 thousand.

TDBNA offers full-scale retail services, loans and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, TDBNA made 36.3 percent of their HMDA loans and 31.1 percent of their small business loans in the Massachusetts rating area within the Springfield MSA. There are opportunities for community development participation within the MSA with community development and governmental organizations representing affordable housing, economic development, and services to low- and moderate-income families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent;
- Access to flexible banking products to compete with expensive and predatory products in the market place as well as increased community outreach;
- Financial literacy programs including intensive one-on-one counseling; and
- Financial support for local community development organizations serving the needs of both LMI individuals and families and small business.

Worcester MA MSA

Demographic Information for Full-Scope Area: Worcester MA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	172	8.7	21.5	41.3	27.3	1.2
Population by Geography	798,552	7.3	17.5	42.1	32.7	0.4
Owner-Occupied Housing by Geography	201,656	2.2	12.9	47.2	37.7	0.0
Businesses by Geography	47,986	8.5	16.9	38.8	35.7	0.1
Farms by Geography	1,355	1.8	7.5	45.7	45.0	0.0
Family Distribution by Income Level	201,905	20.6	16.5	21.9	41.0	0.0
Household Distribution by Income Level	298,162	25.0	14.9	17.9	42.2	0.0
Median Family Income = \$77,128						
FFIEC Median Family Income for 2016 = \$78,500						
Households Below the Poverty Level = 6.9%						
					Median Housing Value (Dec. 2016) = \$239,400	
					Unemployment Rate (Dec. 2016) = 3.0%	

(*) The NA category consists of geographies that have not been assigned an income classification.
 Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Worcester MSA was selected for a full-scope review. The Worcester MSA AA is defined to include Worcester County, MA in its entirety. The 2016 FFIEC adjusted median family income for the MSA is approximately \$78.5 thousand, increasing slightly from the 2010 level of approximately \$77.1 thousand. The 2017 poverty level in the MSA is 6.9 percent.

There are 39 FDIC-insured depository institutions in the MSA. TDBNA has 14 branches and 25 deposit-taking ATMs in the MSA. TDBNA has approximately \$1.5 billion in deposits within this assessment area representing 30.6 percent of the bank’s adjusted total domestic retail deposits in the Massachusetts rating area. As of June 30, 2017, TDBNA ranked second with a deposit market share of 8.8 percent. Major banking competitors include Bank of America, N.A., Commerce Bank and Trust, and UniBank for Savings, with deposit market shares of 14.7 percent, 8.3 percent, and 8.3 percent, respectively.

The MSA’s primary employment sectors are manufacturing (especially semiconductor, paper, plastics, and pharmaceutical plants); healthcare and higher education. Some of the MSA’s largest employers are the UMass Memorial Health Care, the University of Massachusetts Medical School, Reliant Medical Group, and the Saint Vincent Hospital.

The MSA unemployment rate is 3.0 percent as of December 2016, down nearly two percent from 4.8 percent in December 2015. The median single-family housing value for the assessment area in 2016 is approximately \$239.4 thousand.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period,

TDBNA made 13.2 percent of their HMDA loans and 34.3 percent of their small business loans in the Massachusetts rating area within the Worcester MSA. There are opportunities for community development participation within the MSA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent especially for LMI families;
- Access to flexible banking products to compete with expensive and predatory products in the market place;
- Financial literacy programs including intensive one-on-one counseling; and
- Financial support for local community development organizations serving the needs of LMI individuals and families.

Manchester NH MSA

Demographic Information for Full-Scope Area: Manchester NH MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	86	9.3	22.1	48.8	18.6	1.2
Population by Geography	400,721	6.6	18.8	51.1	23.5	0.0
Owner-Occupied Housing by Geography	105,611	1.8	14.2	55.7	28.3	0.0
Businesses by Geography	27,495	11.7	14.3	49.0	24.6	0.4
Farms by Geography	754	2.8	9.9	57.4	29.8	0.0
Family Distribution by Income Level	104,907	18.9	18.8	23.6	36.7	0.0
Household Distribution by Income Level	153,120	22.7	16.8	19.8	40.7	0.0
Median Family Income = \$81,794						
FFIEC Median Family Income for 2016 = \$83,100						
Households Below the Poverty Level = 5.2%						
					Median Housing Value (Dec. 2016) = \$262,100	
					Unemployment Rate (Dec. 2016) = 2.4%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Manchester MSA was selected for a full-scope review. The Manchester MSA AA is defined to include Hillsborough County, NH in its entirety. The 2016 FFIEC adjusted median family income for this MSA is approximately \$83.1 thousand, increasing slightly from the 2010 level of approximately \$81.8 thousand. The 2017 poverty level in the MSA is 5.2 percent.

There are 21 FDIC-insured depository institutions in the MSA. TDBNA has 22 branches and 26 deposit-taking ATMs. TDBNA has approximately \$2.1 billion in deposits within this assessment area representing 47.3 percent of the bank's adjusted total domestic retail deposits in the New Hampshire rating area. As of June 30, 2017, TDBNA ranked third with a deposit market share of 19.9 percent. Major banking competitors include Citizens Bank, N.A. and Bank of America, N.A., with deposit market shares of 38.7 percent and 23.5 percent, respectively.

The MSA's primary employment sectors are manufacturing (with a concentration in computer and electronics); finance; and healthcare services. Some of the MSA's largest employers are the Fidelity Investments, Hannaford Bros. Co., Elliot Hospital, and BAE Systems Electronic Solutions.

The MSA unemployment rate is low at 2.4 percent as of December 2016, down slightly from 2.8 percent in December 2015. The median single-family housing value for the assessment area in 2016 is approximately \$262.1 thousand.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period,

TDBNA made 40.4 percent of their HMDA loans and 53.0 percent of their small business loans in the New Hampshire rating area within the Manchester MSA. There are opportunities for community development participation within the MSA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable rental housing;
- Flexible, affordable home improvement loans to rehabilitate aging housing stock;
- Access to flexible banking products and financial education for small businesses; and
- Financial support for local community development organizations serving the needs of LMI individuals and families.

Non-MSA New Hampshire

Demographic Information for Full-Scope Area: Non-MSA New Hampshire						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	107	0.0	13.1	66.4	20.6	0.0
Population by Geography	464,328	0.0	13.0	67.0	20.1	0.0
Owner-Occupied Housing by Geography	135,533	0.0	11.8	67.2	21.1	0.0
Businesses by Geography	33,594	0.0	13.1	66.6	20.3	0.0
Farms by Geography	1,353	0.0	9.5	68.1	22.5	0.0
Family Distribution by Income Level	121,972	17.6	18.6	23.3	40.5	0.0
Household Distribution by Income Level	184,471	21.5	16.8	19.4	42.3	0.0
Median Family Income = \$66,238						
FFIEC Median Family Income for 2016 = \$71,400						Median Housing Value (Dec. 2016) = \$232,214
Households Below the Poverty Level = 5.6%						Unemployment Rate (Dec. 2016) = 2.5%

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The non-MSA New Hampshire AA was selected for a full-scope review. The non-MSA New Hampshire AA consists of Belknap, Carroll, Cheshire, Grafton, Merrimack, and Sullivan counties in New Hampshire. The 2016 FFIEC adjusted median family income for the AA is approximately \$71.4 thousand, increasing from the 2010 level of approximately \$66.2 thousand. The 2017 poverty level in the AA is 5.6 percent.

There are 24 FDIC-insured depository institutions in the non-MSA New Hampshire AA. TDBNA has 19 branches and 25 deposit-taking ATMs in the AA, with approximately \$2.3 billion in deposits within this assessment area representing 52.7 percent of the bank's adjusted total domestic retail deposits in the New Hampshire rating area. As of June 30, 2017, TDBNA ranked first with a deposit market share of 20.5 percent. Major banking competitors include Citizens Bank, N.A., Bank of America, N.A., and Bank of New Hampshire, with deposit market shares of 11.7 percent, 9.4 percent, and 8.3 percent, respectively.

The healthcare sector is a major employer in the area. The area has grown three times faster than the rest of the northeast, with the influx of new residents highly concentrated in those 65 and older. An area healthcare facility that opened in 2016 is already at capacity and looking to expand. The leisure and hospitality and finance sectors are also major employers. Some of the AA's largest employers are Genesis Healthcare, Shaw's Supermarkets, Wentworth-Douglass Hospital, and Exeter Hospital.

The AA economy has improved following the recession that began in late 2008, with the unemployment rate at 2.5 percent as of December 2016, down slightly from 2.9 percent in December 2015. The median single-family housing value for the assessment area in 2016 is

approximately \$232.2 thousand; however, the rural nature of the AA and overall lack of available stock is a hindrance to home ownership.

TDBNA offers full-scale retail services, loans, and deposits in the AA and offers a range of banking services to businesses, including small businesses. During the evaluation period, 59.6 percent of TDBNA's HMDA loans and 47.0 percent of small business loans in the New Hampshire rating area were made within the non-MSA New Hampshire AA. There are opportunities for community development participation within the AA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable rental housing;
- Flexible, affordable home improvement loans for rehabilitation of aging housing stock;
- Access to flexible banking products, start-up loans, and financial education for small businesses; and
- Financial support for local community development organizations serving the needs of LMI individuals and families.

Atlantic City NJ MSA

Demographic Information for Full-Scope Area: Atlantic City NJ MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	69	10.1	18.8	46.4	23.2	1.4
Population by Geography	274,549	6.9	19.8	49.5	22.9	0.9
Owner-Occupied Housing by Geography	71,885	2.9	14.1	55.4	27.6	0.0
Businesses by Geography	15,489	8.7	13.8	50.3	7.1	0.1
Farms by Geography	504	0.8	7.7	59.7	31.7	0.0
Family Distribution by Income Level	67,256	21.3	17.8	20.5	40.4	0.0
Household Distribution by Income Level	101,645	23.9	16.5	17.6	42.0	0.0
Median Family Income = \$66,920						
FFIEC Median Family Income for 2016 = \$62,200						
Households Below the Poverty Level = 8.8%						
					Median Housing Value (Dec. 2016) = \$187,500	
					Unemployment Rate (Dec. 2016) = 7.2%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Atlantic City MSA was selected for a full-scope review. The Atlantic City MSA AA, is defined to include Atlantic County, NJ in its entirety. The 2016 FFIEC adjusted median family income for this MSA is approximately \$62.2 thousand, a decrease of over 7.0 percent from the 2010 level of approximately \$66.9 thousand. The 2017 poverty level in the MSA is 8.8 percent; however there are predominate areas of the AA with significant poverty. The city of Atlantic City has experienced severe economic conditions with a poverty rate of 36.6 percent and a median family income of less than half that of the MSA. During the period from 2013 to 2016 five of the city's 12 casinos, a prominent employment industry for the area, closed and left the city. Additionally, two-thirds of the city's tax revenues come from gambling revenues, further impacting beleaguered public sector funding.

There are 14 FDIC-insured depository institutions in the Atlantic City MSA. TDBNA has a moderate presence in the MSA with eight branches and 16 deposit-taking ATMs. TDBNA has approximately \$1.1 billion in deposits within this assessment area representing 36.0 percent of the bank's adjusted total domestic retail deposits in the New Jersey rating area. As of June 30, 2017, TDBNA ranked first with a deposit market share of 20.5 percent. Major banking competitors include OceanFirst Bank, Wells Fargo Bank, N.A., and Bank of America, N.A., with deposit market shares of 16.7 percent, 14.2 percent, and 13.8 percent, respectively.

Leisure and hospitality services remain the major employment sector in the MSA along with government and healthcare. Some of the MSA's largest employers are Borgata Hotel Casino & Spa, Hotel at Bally's Atlantic City, Trump Hotels & Casino Resorts, and the Federal Aviation Administration.

The MSA economy has improved somewhat following the recession that began in late 2008 but lags well behind the U.S and has experienced a back-slide. While the unemployment rate decreased from 9.6 in 2015 to 7.2 percent as of December 2016, the median single-family housing value for the assessment area in 2016 was approximately \$187.5 thousand, a decrease of approximately 9.0 percent in one year from \$206 thousand in 2015. Despite the decline in housing values, the large percentage of the population living below the poverty line and the overall quality of available housing stock, makes home ownership difficult with less than 30 percent of housing units in the city of Atlantic City, NJ, owner-occupied.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, 32.3 percent of TDBNA's HMDA loans and 37.8 percent of small business loans made in the New Jersey rating area, were made within the Atlantic City MSA. There are opportunities for community development participation within the MSA with community development and governmental organizations representing affordable housing, economic development, and services to low- and moderate-income families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent. There is a lack of available quality affordable housing stock in the area either for purchase or rent. There is a need for first-time homebuyer programs with down payment assistance and affordable home improvement loans to rehabilitate the aging housing stock;
- Access to microloans for both small businesses and LMI individuals;
- Financial literacy programs and general community outreach; and
- Financial support for local community development organizations and CDFIs in the form of capital grants and investments, unsecured working lines of credit, and acquisition and construction loans for the development of affordable housing.

Trenton NJ MSA

Demographic Information for Full-Scope Area: Trenton NJ MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	77	19.5	18.2	29.9	31.2	1.3
Population by Geography	366,513	13.6	16.0	31.9	38.0	0.5
Owner-Occupied Housing by Geography	87,700	6.9	14.1	36.7	42.3	0.0
Businesses by Geography	22,797	11.1	10.5	29.6	48.8	0.0
Farms by Geography	526	5.5	12.0	30.0	52.5	0.0
Family Distribution by Income Level	87,385	22.8	16.8	19.2	41.2	0.0
Household Distribution by Income Level	129,213	25.6	15.1	16.8	42.5	0.0
Median Family Income = \$88,694						
FFIEC Median Family Income for 2016 = \$93,000						
Households Below the Poverty Level = 7.4%						
					Median Housing Value (Dec. 2016) = \$253,100	
					Unemployment Rate (Dec. 2016) = 3.5%	

(*) The NA category consists of geographies that have not been assigned an income classification.
 Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Trenton MSA was selected for a full-scope review. The Trenton MSA AA, is defined to include Mercer County, NJ in its entirety. The 2016 FFIEC adjusted median family income for this MSA is approximately \$93.0 thousand, an increase from the 2010 level of approximately \$88.7 thousand. The 2017 poverty level in the MSA is 7.4 percent; however there are areas of the AA with significant poverty. The economic conditions in the City of Trenton are far worse than the overall MSA, with a poverty rate of 27.6 percent and a median family income of approximately \$34.4 thousand, a little more than one-third of the MSA.

There are 25 FDIC-insured depository institutions in the Trenton MSA. TDBNA has a moderate presence in the MSA with nine branches and 13 deposit-taking ATMs. TDBNA has approximately \$1.1 billion in deposits within this assessment area representing 36.7 percent of the bank’s adjusted total domestic retail deposits in the New Jersey rating area. As of June 30, 2017, TDBNA ranked fourth with a deposit market share of 7.3 percent. Major banking competitors include Bank of America, N.A., Wells Fargo Bank, N.A., and PNC Bank N.A., with deposit market shares of 23.1 percent, 15.5 percent, and 14.3 percent, respectively.

Trenton is the capital of the State of New Jersey and state and local government are the primary employers in the MSA. Finance, education, and healthcare services are also primary employment sectors in the MSA. In addition to the State of New Jersey, which employs approximately one in five workers in Trenton, other large employers in the MSA are Bank of America, Princeton University, Bristol-Myers Squibb, and Capital Health Systems.

The MSA economy has improved somewhat following the recession that began in late 2008. The unemployment rate was 3.5 percent as of December 2016. The median single-family

housing value for the assessment area in 2016 was approximately \$253.1 thousand, making home ownership difficult, especially for low-income families with annual income of approximately \$46.5 thousand or less.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, 24.0 percent of TDBNA's HMDA loans and 30.4 percent of small business loans made in the New Jersey rating area, were made within the Trenton MSA. There are opportunities for community development participation within the MSA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable starter housing for purchase and quality affordable rental housing;
- Affordable home improvement loans to rehabilitate aging housing stock;
- Access to low dollar lines of credit for small businesses;
- Support for local community development organizations that are focused on affordable housing development and the provision of basic needs to LMI persons.

Albany NY MSA

Demographic Information for Full-Scope Area: Albany NY MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	140	7.9	13.6	48.6	29.3	0.7
Population by Geography	595,884	7.0	11.1	48.8	32.8	0.3
Owner-Occupied Housing by Geography	158,062	2.4	8.4	53.1	36.1	0.0
Businesses by Geography	37,250	6.0	13.5	48.0	32.5	0.0
Farms by Geography	958	1.3	4.8	62.6	31.3	0.0
Family Distribution by Income Level	147,661	18.2	16.8	21.8	43.3	0.0
Household Distribution by Income Level	239,209	22.2	15.4	17.9	44.5	0.0
Median Family Income = \$74,739						
FFIEC Median Family Income for 2016 = \$82,000						
Households Below the Poverty Level = 5.5%						
					Median Housing Value (Dec. 2016) = \$203,700	
					Unemployment Rate (Dec. 2016) = 4.0%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Albany MSA was selected for a full-scope review. The Albany MSA AA is a portion of the entire MSA and is defined to include Albany County, Rensselaer County (limited to the Town of East Greenbush), Saratoga County, and Schenectady County (limited to the Town of Niskayuna). The 2016 FFIEC adjusted median family income for this MSA is approximately \$82.0 thousand, an increase of 9.8 percent from the 2010 level of approximately \$74.7 thousand. The 2017 poverty level in the MSA is 5.5 percent; however, there are areas of the AA with significant poverty. The City of Albany has a poverty rate of 28.7 percent, over five times that of the MSA.

Banking competition is modest with 23 FDIC-insured depository institutions in the Albany MSA. TDBNA has a modest presence in the MSA with seven branches and seven deposit-taking ATMs. TDBNA has approximately \$476 million in deposits within this assessment area representing 28.6 percent of the bank's adjusted total domestic retail deposits in the New York rating area. As of June 30, 2017, TDBNA ranked ninth with a deposit market share of 2.2 percent. Major banking competitors include Key Bank, N.A., Citizens Bank, N.A., Trustco Bank, and Bank of America, N.A., with deposit market shares of 45.3 percent, 11.4 percent, 9.1 percent, and 7.6 percent, respectively.

Albany is the capital of the State of New York and state and local government are the primary employers in the MSA. Healthcare services, finance, and education are also primary employment sectors in the MSA. In addition to the State of York, the MSA's other largest employers are St. Peter's Health Partners, Albany Medical Center, the Golub Corp, and GE. The unemployment rate was 4.0 percent as of December 2016, down from 4.5 percent in December 2015.

The MSA economy has improved somewhat following the recession that began in late 2008; however, housing prices have remained flat. The median single-family housing value for the assessment area in 2016 was approximately \$203.7 thousand. Despite the relatively flat housing market, homeownership remains difficult, especially for low-income families with income of \$41 thousand or less.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, 25.8 percent of TDBNA's HMDA loans and 34.9 percent of small business loans made in the New York rating area, were made within the Albany MSA. There are opportunities for community development participation within the MSA with community development and governmental organizations representing affordable housing, economic development, and services to low- and moderate-income families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent. There is a need for affordable home improvement loans to rehabilitate aging housing stock;
- Access to affordable microloans for small businesses and LMI individuals;
- Financial literacy programs for both small businesses and LMI individuals, general community outreach and access (including limited-purpose branches in grocery stores or medical facilities), and increased hours;
- Access to flexible lending products to serve as an alternative to predatory lending products in the market; and
- Financial support for local community development organizations.

Asheville NC MSA

Demographic Information for Full-Scope Area: Asheville NC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	99	3.0	14.1	60.6	20.2	2.0
Population by Geography	404,094	1.8	15.1	64.2	18.9	0.0
Owner-Occupied Housing by Geography	121,645	0.9	12.7	65.9	20.5	0.0
Businesses by Geography	32,692	4.6	16.0	54.8	24.6	0.0
Farms by Geography	1,066	1.1	14.8	66.2	17.8	0.0
Family Distribution by Income Level	109,348	19.4	18.7	21.5	40.4	0.0
Household Distribution by Income Level	170,863	22.7	17.1	18.4	41.8	0.0
Median Family Income = \$55,018						
FFIEC Median Family Income for 2016 = \$56,200						
Households Below the Poverty Level = 9.2%						
					Median Housing Value (Dec. 2016)	\$192,747
					Unemployment Rate (Dec. 2016)	= 4.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Asheville MSA was selected for a full-scope review. The Asheville MSA AA is a primarily rural area that is a portion of the entire MSA defined to counties of Buncombe, Haywood, and Henderson. The 2016 FFIEC adjusted median family income for this MSA is approximately \$56.2 thousand, a slight increase from the 2010 level of approximately \$55.0 thousand. The 2017 poverty level in the MSA is 9.2 percent; however there are counties within the AA with higher levels of poverty. Specifically, Haywood County has a poverty rate of 15.9 percent.

Banking competition is modest with 20 FDIC-insured depository institutions in the MSA. TDBNA has eight branches and eight deposit-taking ATMs in the MSA. TDBNA has approximately \$474 million in deposits within this assessment area representing 55.6 percent of the bank's adjusted total domestic retail deposits in the North Carolina rating area. As of June 30, 2017, TDBNA ranked eighth with a deposit market share of 5.7 percent. Major banking competitors include Wells Fargo Bank, N.A., First Citizens Bank & Trust Company, Bank of America, N.A., and SunTrust Bank with deposit market shares of 20.9 percent, 20.0 percent, 8.3 percent, and 8.0 percent, respectively.

Healthcare services, education, and leisure and hospitality services are the primary employment sectors in the MSA. The largest employers in the MSA are Mission Health Systems and Hospital, Ingles Markets, Inc., VA Medical Center, and The Biltmore Co. The unemployment rate was 4.0 percent as of December 2016, down from 4.5 percent in December 2015.

The MSA economy has improved following the recession that began in late 2008. The median single-family housing value for the assessment area in 2016 was approximately \$192.7

thousand, which, while well below the U.S. median housing value of \$327 thousand, remains out of reach for low-income families in the MSA, with income of \$28.1 thousand or less.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, 62.8 percent of TDBNA's HMDA loans and 48.5 percent of small business loans made in the North Carolina rating area, were made within the Asheville MSA AA. There are opportunities for community development participation within the MSA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing for purchase or rent and affordable mortgage products that include a down-payment assistance element;
- Access to affordable loans for small business start-up and expansion;
- Workforce development projects;
- Access to markets with healthy food choices is needed, due to the low-income and rural make-up, there are multiple food deserts in the AA. Based on data from the U.S. Census Bureau, there are four food deserts in Buncombe County, NC alone; and
- Financial support for local community development organizations.

Greenville SC MSA

Demographic Information for Full-Scope Area: Greenville SC MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	195	6.7	25.1	44.1	24.1	0.0
Population by Geography	824,112	4.6	20.8	47.1	27.5	0.0
Owner-Occupied Housing by Geography	218,943	2.7	17.7	50.8	28.8	0.0
Businesses by Geography	45,536	4.6	20.1	40.6	34.7	0.0
Farms by Geography	1,193	1.8	17.5	53.9	26.7	0.0
Family Distribution by Income Level	211,166	22.0	16.9	19.9	41.2	0.0
Household Distribution by Income Level	312,837	24.7	16.2	17.2	41.9	0.0
Median Family Income = \$54,957						
FFIEC Median Family Income for 2016 = \$58,600						Median Housing Value (Dec. 2016) = \$186,200
Households Below the Poverty Level = 11.2%						Unemployment Rate (Dec. 2016) = 3.6%

(*) The NA category consists of geographies that have not been assigned an income classification.
 Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Greenville MSA was selected for a full-scope review. The Greenville MSA AA is defined to include Anderson, Greenville, Laurens, and Pickens County. The 2016 FFIEC adjusted median family income for this MSA is approximately \$58.6 thousand, an increase from the 2010 level of approximately \$55.0 thousand. The 2017 poverty level in the MSA is 11.2 percent; with disparities between the counties in the MSA. Greenville County has a poverty rate of 10.9; however the remaining counties are more rural and experience higher poverty rates and lower median income, ranging from Pickens County with a poverty rate of 14.9 percent and median income of \$43.5 thousand to Anderson County with a poverty rate of 23.3 percent and a median income of only \$31.6 thousand.

There are 35 FDIC-insured depository institutions in the MSA. TDBNA has 19 branches and 20 deposit-taking ATMs in the MSA, with approximately \$1.5 billion in deposits within this assessment area representing 39.0 percent of the bank’s adjusted total domestic retail deposits in the South Carolina rating area. As of June 30, 2017, TDBNA ranked fourth with a deposit market share of 10.1 percent. Major banking competitors include Wells Fargo Bank, N.A., Bank of America, N.A., and Branch Banking and Trust Company with deposit market shares of 17.5 percent, 14.7 percent, and 10.9 percent, respectively.

Professional and business services is the leading employment sector in the MSA; however, many of these positions are via the temp-services industry which has doubled their presence since 2005. These positions are traditionally lower paying with less benefits and security than traditional full-time employment. Manufacturing, healthcare services and educations are also primary employment sectors in the MSA. The largest employers in the MSA are Greenville Health System, Bon Secours St. Francis Health System, Michelin North America, Inc., and

Clemson University. The unemployment rate was 3.6 percent as of December 2016, down from 5.2 percent in December 2015.

The median single-family housing value for the assessment area in 2016 was approximately \$186.2 thousand, which, while well below the U.S. median housing value of \$327 thousand, remains out of reach for low-income families in the MSA, with income of \$29.3 thousand or less.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period, 16.7 percent of TDBNA's HMDA loans and 30.0 percent of small business loans made in the South Carolina rating area, were made within the Greenville MSA AA. There are opportunities for community development participation within the MSA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing, especially rental housing;
- Access to affordable loans and working capital for small businesses;
- Financial literacy programs for small businesses and LMI individuals;
- Access to markets with healthy food choices is needed, due to the low income and rural make-up, there are multiple food deserts in the AA; and
- Financial and volunteer support for local community development organizations.

Burlington VT MSA

Demographic Information for Full-Scope Area: Burlington VT MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	47	2.1	21.3	55.3	19.1	2.1
Population by Geography	211,261	1.5	19.6	55.4	23.6	0.0
Owner-Occupied Housing by Geography	56,920	0.4	15.6	58.4	25.5	0.1
Businesses by Geography	17,436	1.1	20.0	53.1	25.6	0.2
Farms by Geography	802	0.6	20.3	54.5	24.6	0.0
Family Distribution by Income Level	51,907	18.3	19.0	23.5	39.2	0.0
Household Distribution by Income Level	83,140	23.1	16.2	19.7	40.9	0.0
Median Family Income = \$72,928						
FFIEC Median Family Income for 2016 = \$84,000						Median Housing Value (Dec. 2016) = \$266,000
Households Below the Poverty Level = 6.7%						Unemployment Rate (Dec. 2016) = 2.1%

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The Burlington MSA was selected for a full-scope review. The Burlington MSA AA is defined to include Chittenden, Franklin, and Grand Isle County. The 2016 FFIEC adjusted median family income for this MSA is approximately \$84.0 thousand, an increase from the 2010 level of approximately \$72.9 thousand. The 2017 poverty level in the MSA is 6.7 percent.

Banking competition is modest with 12 FDIC-insured depository institutions in the MSA. TDBNA has 13 branches and 24 deposit-taking ATMs in the MSA, with approximately \$1.2 billion in deposits within this assessment area representing 46.8 percent of the bank's adjusted total domestic retail deposits in the Vermont rating area. As of June 30, 2017, TDBNA ranked second with a deposit market share of 25.6 percent. Major banking competitors include People's United Bank, N.A., Community Bank, N.A., and KeyBank, N.A., with deposit market shares of 29.6 percent, 13.8 percent, and 13.5 percent, respectively.

Education and healthcare services lead the employment sectors in the MSA, with retail and manufacturing also primary employment sectors. The largest employers in the MSA are the University of Vermont Medical Center, the University of Vermont, GlobalFoundries, and Shaw's Supermarkets. The unemployment rate was low at 2.1 percent as of December 2016.

The median single-family housing value for the assessment area in 2016 was approximately \$266.0 thousand, which makes home ownership difficult, especially for low-income families in the MSA, with income of \$42.0 thousand or less.

TDBNA offers full-scale retail services, loans, and deposits in the MSA and offers a range of banking services to businesses, including small businesses. During the evaluation period,

39.2 percent of TDBNA's HMDA loans and 44.0 percent of small business loans made in the Vermont rating area, were made within the Burlington MSA AA. There are opportunities for community development participation within the MSA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Quality affordable housing, especially for seniors as the population in the AA is aging;
- Financial literacy programs for small businesses and LMI individuals; and
- Financial and volunteer support for local community development organizations.

Non-MSA Vermont

Demographic Information for Full-Scope Area: Non-MSA Vermont						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	114	10.9	17.5	56.7	14.9	0.0
Population by Geography	342,417	0.1	18.5	68.8	12.6	0.0
Owner-Occupied Housing by Geography	41,091	0.1	14.8	70.8	14.4	0.0
Businesses by Geography	28,490	0.2	18.5	64.7	16.6	0.0
Farms by Geography	1,564	0.0	13.9	71.3	14.8	0.0
Family Distribution by Income Level	91,590	19.5	18.9	22.6	39.0	0.0
Household Distribution by Income Level	144,583	24.4	16.2	18.8	40.6	0.0
Median Family Income = \$60,519						
FFIEC Median Family Income for 2016 = \$64,400						Median Housing Value (Dec. 2016) = \$206,375
Households Below the Poverty Level = 7.5%						Unemployment Rate (Dec. 2016) = 2.8%

(*) The NA category consists of geographies that have not been assigned an income classification.

Sources: 2010 U.S. Census, 2016 FFIEC updated MFI; National Assoc. of Realtors 2016 MHV; and BLS 2016 unemployment.

The non-MSA Vermont AA was selected for a full-scope review. The non-MSA Vermont AA is a primarily rural area defined to include Bennington, Caledonia, Lamoille, Orleans, Rutland, Washington, Windham, and Windsor County in Vermont. The 2016 FFIEC adjusted median family income for this AA is approximately \$64.4 thousand, increasing from the 2010 level of approximately \$60.5 thousand. The 2017 poverty level in the AA is 7.5 percent; however greater poverty exists in many of the counties in the AA, with the highest in Orleans County at 15.5 percent of households below the poverty line.

There are 19 FDIC-insured depository institutions in the non-MSA Vermont AA. TDBNA has 17 branches and 18 deposit-taking ATMs in the AA, with approximately \$1.3 billion in deposits within this assessment area representing 53.2 percent of the bank's adjusted total domestic retail deposits in the Vermont rating area. As of June 30, 2017, TDBNA ranked second with a deposit market share of 19.4 percent. Major banking competitors include People's United Bank, N.A., Community Bank, N.A., and Community National Bank, with deposit market shares of 19.9 percent, 7.1 percent, and 6.9 percent, respectively.

The healthcare sector is a major employer in the area, followed by leisure and hospitality services and manufacturing. Some of the AA's largest employers are University of Vermont Medical Center, the University of Vermont, GlobalFoundries, and Rutland Regional Medical Center.

As of December 2016 the unemployment rate was 2.8 percent. The median single-family housing value for the assessment area in 2016 is approximately \$206.4 thousand; however,

the rural nature of the AA and overall lack of available housing stock is a hindrance to home ownership.

TDBNA offers full-scale retail services, loans, and deposits in the AA and offers a range of banking services to businesses, including small businesses. During the evaluation period, 50.8 percent of TDBNA's HMDA loans and 56.0 percent of small business loans in the Vermont rating area were made within the non-MSA Vermont AA. There are opportunities for community development participation within the AA with community development and governmental organizations representing affordable housing, economic development, and services to LMI families. Through community contacts performed by the OCC and review of information obtained by bank management as part of their needs assessment in the AA during the evaluation period, primary financial needs for this AA identified include:

- Affordable mortgage programs including purchase mortgage products with down payment assistance and low-cost home improvement loans to rehabilitate and maintain the area's aging housing stock;
- Quality affordable housing, especially for seniors as the population in the AA is aging;
- Financial literacy programs for small businesses and LMI individuals; and
- Financial and volunteer support for local community development organizations.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) Purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30th of each year. **Tables without data are not included in this PE.**

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

Table 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - The percentage distribution of the number of small

loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: ALLENTOWN MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Allentown MMSA	100.00	218	35,065	292	9,207	0	0	12	6,792	522	51,064	100.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ALLENTOWN MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Allentown MMSA	5	21,101	94	10,528	99	31,629	100.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: ALLENTOWN MMSA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
MA/AA:	Deposits	Branches						Branch Openings/Closings				Population*					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Allentown MMSA	100.00	8	100.00	0.00	12.50	37.50	50.00	0	0	0	0	0	0	7.75	18.52	38.16	35.57

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table 15: Distribution of Deposit-taking ATM Delivery System

DISTRIBUTION OF ATM* DELIVERY SYSTEM				Geography: ALLENTOWN MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
MA/AA:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Allentown MMSA	100.00	10	100.00	0	20.00	40.00	40.00	7.75	18.52	38.16	35.57

* ATM in this table refers solely to deposit-taking ATMs.

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation.

** Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Agg	% of Owner-Occupied Housing Units	% Bank Loans	Agg	% of Owner-Occupied Housing Units	% Bank Loans	Agg	% of Owner-Occupied Housing Units	% Bank Loans	Agg	% of Owner-Occupied Housing Units	% Bank Loans	Agg
Allentown MMSA	218	35,065	100.0	21,753	3.9	4.1	3.1	12.6	21.6	11.9	44.7	31.2	41.9	38.8	43.1	43.1	0.0	0.0	0.0
Total	218	35,065	100.0	21,753	3.9	4.1	3.1	12.6	21.6	11.9	44.7	31.2	41.9	38.8	43.1	43.1	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg
Allentown MMSA	218	35,065	100.0	21,753	19.4	17.0	6.0	17.6	24.8	16.7	21.7	17.0	21.3	41.3	39.9	37.9	0.0	1.8	18.0
Total	218	35,065	100.0	21,753	19.4	17.0	6.0	17.6	24.8	16.7	21.7	17.0	21.3	41.3	39.9	37.9	0.0	1.8	18.0

*Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2014-16

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg
Allentown MMSA	292	9,207	100.0	14,833	6.7	6.5	4.9	16.0	7.9	14.9	39.8	33.2	38.8	37.5	52.4	41.4	0.0	0.0	0.0
Total	292	9,207	100.0	14,833	6.7	6.5	4.9	16.0	7.9	14.9	39.8	33.2	38.8	37.5	52.4	41.4	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Allentown MMSA	292	9,207	100.0	14,833	77.8	50.7	49.7	5.1	12.3	17.1	37.0
Total	292	9,207	100.0	14,833	77.8	50.7	49.7	5.1	12.3	17.1	37.0

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: BOSTON MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Boston MMSA	100.00	2,832	785,838	3,450	119,162	4	84	79	258,676	6,365	1,163,760	100.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: BOSTON MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Boston MMSA	61	102,701	406	154,748	467	257,449	100.00	1	1,451

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Geography: BOSTON MMSA			
														Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
MA/AA:	Deposits	Branches						Branch Openings/Closings				Population*					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Boston MMSA	100.00	105	100.00	5.71	19.05	43.81	31.43	9	11	0	0	0	- 2	9.45	19.85	40.49	29.93

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table 15: Distribution of Deposit-taking ATM Delivery System

DISTRIBUTION OF ATM* DELIVERY SYSTEM				Geography: BOSTON MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
MA/AA:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Boston MMSA	100.00	175	100.00	7.43	18.29	41.14	33.14	9.45	19.85	40.49	29.93

* ATM in this table refers solely to deposit-taking ATMs.

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation.

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

2014-16

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Agg	% of Owner-Occupied Housing Units	% Bank Loans	Agg	% of Owner-Occupied Housing Units	% Bank Loans	Agg	% of Owner-Occupied Housing Units	% Bank Loans	Agg	% of Owner-Occupied Housing Units	% Bank Loans	Agg
Boston MMSA	2,832	785,838	100.0	183,765	3.1	3.6	3.6	13.9	16.9	13.5	48.0	46.3	47.4	35.0	33.2	35.5	0.0	0.0	0.0
Total	2,832	785,838	100.0	183,765	3.1	3.6	3.6	13.9	16.9	13.5	48.0	46.3	47.4	35.0	33.2	35.5	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg
Boston MMSA	2,832	785,838	100.0	183,765	22.1	11.1	4.1	16.7	24.0	14.8	20.7	20.3	23.1	40.6	44.2	44.9	0.0	0.3	13.2
Total	2,832	785,838	100.0	183,765	22.1	11.1	4.1	16.7	24.0	14.8	20.7	20.3	23.1	40.6	44.2	44.9	0.0	0.3	13.2

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2014-16**

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% B	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg
Boston MMSA	3,450	119,162	100.0	116,612	6.0	3.3	5.3	13.3	13.4	13.3	41.4	49.9	43.0	39.1	33.2	38.2	0.2	0.1	0.2
Total	3,450	119,162	100.0	116,612	6.0	3.3	5.3	13.3	13.4	13.3	41.4	49.9	43.0	39.1	33.2	38.2	0.2	0.1	0.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Boston MMSA	3,450	119,162	100.0	116,612	76.8	52.2	44.6	6.4	11.7	16.8	36.0
Total	3,450	119,162	100.0	116,612	76.8	52.2	44.6	6.4	11.7	16.8	36.0

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table 1. Lending Volume

LENDING VOLUME		Geography: NEW YORK MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
New York MMSA	100.00	10,371	3,594,349	25,861	700,480	6	399	448	1,718,257	36,686	6,013,485	100.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: NEW YORK MMSA								Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
New York MMSA	109	100.00	19.10	26.61	28.59	36.70	21.25	18.35	31.07	18.35	1.44	2.91	1.33	0.48	1.33

* Based on 2016 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW YORK MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
New York MMSA	91	411,388	1,767	823,700	1,858	1,235,088	100.00	2	6,005

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD Bank NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: NEW YORK MMSA Evaluation Period: JANUARY 1, 2017 TO DECEMBER 31, 2017							
MA/AA:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
New York MMSA	100.00	409	100.00	4.16	13.69	30.07	52.08	55	31	3	8	4	9	12.73	21.91	30.52	34.59

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table 15: Distribution of Deposit-taking ATM Delivery System

DISTRIBUTION OF ATM* DELIVERY SYSTEMS				Geography: New York MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
MA/AA:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
New York MMSA	100.00	817	100.00	7.99	16.65	26.81	47.86	12.73	21.91	30.52	34.59

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg
New York MMSA	10,371	3,594,349	100.0	355,921	2.3	2.4	2.6	13.1	13.8	12.1	35.9	28.5	32.9	48.7	55.3	52.5	0.0	0.0	0.0
Total	10,371	3,594,349	100.0	355,921	2.3	2.4	2.6	13.1	13.8	12.1	35.9	28.5	32.9	48.7	55.3	52.5	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg
New York MMSA	10,371	3,594,349	100.0	355,921	23.6	4.1	2.5	16.1	15.0	10.6	18.2	17.4	19.4	42.0	62.3	52.4	0.0	1.2	15.0
Total	10,371	3,594,349	100.0	355,921	23.6	4.1	2.5	16.1	15.0	10.6	18.2	17.4	19.4	42.0	62.3	52.4	0.0	1.2	15.0

*Source: 2010 U.S Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2014-16**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg
New York MMSA	25,861	700,481	100.0	632,731	6.6	4.4	6.7	16.7	14.9	16.5	29.6	31.6	28.8	45.9	48.5	46.9	1.2	0.6	1.1
Total	25,861	700,481	100.0	632,731	6.6	4.4	6.7	16.7	14.9	16.5	29.6	31.6	28.8	45.9	48.5	46.9	1.2	0.6	1.1

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
New York MMSA	25,861	700,481	100.0	632,731	78.7	49.6	42.4	6.3	9.3	15.1	41.1
Total	25,861	700,481	100.0	632,731	78.7	49.6	42.4	6.3	9.3	15.1	41.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: PHILADELPHIA MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Philadelphia MMSA	100.00	4,983	925,203	7,597	267,261	9	152	127	936,332	12,716	2,128,968	100.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: PHILADELPHIA MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia MMSA	53	100.00	6.82	11.32	25.66	15.09	36.13	30.19	31.39	43.40	3.24	3.45	0.97	4.19	4.50

* Based on 2016 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: PHILADELPHIA MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Philadelphia MMSA	42	176,883	817	341,173	859	518,056	100.00	2	5,801

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD BANK NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: PHILADELPHIA MMSA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch s	% of Rated Area Branch s in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Philadelphia MMSA	100.00	142	100.00	3.52	12.68	38.73	45.07	3	8	1	0	- 6	0	6.74	22.68	38.81	31.44

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System		Geography: Philadelphia MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017					
MA/Assessment Area:	Deposits	Deposit-taking ATMs				Population					
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Philadelphia MMSA	100.00	259	100.00	6.95	19.31	34.36	38.61	6.74	22.68	38.81	31.44

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg
Philadelphia MMSA	4,983	925,203	100.0	178,535	3.6	2.4	1.9	18.6	17.9	15.8	42.7	40.0	43.1	35.1	39.6	39.2	0.0	0.1	0.0
Total	4,983	925,203	100.0	178,535	3.6	2.4	1.9	18.6	17.9	15.8	42.7	40.0	43.1	35.1	39.6	39.2	0.0	0.1	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg
Philadelphia MMSA	4,983	925,203	100.0	178,535	21.1	10.9	6.4	17.5	22.5	16.0	21.0	19.9	20.3	40.4	44.2	37.5	0.0	2.5	19.8
Total	4,983	925,203	100.0	178,535	21.1	10.9	6.4	17.5	22.5	16.0	21.0	19.9	20.3	40.4	44.2	37.5	0.0	2.5	19.8

*Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2014-16**

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg
Philadelphia MMSA	7,597	267,261	100.0	128,654	4.0	2.3	3.0	17.2	14.3	15.7	38.2	41.8	38.7	40.1	41.4	42.2	0.5	0.3	0.4
Total	7,597	267,261	100.0	128,654	4.0	2.3	3.0	17.2	14.3	15.7	38.2	41.8	38.7	40.1	41.4	42.2	0.5	0.3	0.4

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Philadelphia MMSA	7,597	267,261	100.0	128,654	78.3	52.0	45.0	5.5	10.5	16.3	37.5
Total	7,597	267,261	100.0	128,654	78.3	52.0	45.0	5.5	10.5	16.3	37.5

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: PROVIDENCE MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Providence MMSA	100.00	257	51,227	310	10,347	0	0	5	27,600	572	89,174	100.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: PROVIDENCE MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Providence MMSA	8	13,930	81	13,832	89	27,762	100.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: PROVIDENCE MMSA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Providence MMSA	100.00	9	100.00	0.00	22.22	44.44	33.33	0	0	0	0	0	0	13.18	17.24	37.24	31.89

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System				Geography: Providence MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
MA/Assessment Area:	Deposits	Deposit-taking ATMs				Population					
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Providence MMSA	100.00	17	100.00	0	29.41	47.06	23.53	13.18	17.24	37.24	31.89

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg
Providence MMSA	257	51,227	100.0	29,513	3.7	5.8	3.6	14.3	19.5	13.0	43.1	39.7	41.7	38.9	35.0	41.7	0.0	0.0	0.0
Total	257	51,227	100.0	29,513	3.7	5.8	3.6	14.3	19.5	13.0	43.1	39.7	41.7	38.9	35.0	41.7	0.0	0.0	0.0

*Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg
Providence MMSA	257	51,227	100.0	29,513	22.9	12.1	4.8	17.3	26.5	17.1	19.8	19.1	22.6	40.0	40.9	38.1	0.0	1.6	17.4
Total	257	51,227	100.0	29,513	22.9	12.1	4.8	17.3	26.5	17.1	19.8	19.1	22.6	40.0	40.9	38.1	0.0	1.6	17.4

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2014-16**

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg
Providence MMSA	310	10,347	100.0	18,200	7.5	3.2	6.8	20.0	11.9	18.7	37.5	37.4	37.5	34.9	47.1	36.9	0.1	1.0	0.1
Total	310	10,347	100.0	18,200	7.5	3.2	6.8	20.0	11.9	18.7	37.5	37.4	37.5	34.9	47.1	36.9	0.1	1.0	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Providence MMSA	310	10,347	100.0	18,200	76.7	60.3	44.2	6.5	6.5	16.8	33.2
Total	310	10,347	100.0	18,200	76.7	60.3	44.2	6.5	6.5	16.8	33.2

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: WASHINGTON MMSA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Washington MMSA	100.00	1,931	921,628	1,501	46,700	0	0	31	75,172	3,463	1,043,500	100.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: WASHINGTON MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Washington MMSA	9	14,453	258	78,247	267	92,700	100.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD BANK NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: WASHINGTON MMSA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Washington MMSA	100.00	50	100.00	8.00	22.00	30.00	40.00	11	2	0	0	6	3	9.81	20.61	31.61	37.38

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System		Geography: Washington MMSA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017					
MA/Assessment Area:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Washington MMSA	100.00	74	100.00	6.76	22.97	28.38	41.89	9.81	20.61	31.61	37.38

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg
Washington MMSA	1,931	921,628	100.0	220,807	4.1	5.6	4.3	18.4	20.7	17.6	35.4	20.2	32.9	42.1	53.4	45.3	0.0	0.0	0.0
Total	1,931	921,628	100.0	220,807	4.1	5.6	4.3	18.4	20.7	17.6	35.4	20.2	32.9	42.1	53.4	45.3	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg
Washington MMSA	1,931	921,628	100.0	220,807	20.9	13.2	6.1	16.8	17.5	15.1	20.4	12.2	20.1	41.9	56.7	36.8	0.0	0.5	21.9
Total	1,931	921,628	100.0	220,807	20.9	13.2	6.1	16.8	17.5	15.1	20.4	12.2	20.1	41.9	56.7	36.8	0.0	0.5	21.9

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2014-16**

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg
Washington MMSA	1,501	46,700	100.0	133,649	4.5	5.4	3.9	18.4	20.3	17.9	31.8	30.4	31.6	44.8	43.8	46.4	0.5	0.2	0.1
Total	1,501	46,700	100.0	133,649	4.5	5.4	3.9	18.4	20.3	17.9	31.8	30.4	31.6	44.8	43.8	46.4	0.5	0.2	0.1

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Washington MMSA	1,501	46,700	100.0	133,649	77.8	51.2	49.8	5.6	11.6	16.6	37.2
Total	1,501	46,700	100.0	133,649	77.8	51.2	49.8	5.6	11.6	16.6	37.2

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: CONNECTICUT						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Hartford MSA	37.21	689	103,549	847	39,518	0	0	38	68,700	1,574	211,767	42.65
New Haven MSA	26.73	414	55,610	711	20,906	1	3	7	14,237	1,133	90,756	25.38
Limited Review:												
Bridgeport MSA	30.16	555	308,330	725	22,378	0	0	5	23,004	1,285	353,712	28.11
Norwich MSA	0.75	11	1,488	21	279	0	0	0	0	32	1,767	0.84
Non-MSA Connecticut	5.14	117	18,946	96	2,812	0	0	5	1,208	218	22,966	3.02
Statewide Connecticut	0.00	0	0	0	0	0	0	1	50,000	1	50,000	0.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: CONNECTICUT				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Hartford MSA	10	30,126	121	43,740	131	73,866	40.47	0	0
New Haven MSA	14	43,708	75	24,867	89	68,575	37.57	0	0
Limited Review:									
Bridgeport MSA	5	5,335	107	28,904	112	34,239	18.76	0	0
Norwich MSA	0	0	9	546	9	546	0.30	0	0
Non-MSA Connecticut	0	0	18	3,095	18	3,095	1.70	0	0
Statewide CT	2	1,250	2	951	4	2,201	1.21	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD BANK NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: CONNECTICUT Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Hartford MSA	42.65	24	35.82	8.33	12.50	41.67	37.50	0	5	0	- 1	- 3	- 1	12.55	14.09	37.74	34.30
New Haven MSA	25.38	22	32.84	9.09	13.64	54.55	22.73	0	3	0	- 1	- 2	0	13.09	22.04	29.43	35.12
Limited Review:																	
Bridgeport MSA	28.11	16	23.88	6.25	18.75	37.50	37.50	0	1	0	0	0	- 1	12.58	20.57	29.89	36.84
Norwich MSA	0.84	1	1.49	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	13.50	86.50
Non-MSA Connecticut	3.02	4	5.97	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.72	19.82	58.53	20.92

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System				Geography: Connecticut				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
MA/Assessment Area:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Hartford MSA	42.65	32	38.55	6.25	9.37	50.00	34.38	12.55	14.09	37.74	34.30
New Haven MSA	25.38	27	32.53	7.41	14.81	59.26	18.52	13.09	22.04	29.43	35.12
Limited Review:											
Bridgeport MSA	28.11	18	21.69	5.56	27.78	33.33	33.33	12.58	20.57	29.89	36.84
Norwich MSA	0.84	1	1.20	0.00	0.00	100.00	0.00	0.00	0.00	13.50	86.50
Non-MSA Connecticut	3.02	5	6.03	0.00	40.00	60.00	0.00	0.72	19.82	58.53	20.92

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Agg	% of Owner Occup Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg
Full Review:																			
Hartford MSA	689	103,549	38.6	32,360	3.6	3.9	2.9	11.1	14.5	9.5	46.7	48.0	46.1	38.6	33.5	41.5	0.0	0.0	0.0
New Haven MSA	414	55,610	23.2	18,988	3.5	4.1	2.7	16.6	17.9	12.7	40.5	40.1	40.6	39.4	37.9	44.0	0.0	0.0	0.0
Limited Review:																			
Bridgeport MSA	555	308,330	31.1	25,377	5.2	4.9	3.5	15.9	13.7	13.2	40.3	26.1	39.2	38.6	55.3	44.1	0.0	0.0	0.0
Norwich-MSA	11	1,488	0.6	734	0.0	0.0	0.0	0.0	0.0	0.0	45.8	45.5	39.8	54.2	54.5	60.2	0.0	0.0	0.0
Non-MSA Connecticut	117	18,946	6.6	4,935	0.5	0.0	0.2	14.7	23.9	12.4	58.2	41.0	58.1	26.6	35.0	29.3	0.0	0.0	0.0
Total	1,786	487,923	100.0	82,394	3.7	4.0	2.8	14.0	15.6	11.5	44.2	38.9	43.4	38.1	41.5	42.3	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	
Full Review:																				
Hartford MSA	689	103,549	38.6	32,360	21.4	13.2	6.6	17.0	32.4	19.1	22.1	21.6	22.5	39.6	31.2	34.3	0.0	1.6	17.5	
New Haven MSA	414	55,610	24.5	18,988	22.9	12.1	5.7	16.7	22.9	18.0	19.8	24.6	23.3	40.6	38.6	35.4	0.0	2.4	17.7	
Limited Review:																				
Bridgeport MSA	555	308,330	33.8	25,377	22.7	9.2	6.1	16.7	17.5	14.9	20.0	10.8	18.5	40.7	62.2	49.3	0.0	1.0	11.2	
Norwich MSA	9	1,311	0.8	734	11.9	0.0	3.4	15.5	50.0	12.8	22.8	55.6	28.6	49.9	25.0	39.4	0.0	0.0	15.8	
Non-MSA Connecticut	117	18,946	6.6	4,935	17.9	17.1	9.9	19.0	41.0	21.3	24.9	22.2	22.3	38.2	18.8	30.6	0.0	3.4	16.0	
Total	1,786	487,923	100.0	82,394	21.9	11.9	6.4	16.9	26.1	17.6	21.1	19.1	21.5	40.2	41.7	39.0	0.0	1.2	15.5	

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2014-16**

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	
Full Review:																				
Hartford MSA	847	39,518	35.3	26,757	9.2	12.4	7.5	11.0	9.6	11.1	42.0	43.3	44.5	37.4	34.7	36.8	0.4	0.0	0.2	
New Haven MSA	711	20,906	29.6	22,319	8.5	6.6	6.2	15.3	16.6	14.4	38.9	43.9	37.7	37.3	32.9	41.7	0.0	0.0	0.0	
Limited Review:																				
Bridgeport MSA	725	22,378	30.2	31,937	10.4	11.2	8.8	16.3	17.2	15.8	32.7	33.0	34.4	40.6	38.6	41.0	0.0	0.0	0.0	
Norwich MSA	21	279	0.9	380	0.0	0.0	0.0	0.0	0.0	0.0	57.1	61.9	53.4	42.9	38.1	46.6	0.0	0.0	0.0	
Non-MSA Connecticut	96	2,812	4.0	6,036	1.2	0.0	1.0	14.5	18.8	11.1	59.5	57.3	60.6	24.8	24.0	27.4	0.0	0.0	0.0	
Total	2,400	85,892	100.0	87,429	8.9	9.7	7.2	14.1	14.3	13.6	39.1	41.1	40.2	37.8	35.0	39.0	0.1	0.0	0.1	

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full Review:											
Hartford MSA	847	39,518	35.3	26,757	78.6	54.8	47.9	5.4	11.7	16.0	33.5
New Haven MSA	711	20,906	29.6	22,319	79.3	56.1	47.2	5.2	13.4	15.5	30.5
Limited Review:											
Bridgeport MSA	725	22,378	30.2	31,937	80.5	54.2	48.3	5.2	9.8	14.3	36.0
Norwich MSA	21	279	0.9	380	85.7	57.1	52.4	2.6	28.6	11.7	33.3
Non-MSA Connecticut	96	2,812	4.4	6,036	82.6	53.1	52.6	4.3	9.4	13.1	37.5
Total	2,400	85,892	100.0	87,429	79.7	55.0	48.2	5.2	11.5	15.1	33.5

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: DELAWARE						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Dover MSA	56.88	63	8,283	54	2,259	0	0	8	19,458	125	30,000	70.91
Limited Review:												
Salisbury MSA	43.12	75	37,415	19	722	0	0	1	1,814	95	39,951	29.09

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: DELAWARE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Dover MSA	1	34	23	1,477	24	1,511	46.15	0	0
Limited Review:									
Salisbury MSA	0	0	14	1,347	14	1,347	41.14	0	0
Statewide Delaware	0	0	1	416	1	416	12.71	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD BANK NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																Geography: DELAWARE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population									
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography*									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
Full Review:																							
Dover MSA	70.91	2	66.67	0.00	0.00	50.00	50.00	0	0	0	0	0	0	1.33	15.34	68.98	14.36						
Limited Review:																							
Salisbury MSA	29.09	1	33.33	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	72.97	27.03						

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System		Geography: Delaware				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017					
MA/Assessment Area:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Dover MSA	70.91	2	50.00	0.00	0.00	50.00	50.00	1.33	15.34	68.98	14.36
Limited Review:											
Salisbury MSA	29.09	2	50.00	0.00	0.00	100.00	0.00	0.00	0.00	72.97	27.03

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	
Full Review:																				
Dover MSA	63	8,283	45.7	6,154	0.0	0.0	0.0	9.2	14.3	7.2	75.3	68.3	78.3	15.5	17.5	14.5	0.0	0.0	0.0	
Limited Review:																				
Salisbury MSA	75	37,415	54.3	3,665	0.0	0.0	0.0	0.0	0.0	0.0	61.0	49.3	60.5	39.0	50.7	39.5	0.0	0.0	0.0	
Total	138	45,698	100.0	9,819	0.0	0.0	0.0	6.7	6.5	4.5	71.4	58.0	71.7	21.9	35.5	23.9	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	
Full Review:																				
Dover MSA	63	8,283	45.7	6,154	18.7	14.3	4.2	18.4	49.2	16.5	23.3	17.5	22.1	39.6	17.5	27.2	0.0	3.7	30.1	
Limited Review:																				
Salisbury MSA	75	37,415	58.5	3,665	18.2	2.6	2.3	15.7	5.7	6.8	21.2	10.7	13.2	44.9	84.0	66.1	0.0	0.0	11.5	
Total	138	45,698	100.0	9,819	18.6	7.2	3.5	17.8	24.6	12.9	22.8	13.8	18.7	40.7	53.6	41.7	0.0	1.5	23.1	

*Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2014-16**

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	
Full Review:																				
Dover MSA	54	2,259	74.0	2,689	0.0	0.0	0.0	20.2	31.4	19.5	65.0	59.3	65.3	14.8	20.4	15.2	0.0	0.0	0.0	
Limited Review:																				
Salisbury MSA	19	722	26.0	1,743	0.0	0.0	0.0	0.0	0.0	0.0	56.3	42.1	49.6	43.7	57.9	50.4	0.0	0.0	0.0	
Total	73	2,981	100.0	4,432	0.0	0.0	0.0	13.6	22.9	11.8	62.2	54.8	59.1	24.2	30.1	29.0	0.0	0.0	0.0	

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full Review:											
Dover MSA	54	2,259	74.0	2,689	76.9	55.6	46.2	3.7	17.6	19.4	33.3
Limited Review:											
Salisbury MSA	19	722	34.8	1,743	79.0	36.8	50.3	3.4	14.3	17.6	52.6
Total	73	2,981	100.0	4,432	77.6	50.7	47.8	3.6	16.7	18.8	38.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Miami MSA	45.17	2,135	747,974	3,272	135,124	1	45	32	100,908	5,440	984,051	53.97
Tampa MSA	7.59	418	88,080	481	27,540	0	0	14	49,645	913	165,265	7.89
Limited Review:												
Deltona MSA	6.02	339	46,387	380	15,215	0	0	6	4,400	725	66,002	4.56
Gainesville MSA	3.17	302	68,637	77	10,502	0	0	2	1,630	381	80,769	1.62
Homosassa Springs MSA	0.73	60	7,232	28	781	0	0	0	0	88	8,013	0.82
Jacksonville MSA	3.35	208	43,683	188	17,918	1	25	8	20,835	403	82,461	4.84
Lakeland MSA	2.25	159	21,925	110	5,389	0	0	2	1,119	271	28,433	1.41
Naples MSA	1.06	102	37,239	24	1,980	0	0	3	5,493	129	44,712	0.17
Ocala MSA	1.77	151	22,681	61	4,008	0	0	0	0	212	26,689	0.70
Orlando MSA	10.35	854	237,193	382	23,929	1	100	11	26,177	1,244	287,399	5.15
Palm Bay MSA	7.09	351	38,166	495	17,837	2	295	8	1,228	856	57,526	5.73
Port St Lucie MSA	6.25	442	81,575	304	17,696	2	553	7	24,906	752	124,730	6.25
Sebastian MSA	2.25	170	36,394	97	3,745	1	50	4	2,823	272	43,012	1.84
Sebring MSA	0.40	25	2,576	22	1,350	0	0	1	300	48	4,226	0.71
Non-MSA Florida	2.56	147	12,153	156	8,304	6	278	0	0	309	20,735	4.33

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank_NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: FLORIDA									
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Miami MSA	14	50,694	377	111,285	391	161,979	59.94	1	5,278
Tampa MSA	4	12,674	91	18,169	95	30,843	11.41	0	0
Limited Review:									
Deltona MSA	3	4,529	40	3,874	43	8,403	3.11	0	0
Gainesville MSA	1	1,480	47	3,305	48	4,785	1.77	0	0
Homosassa Springs MSA	0	0	12	789	12	789	0.29	0	0
Jacksonville MSA	2	8,177	133	9,393	135	17,570	6.50	0	0
Lakeland MSA	2	2,786	32	2,516	34	5,302	1.96	0	0
Naples MSA	0	0	11	2,462	11	2,462	0.91	0	0
Ocala MSA	0	0	24	1,119	24	1,119	0.41	0	0
Orlando MSA	1	872	93	8,862	94	9,734	3.60	0	0
Palm Bay MSA	0	0	32	9,735	32	9,735	3.60	0	0
Port St Lucie MSA	0	0	56	9,258	56	9,258	3.43	0	0
Sebastian MSA	0	0	29	2,392	29	2,392	0.89	0	0
Sebring MSA	1	3,263	10	584	11	3,847	1.42	0	0
Non-MSA Florida	1	276	34	1,308	35	1,584	0.59	0	0
Statewide Florida	1	10	1	434	2	444	0.16	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD BANK NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: FLORIDA																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Miami MSA	53.97	73	48.03	5.48	21.92	30.14	42.47	11	5	1	2	4	- 1	5.79	28.91	31.47	33.40
Tampa MSA	7.89	15	9.87	6.67	20.00	33.33	40.00	2	4	0	- 1	1	- 2	4.83	23.09	36.88	34.81
Limited Review:																	
Deltona MSA	4.56	8	5.26	0.00	75.00	25.00	0.00	0	3	0	0	- 2	- 1	2.31	18.88	57.54	21.27
Gainesville MSA	1.62	2	1.32	0.00	0.00	50.00	50.00	0	0	0	0	0	0	11.61	26.90	26.75	32.04
Homosassa Springs MSA	0.82	1	0.66	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	21.91	59.83	18.26
Jacksonville MSA	4.84	7	4.61	0.00	14.29	42.86	42.86	0	0	0	0	0	0	6.38	25.06	36.69	31.87
Lakeland MSA	1.41	4	2.63	25.00	0.00	0.00	75.00	0	2	0	- 1	- 1	0	2.50	22.40	55.56	19.53
Naples MSA	0.71	2	1.32	0.00	0.00	50.00	50.00	2	0	0	1	1	0	1.45	28.27	45.97	24.32
Ocala MSA	0.70	1	0.66	0.00	0.00	0.00	100.00	0	0	0	0	0	0	2.27	18.47	63.58	15.68
Orlando MSA	5.15	12	7.89	16.67	33.33	16.67	33.33	1	2	0	0	0	- 1	2.49	28.19	36.92	32.37
Palm Bay MSA	5.73	9	5.92	0.00	33.33	55.56	11.11	0	3	0	0	- 2	- 1	3.45	23.47	43.21	29.86
Port St Lucie MSA	6.25	7	4.61	14.29	42.86	28.57	14.29	0	3	0	0	- 2	- 1	3.61	19.67	51.77	24.95
Sebastian MSA	1.84	3	1.97	33.33	0.00	66.67	0.00	0	0	0	0	0	0	2.66	19.26	53.41	24.66
Sebring MSA	0.71	1	0.66	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	9.02	75.55	15.41
Non-MSA Florida	4.33	7	4.61	14.29	14.29	71.43	0.00	0	2	0	0	- 2	0	1.91	12.33	71.06	14.70

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System				Geography: Florida				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
MA/Assessment Area:	Deposits % of Total Bank Deposits	Deposit-taking ATMs						Population			
		#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Miami MSA	53.97	121	55.76	5.79	23.14	31.40	37.19	5.79	28.91	31.47	33.40
Tampa MSA	7.89	21	9.68	9.52	28.57	28.57	33.34	4.83	23.09	36.88	34.81
Limited Review:											
Deltona MSA	4.56	8	3.69	0.00	75.00	25.00	0.00	2.31	18.88	57.54	21.27
Gainesville MSA	1.62	2	0.92	0.00	0.00	50.00	50.00	11.61	26.90	26.75	32.04
Homosassa MSA	0.82	1	0.46	0.00	0.00	0.00	100.00	0.00	21.91	59.83	18.26
Jacksonville MSA	4.84	7	3.23	0.00	14.28	42.86	42.86	6.38	25.06	36.69	31.87
Lakeland MSA	1.41	4	1.84	25.00	0.00	0.00	75.00	2.50	22.40	55.56	19.53
Naples MSA	0.71	4	1.84	0.00	0.00	50.00	50.00	1.45	28.27	45.97	24.32
Ocala MSA	0.70	1	0.46	0.00	0.00	0.00	100.00	2.27	18.47	63.58	15.68
Orlando MSA	5.15	13	5.99	23.08	23.08	15.38	38.46	2.49	28.19	36.92	32.37
Palm Bay MSA	5.73	13	5.99	0.00	23.08	69.23	7.69	3.45	23.47	43.21	29.86
Port St Lucie MSA	6.25	10	4.61	20.00	50.00	20.00	10.00	3.61	19.67	51.77	24.95
Sebastian MSA	1.84	4	1.84	25.00	0.00	75.00	0.00	2.66	19.26	53.41	24.66
Sebring MSA	0.71	1	0.46	0.00	0.00	100.00	0.00	0.00	9.02	75.55	15.41
Non-MSA Florida	4.33	7	3.23	14.29	14.29	71.42	0.00	1.91	12.33	71.06	14.70

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	
Full Review:																				
Miami MSA	2,135	747,974	36.4	144,769	2.1	1.6	1.2	23.1	20.3	16.7	36.3	27.4	36.9	38.5	50.7	45.1	0.0	0.0	0.1	
Tampa MSA	418	88,080	7.1	96,087	1.9	1.4	1.3	21.4	24.2	14.7	42.1	28.7	41.2	34.6	45.7	42.8	0.0	0.0	0.0	
Limited Review:																				
Deltona MSA	339	46,387	5.8	17,817	1.3	0.3	0.4	14.9	13.6	11.2	54.7	66.1	53.1	29.1	20.1	35.3	0.0	0.0	0.0	
Gainesville MSA	302	68,637	5.2	5,874	5.1	10.9	3.9	15.0	16.9	10.8	30.8	17.2	29.6	49.1	55.0	55.8	0.0	0.0	0.0	
Homosassa Springs MSA	60	7,232	1.0	4,160	0.0	0.0	0.0	8.1	16.7	7.4	75.5	71.7	70.6	16.4	11.7	22.1	0.0	0.0	0.0	
Jacksonville MSA	208	43,683	3.5	43,349	3.7	1.9	1.0	18.6	20.2	11.8	41.7	38.5	42.4	36.0	39.4	44.8	0.0	0.0	0.0	
Lakeland-MSA	159	21,925	2.7	19,630	1.3	0.0	0.4	19.2	16.4	14.3	54.7	69.2	55.4	24.9	14.5	29.9	0.0	0.0	0.0	
Naples MSA	102	37,239	1.7	10,467	1.0	5.9	2.0	19.2	14.7	18.0	45.4	45.1	51.1	34.4	34.3	28.9	0.0	0.0	0.0	
Ocala MSA	151	22,681	2.6	9,516	0.0	0.0	0.0	13.0	11.3	9.4	73.1	64.2	75.5	13.9	24.5	15.2	0.0	0.0	0.0	
Orlando MSA	854	237,193	14.6	81,033	0.5	0.2	0.2	20.0	19.2	15.5	43.8	37.2	44.3	35.7	43.3	40.0	0.0	0.0	0.0	
Palm Bay MSA	351	38,166	6.0	22,106	1.2	0.9	0.5	18.8	37.6	14.4	46.9	41.9	47.0	33.1	19.7	38.2	0.0	0.0	0.0	
Port St Lucie MSA	442	81,575	7.5	16,844	1.0	0.2	0.2	14.7	14.7	7.3	57.5	52.5	64.0	26.8	32.6	28.5	0.0	0.0	0.0	
Sebastian MSA	170	36,394	2.9	5,024	1.1	0.6	0.6	11.9	11.8	8.6	58.7	55.3	64.9	28.3	32.4	25.8	0.0	0.0	0.0	
Sebring MSA	25	2,576	0.4	2,063	0.0	0.0	0.0	7.2	4.0	3.6	80.1	80.0	75.4	12.7	16.0	20.9	0.0	0.0	0.0	
Non-MSA Florida	147	12,153	2.5	3,130	0.0	0.0	0.0	12.8	17.0	8.8	66.6	57.8	66.1	20.7	25.2	25.1	0.0	0.0	0.0	
Total	5,863	1,491,894	100.0	481,869	1.7	1.6	0.9	20.0	19.6	14.5	44.1	38.4	44.2	34.2	40.4	40.4	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg
Full Review:																			
Miami MSA	2,135	747,974	36.4	144,769	22.4	3.9	2.2	17.3	14.2	9.7	18.9	13.5	17.7	41.3	67.5	53.9	0.0	0.8	16.4
Tampa MSA	418	88,080	7.1	96,087	20.6	8.9	3.8	18.2	21.8	13.7	19.6	14.6	19.5	41.6	54.1	44.8	0.0	0.7	18.2
Limited Review:																			
Deltona MSA	339	46,387	6.3	17,817	20.0	7.7	4.0	18.0	26.0	15.0	21.7	17.1	21.1	40.3	48.4	41.6	0.0	1.3	18.3
Gainesville MSA	302	68,637	5.2	5,874	22.8	5.3	3.5	17.1	21.9	12.8	18.0	12.3	19.3	42.0	58.9	46.5	0.0	1.7	17.9
Homosassa Springs MSA	60	7,232	1.0	4,160	17.5	8.3	7.5	20.5	41.7	18.5	21.4	16.7	21.2	40.6	33.3	36.5	0.0	0.0	16.4
Jacksonville MSA	208	43,683	4.1	43,349	21.7	9.1	5.3	17.6	26.0	14.9	21.4	13.9	20.1	39.3	50.0	39.7	0.0	2.6	20.0
Lakeland MSA	159	21,925	2.7	19,630	20.3	9.4	3.3	18.6	19.5	15.0	20.8	19.5	22.7	40.3	50.3	38.0	0.0	1.9	21.1
Naples MSA	102	37,239	1.7	10,467	20.3	3.2	2.0	18.7	11.8	10.5	19.4	8.8	16.8	41.6	76.5	56.6	0.0	6.5	14.0
Ocala MSA	151	22,681	2.6	9,516	18.1	6.0	4.0	19.8	23.2	14.5	22.8	18.5	21.7	39.3	51.0	40.6	0.0	2.1	19.2
Orlando MSA	854	237,193	14.6	81,033	20.1	5.9	3.4	18.6	19.1	13.4	20.8	14.3	19.7	40.5	60.3	46.2	0.0	0.5	17.2
Palm Bay MSA	351	38,166	6.7	22,106	19.4	16.5	5.1	18.8	27.1	14.7	21.5	18.2	19.1	40.4	37.9	43.1	0.0	0.8	18.0
Port St Lucie MSA	442	81,575	8.0	16,844	18.6	10.0	3.5	20.1	21.5	13.8	20.3	18.1	20.9	41.0	49.3	44.1	0.0	1.7	17.7
Sebastian MSA	170	36,394	2.9	5,024	20.3	7.6	3.3	17.0	20.0	12.8	22.0	17.6	18.5	40.7	53.5	50.4	0.0	4.3	15.1
Sebring MSA	25	2,576	0.5	2,063	15.6	12.0	4.0	21.3	28.0	12.3	24.0	19.0	18.6	39.1	44.0	43.0	0.0	0.0	22.1
Non-MSA Florida	147	12,153	2.5	3,130	22.0	10.2	3.5	17.4	23.1	13.2	20.3	19.7	21.8	40.3	46.9	41.8	0.0	0.0	19.7
Total	5,863	1,491,894	100.0	481,869	21.0	6.7	3.4	18.1	19.3	12.7	20.0	15.0	19.3	40.9	58.1	47.0	0.0	0.8	17.7

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	
Full Review:																				
Miami MSA	3,272	135,124	53.8	242,848	3.3	3.9	3.2	21.9	22.3	20.5	30.3	30.8	28.5	43.6	42.3	46.8	0.8	0.7	0.9	
Tampa MSA	481	27,540	7.9	71,301	2.9	4.2	3.5	20.6	23.9	19.9	37.8	36.0	37.5	38.5	36.0	39.0	0.2	0.0	0.1	
Limited Review:																				
Deltona MSA	380	15,215	6.3	10,819	3.4	5.5	3.7	20.0	15.5	19.8	46.1	52.1	42.3	30.6	26.8	34.2	0.0	0.0	0.0	
Gainesville MSA	77	10,502	1.3	4,469	10.8	9.1	9.2	17.3	19.5	17.9	29.1	15.6	27.9	42.8	55.8	45.0	0.0	0.0	0.0	
Homosassa Springs MSA	28	781	0.5	2,835	0.0	0.0	0.0	8.8	11.1	9.9	75.3	75.0	72.6	15.9	21.4	17.5	0.0	0.0	0.0	
Jacksonville MSA	188	17,918	3.1	26,535	4.0	3.9	3.7	21.5	18.6	19.0	38.3	44.7	35.9	36.1	34.0	41.4	0.0	0.0	0.0	
Lakeland MSA	110	5,389	2.1	10,175	4.7	2.4	4.9	19.5	16.4	20.1	49.8	63.6	49.9	26.0	19.1	25.1	0.0	0.0	0.0	
Naples MSA	24	1,980	0.5	13,370	1.9	0.0	1.2	14.8	17.4	12.5	41.4	20.8	41.7	41.9	65.2	44.6	0.0	0.0	0.0	
Ocala MSA	61	4,008	1.0	5,942	0.0	0.0	0.0	17.9	24.6	18.1	55.0	42.6	52.8	27.1	32.8	29.1	0.0	0.0	0.0	
Orlando MSA	382	23,929	6.3	62,740	0.6	1.3	0.6	23.5	27.2	21.0	38.6	40.1	36.7	37.3	31.4	41.7	0.0	0.0	0.0	
Palm Bay MSA	495	17,837	8.1	11,299	1.8	1.6	1.7	22.3	28.3	23.3	41.9	44.6	39.9	33.9	25.5	35.0	0.0	0.0	0.0	
Port St Lucie MSA	304	17,696	5.2	11,518	1.8	0.9	1.5	18.7	33.6	19.3	52.7	46.7	48.0	26.8	19.1	31.0	0.1	0.0	0.2	
Sebastian MSA	97	3,745	1.6	4,033	4.8	7.7	7.2	8.8	13.4	8.8	56.0	54.6	53.8	30.2	26.8	29.6	0.2	0.0	0.6	
Sebring MSA	22	1,350	0.4	1,475	0.0	0.0	0.0	8.3	0.0	10.0	74.2	77.3	72.8	17.1	33.3	16.5	0.4	0.0	0.7	
Non-MSA Florida	156	8,304	2.6	2,500	0.0	0.0	0.0	14.3	14.7	12.8	66.7	70.5	67.4	19.0	14.7	19.9	0.0	0.0	0.0	
Total	6,077	291,317	100.0	481,859	2.8	3.3	2.9	21.0	22.6	19.9	37.0	37.7	34.3	38.8	36.0	42.4	0.4	0.4	0.5	

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full Review:											
Miami MSA	3,272	135,124	53.8	242,848	80.8	58.0	48.5	3.3	11.1	15.9	30.9
Tampa MSA	481	27,540	7.9	71,301	80.3	58.6	48.3	3.3	17.3	16.4	24.1
Limited Review:											
Deltona MSA	380	15,215	6.3	10,819	82.0	66.1	52.4	2.7	8.4	15.3	25.5
Gainesville MSA	77	10,502	1.3	4,469	78.4	74.0	50.4	3.6	10.4	18.0	15.6
Homosassa Springs MSA	28	781	0.5	2,835	83.5	64.3	53.9	2.4	10.5	14.1	28.6
Jacksonville MSA	188	17,918	3.1	26,535	79.2	58.0	47.7	3.7	19.7	17.1	22.3
Lakeland MSA	110	5,389	1.8	10,175	80.7	70.0	46.5	3.0	13.6	16.3	16.4
Naples MSA	24	1,980	0.8	13,370	81.0	79.2	41.9	3.0	11.1	15.9	13.0
Ocala MSA	61	4,008	1.0	5,942	82.0	65.6	49.9	3.0	16.4	15.0	18.0
Orlando MSA	382	23,929	6.3	62,740	80.9	65.4	47.4	3.1	12.0	16.0	22.5
Palm Bay MSA	495	17,837	8.1	11,299	81.2	64.0	48.9	3.2	10.3	15.6	25.7
Port St Lucie MSA	304	17,696	5.0	11,518	83.1	62.8	47.9	2.6	14.8	14.3	22.4
Sebastian MSA	97	3,745	1.8	4,033	78.3	60.8	46.4	2.6	14.4	19.1	24.7
Sebring MSA	22	1,350	0.4	1,475	81.4	63.6	55.9	1.5	12.5	17.1	40.0
Non-MSA Florida	156	8,304	2.6	2,500	80.1	64.1	41.0	2.8	14.7	17.0	21.2
Total	6,077	291,317	100.0	481,859	80.7	60.6	48.2	3.2	12.1	16.1	27.3

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: MAINE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Portland MSA	55.02	1,005	203,868	894	33,817	2	268	17	35,715	1,918	273,668	59.25
Non-MSA Maine	29.98	649	71,150	350	11,527	46	7,844	14	12,054	1,061	102,575	25.98
Limited Review:												
Bangor MSA	7.91	165	14,162	106	5,095	2	275	5	20,598	278	40,130	6.49
Lewiston MSA	7.09	136	12,716	112	5,593	0	0	0	0	248	18,309	8.28

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MAINE					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Portland MSA	25	86.21	10.73	16.00	27.98	36.00	47.97	44.00	13.33	4.00	2.92	4.35	2.04	4.00	0.00	
Non-MSA Maine	0	0.00	0.00	0.00	10.75	0.00	77.22	0.00	12.04	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Bangor MSA	2	6.90	0.83	0.00	28.31	0.00	57.60	50.00	13.26	50.00	5.26	0.00	0.00	9.09	0.00	
Lewiston MSA	2	6.90	18.71	0.00	32.57	0.00	45.94	100.00	2.78	0.00	4.00	0.00	0.00	33.33	0.00	

* Based on 2016 Peer Mortgage Data -- US and PR

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: TD Bank NA

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: MAINE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans						
Full Review:																
Portland MSA	2	4.00	2.70	0.00	7.46	0.00	64.03	0.00	25.81	100.00	9.20	0.00	0.00	11.32	10.00	
Non-MSA Maine	46	92.00	0.00	0.00	4.23	10.87	82.88	89.13	12.88	0.00	3.71	0.00	10.71	3.80	1.09	
Limited Review:																
Bangor MSA	2	4.00	0.00	0.00	11.58	0.00	60.70	100.00	27.72	0.00	18.42	0.00	0.00	24.14	0.00	
Lewiston MSA	0	0.00	0.53	0.00	3.16	0.00	70.00	0.00	26.32	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2016).

Institution ID: TD Bank NA

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MAINE			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Portland MSA	2	4.00	95.05	100.00	0.00	100.00	0.00	9.20	5.45
Non-MSA Maine	46	92.00	96.92	78.26	41.30	34.78	23.91	3.71	2.30
Limited Review:									
Bangor MSA	2	4.00	92.98	100.00	0.00	100.00	0.00	18.42	4.55
Lewiston MSA	0	0.00	96.32	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2016 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MAINE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Portland MSA	9	15,243	123	35,872	132	51,115	56.22	0	0
Non-MSA Maine	6	8,226	56	8,369	62	16,595	18.25	0	0
Limited Review:									
Bangor MSA	1	153	15	8,537	16	8,690	9.56	0	0
Lewiston MSA	6	7,440	23	3,286	29	10,726	11.80	0	0
Statewide Maine	5	1,856	3	1,933	8	3,789	4.17	1	50

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD BANK NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: MAINE		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017							
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Portland MSA	59.25	23	52.27	0.00	34.78	52.17	13.04	0	1	0	0	- 1	0	2.70	21.01	56.32	19.97
Non-MSA Maine	25.98	13	29.55	0.00	7.69	76.92	15.38	0	2	0	0	- 2	0	0.00	5.65	78.25	16.10
Limited Review:																	
Bangor MSA	6.49	5	11.36	0.00	40.00	60.00	0.00	0	1	0	0	- 1	0	0.00	16.44	56.26	24.31
Lewiston MSA	8.28	3	6.82	66.67	0.00	33.33	0.00	0	1	0	- 1	0	0	11.76	8.06	68.39	11.79

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System		Geography: Maine				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017					
MA/Assessment Area:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Portland MSA	59.25	32	55.17	0.00	34.38	53.12	12.50	2.70	21.01	56.32	19.97
Non-MSA Maine	25.98	13	22.41	0.00	7.69	76.92	15.39	0.00	5.65	78.25	16.10
Limited Review:											
Bangor MSA	6.49	6	10.34	0.00	33.33	66.67	0.00	0.00	16.44	56.26	24.31
Lewiston MSA	8.28	7	12.08	71.43	0.00	28.57	0.00	11.76	8.06	68.39	11.79

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg
Full Review:																			
Portland MSA	1,005	203,868	51.4	22,366	0.3	0.8	0.6	10.4	10.5	9.8	63.2	56.6	62.9	26.1	32.0	26.7	0.0	0.0	0.0
Non-MSA Maine	649	71,150	33.2	10,809	0.0	0.0	0.0	5.4	4.5	3.4	79.8	83.1	77.6	14.8	12.5	19.0	0.0	0.0	0.0
Limited Review:																			
Bangor MSA	165	14,162	8.4	3,771	0.2	0.0	0.0	17.8	18.8	11.6	56.5	58.2	54.7	25.4	23.0	33.8	0.0	0.0	0.0
Lewiston MSA	136	12,716	7.0	2,999	0.8	1.5	0.6	7.4	10.3	6.2	67.2	53.7	66.9	24.7	34.6	26.3	0.0	0.0	0.0
Total	1,955	301,896	100.0	39,945	0.2	0.5	0.4	8.9	9.2	7.9	69.6	65.3	66.4	21.2	25.0	25.3	0.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	
Full Review:																				
Portland MSA	1,005	203,868	51.4	22,366	19.0	9.5	5.2	18.3	19.9	16.7	23.6	20.8	22.6	39.2	47.4	40.5	0.0	2.5	15.1	
Non-MSA Maine	649	71,150	34.3	10,809	19.3	10.3	4.9	18.1	20.2	16.5	22.0	24.2	20.3	40.6	44.5	41.8	0.0	1.1	16.6	
Limited Review:																				
Bangor MSA	165	14,162	8.4	3,771	21.2	7.3	5.8	17.1	26.1	14.8	22.0	26.1	21.9	39.7	38.8	38.9	0.0	1.8	18.6	
Lewiston MSA	136	12,716	7.0	2,999	20.1	9.6	4.1	18.2	30.1	17.5	22.1	14.7	23.6	39.6	39.7	33.0	0.0	5.9	21.8	
Total	1,955	301,896	100.0	39,945	19.5	9.6	5.1	18.0	21.2	16.5	22.6	21.9	22.0	39.9	45.2	40.1	0.0	2.1	16.3	

*Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	
Full Review:																				
Portland- MSA	894	33,817	61.1	11,593	8.0	7.9	7.5	10.4	9.3	10.0	57.0	54.4	55.3	24.6	28.4	27.2	0.0	0.0	0.0	
Non-MSA Maine	350	11,527	23.9	9,602	0.0	0.0	0.0	6.6	6.0	5.0	76.5	82.9	75.7	17.0	11.1	19.3	0.0	0.0	0.0	
Limited Review:																				
Bangor MSA	106	5,095	7.3	2,951	0.3	0.0	0.2	18.7	17.9	14.5	53.9	50.9	53.1	27.1	31.1	32.2	0.0	0.0	0.0	
Lewiston MSA	112	5,593	7.7	1,384	8.2	10.7	6.1	11.9	9.8	8.6	64.2	52.7	66.0	15.7	26.8	19.4	0.0	0.0	0.0	
Total	1,462	56,032	100.0	25,530	4.0	5.7	3.8	9.9	9.2	8.6	64.8	60.8	63.3	21.3	24.4	24.4	0.0	0.0	0.0	

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full Review:											
Portland MSA	894	33,817	61.1	11,593	77.3	51.6	46.3	6.3	12.3	16.4	36.1
Non-MSA Maine	350	11,527	24.0	9,602	76.8	58.3	50.0	5.3	12.0	17.9	29.7
Limited Review:											
Bangor MSA	106	5,095	7.3	2,951	73.4	56.6	44.1	6.9	22.6	19.8	20.8
Lewiston MSA	112	5,593	8.1	1,384	75.0	53.6	45.4	7.9	10.7	17.0	35.7
Total	1,462	56,032	100.0	25,530	76.5	53.7	47.4	6.1	12.9	17.4	33.4

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: MARYLAND				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Baltimore MSA	100.00	275	81,969	214	7,596	0	0	22	111,390	511	200,955	100.00
Statewide MD	0.00	0	0	0	0	0	0	1	51,243	1	51,243	0.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MARYLAND				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Baltimore MSA	4	8,252	46	47,535	50	55,787	53.70	0	0
Limited Review:									
Statewide Maryland	0	0	3	48,099	3	48,099	46.30	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD BANK NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: MARYLAND				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017					
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Baltimore MSA	100.00	7	100.00	14.29	0.00	28.57	57.14	1	0	0	1	0	0	9.73	23.57	34.00	31.79

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System		Geography: Maryland				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017					
MA/Assessment Area:	Deposits	Deposit-taking ATMs				Population					
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Baltimore MSA	100.00	10	100.00	30.00	0.00	20.00	50.00	9.73	23.57	34.00	31.79

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg
Baltimore MSA	275	81,969	100.0	95,736	6.2	10.5	3.7	18.1	20.4	14.3	37.2	26.5	38.6	38.5	42.5	43.4	0.0	0.0	0.0
Total	275	81,969	100.0	95,736	6.2	10.5	3.7	18.1	20.4	14.3	37.2	26.5	38.6	38.5	42.5	43.4	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg
Baltimore MSA	275	81,969	100.0	95,736	22.0	13.8	6.2	17.6	19.3	15.6	20.7	17.1	18.5	39.6	48.4	34.1	0.0	2.1	25.6
Total	275	81,969	100.0	95,736	22.0	13.8	6.2	17.6	19.3	15.6	20.7	17.1	18.5	39.6	48.4	34.1	0.0	2.1	25.6

*Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2014-16**

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg
Baltimore MSA	214	7,596	100.0	53,981	7.5	4.7	5.7	15.0	8.4	12.5	36.0	33.6	35.5	41.3	53.3	46.0	0.2	0.0	0.3
Total	214	7,596	100.0	53,981	7.5	4.7	5.7	15.0	8.4	12.5	36.0	33.6	35.5	41.3	53.3	46.0	0.2	0.0	0.3

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Baltimore MSA	214	7,596	100.0	53,981	76.9	65.0	47.6	5.7	11.7	17.4	23.4
Total	214	7,596	100.0	53,981	76.9	65.0	47.6	5.7	11.7	17.4	23.4

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: MASSACHUSETTS						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Springfield MSA	34.66	493	55,801	469	16,463	0	0	24	87,551	986	159,815	34.66
Worcester MSA	30.56	390	72,257	529	26,664	0	0	23	84,166	933	183,087	30.56
Limited Review:												
Barnstable Town MSA	23.71	292	83,078	408	11,495	2	30	19	28,855	721	123,458	23.71
Pittsfield MSA	8.52	72	10,166	103	4,058	0	0	10	13,102	185	27,326	8.52
Non-MSA Massachusetts	2.55	38	3,058	39	943	0	0	0	0	77	4,001	2.55

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MASSACHUSETTS									
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Springfield MSA	12	18,177	92	32,132	104	50,309	33.37	0	0
Worcester MSA	10	18,431	82	20,898	92	39,329	26.08	0	0
Limited Review:									
Barnstable Town MSA	9	23,716	37	17,395	46	41,111	27.27	0	0
Pittsfield MSA	2	4,199	38	9,202	40	13,401	8.89	0	0
Non-MSA Massachusetts	0	0	16	1,686	16	1,686	1.12	0	0
Statewide Massachusetts	4	2,770	2	2,167	6	4,937	3.27	3	1,217

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD BANK NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MASSACHUSETTS Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
MA/Assessment Area:	Deposit s % of Rated Area Deposit s in AA	Branches						Branch Openings/Closings						Population			
		# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Springfield MSA	34.66	19	35.85	15.79	42.11	21.05	21.05	0	2	0	0	- 2	0	14.33	15.29	31.76	35.74
Worcester MSA	30.56	14	26.42	14.29	21.43	42.86	21.43	0	0	0	0	0	0	8.97	17.35	39.23	33.86
Limited Review:																	
Barnstable Town MSA	23.71	14	26.42	14.29	14.29	71.43	0.00	0	3	0	0	- 3	0	1.33	11.73	70.56	16.38
Pittsfield MSA	8.52	5	9.43	20.00	0.00	40.00	40.00	0	0	0	0	0	0	8.43	11.43	50.47	29.67
Non-MSA Massachusetts	2.55	1	1.89	0.00	0.00	100.00	0.00	0	1	0	- 1	0	0	3.91	16.85	67.83	11.40

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System		Geography: Massachusetts						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
MA/Assessment Area:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Springfield MSA	34.66	37	41.11	13.52	43.24	18.92	24.32	14.33	15.29	31.76	35.74
Worcester MSA	30.56	25	27.78	12.00	20.00	44.00	16.00	8.97	17.35	39.23	33.86
Limited Review:											
Barnstable Town MSA	23.71	17	18.89	17.65	17.65	64.70	0.00	1.33	11.73	70.56	16.38
Pittsfield MSA	8.52	7	7.78	28.57	0.00	28.57	42.86	8.43	11.43	50.47	29.67
Non-MSA Massachusetts	2.55	4	4.44	0.00	25.00	75.00	0.00	3.91	16.85	67.83	11.40

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	
Full Review:																				
Springfield MSA	493	55,801	38.4	15,270	3.3	5.9	3.2	15.4	22.9	15.1	41.3	38.1	40.6	40.0	33.1	41.2	0.0	0.0	0.0	
Worcester MSA	390	72,257	30.4	28,189	2.2	4.4	1.7	12.9	19.5	11.3	47.2	43.3	44.6	37.7	32.8	42.3	0.0	0.0	0.0	
Limited Review:																				
Barnstable Town MSA	292	83,078	22.7	11,664	0.3	1.7	0.4	10.2	17.1	11.7	77.2	70.5	75.5	12.3	10.6	12.4	0.0	0.0	0.0	
Pittsfield MSA	72	10,166	5.6	3,145	0.6	1.4	0.4	6.9	15.3	6.7	69.5	58.3	69.4	22.9	25.0	23.5	0.0	0.0	0.0	
Non-MSA Massachusetts	38	3,058	3.0	1,994	0.0	0.0	0.0	20.5	57.9	20.9	64.5	31.6	64.0	15.0	10.5	15.0	0.0	0.0	0.0	
Total	1,285	224,360	100.0	60,262	2.0	4.0	1.7	13.1	21.2	12.4	52.7	48.0	51.5	32.2	26.8	34.3	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	
Full Review:																				
Springfield MSA	493	55,801	38.4	15,270	23.6	12.4	5.5	16.1	24.7	19.3	19.1	26.8	23.3	41.2	35.1	37.3	0.0	1.0	14.5	
Worcester MSA	390	72,257	30.4	28,189	20.6	14.4	5.0	16.5	29.7	15.9	21.9	18.7	22.3	41.0	35.6	41.1	0.0	1.5	15.7	
Limited Review:																				
Barnstable Town MSA	292	83,078	23.3	11,664	18.5	6.5	3.0	18.5	24.0	12.3	23.5	19.2	19.2	39.4	49.7	55.0	0.0	1.0	10.5	
Pittsfield MSA	72	10,166	5.6	3,145	21.8	16.7	8.0	17.0	23.6	16.9	22.6	18.1	18.9	38.6	41.7	42.5	0.0	0.0	13.7	
Non-MSA Massachusetts	38	3,058	3.8	1,994	21.8	23.7	10.0	19.3	34.2	24.7	23.3	18.4	24.9	35.6	21.1	28.2	0.0	6.3	12.2	
Total	1,285	224,360	100.0	60,262	21.4	12.2	5.1	16.8	26.3	16.4	21.3	21.9	21.9	40.5	38.5	42.5	0.0	1.1	14.2	

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Busi	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	
Full Review:																				
Springfield MSA	469	16,463	30.3	12,761	14.0	10.9	11.5	17.2	16.8	15.1	34.3	38.8	35.6	34.3	33.5	37.6	0.2	0.0	0.2	
Worcester MSA	529	26,664	34.2	13,789	8.5	11.2	7.1	16.9	20.8	16.6	38.8	37.1	38.5	35.7	31.0	37.8	0.1	0.0	0.0	
Limited Review:																				
Barnstable Town MSA	408	11,495	26.4	6,861	7.5	6.6	6.9	14.4	13.7	14.1	65.6	66.4	67.0	12.5	13.2	12.1	0.0	0.0	0.0	
Pittsfield M/SA	103	4,058	6.7	2,372	7.8	3.9	7.5	7.8	12.6	6.5	63.0	59.2	62.1	21.4	24.3	23.9	0.0	0.0	0.0	
Non-MSA Massachusetts	39	943	2.5	1,174	0.0	0.0	0.0	29.4	33.3	23.3	56.4	64.1	57.5	14.3	10.0	19.3	0.0	0.0	0.0	
Total	1,548	59,623	100.0	36,957	9.6	9.1	8.4	16.4	17.5	15.2	44.7	47.5	44.9	29.2	25.9	31.5	0.1	0.0	0.1	

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full Review:											
Springfield MSA	469	16,463	30.3	12,761	76.4	53.1	40.8	5.7	13.4	17.9	33.5
Worcester MSA	529	26,664	34.2	13,789	76.9	48.0	44.0	5.7	17.2	17.4	34.8
Limited Review:											
Barnstable Town MSA	408	11,495	26.4	6,861	80.1	56.4	45.8	4.3	11.5	15.7	32.1
Pittsfield MSA	103	4,058	6.7	2,372	76.1	57.3	49.4	5.7	13.6	18.1	29.1
Non-MSA Massachusetts	39	943	2.9	1,174	77.5	74.4	48.8	4.5	13.8	18.0	15.4
Total	1,548	59,623	100.0	36,957	77.2	53.0	43.7	5.4	14.1	17.3	32.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: NEW HAMPSHIRE						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Manchester MSA	47.02	538	81,234	834	29,380	5	668	15	32,613	1,392	143,895	47.27
Non-MSA New Hampshire	52.85	787	116,165	770	29,454	1	69	10	27,202	1,568	172,890	52.73
Statewide New Hampshire	0.13	0	0	0	0	0	0	5	77,000	5	77,000	0.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Manchester-Nashua MSA	7	21,764	132	37,040	139	58,804	52.65	0	0
Non-MSA New Hampshire	11	18,840	90	32,375	101	51,215	45.85	0	0
Limited Review:									
Statewide NH	2	727	2	951	4	1,678	1.50	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: NEW HAMPSHIRE Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Manchester MSA	47.27	22	53.66	9.09	27.27	40.91	22.73	0	1	0	0	- 1	0	7.63	20.13	40.31	31.92
Non-MSA New Hampshire	52.73	19	46.34	0.00	26.32	42.11	31.58	0	3	0	- 1	- 2	0	0.00	14.56	62.99	22.45

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System		Geography: NEW HAMPSHIRE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017					
MA/Assessment Area:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Manchester MSA	47.27	26	50.88	11.54	26.92	38.46	23.08	7.63	20.13	40.31	31.92
Non-MSA New Hampshire	52.73	25	49.02	0.00	20.00	52.00	28.00	0.00	14.56	62.99	22.45

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	
Full Review:																				
Manchester MSA	538	81,234	40.6	15,877	1.8	1.7	2.0	14.2	14.9	13.6	55.7	57.6	54.6	28.3	25.8	29.8	0.0	0.0	0.0	
Non-MSA New Hampshire	787	116,165	59.4	13,192	0.0	0.0	0.0	11.8	14.7	11.4	67.2	70.6	66.5	21.1	14.6	22.2	0.0	0.0	0.0	
Total	1,325	197,398	100.0	29,069	0.8	0.7	1.1	12.9	14.8	12.6	62.1	65.4	60.0	24.2	19.2	26.3	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	
Full Review:																				
Manchester MSA	538	81,234	40.6	15,877	18.9	13.4	4.6	18.8	27.5	17.8	23.6	25.3	23.6	38.7	31.8	35.8	0.0	2.0	18.2	
Non-MSA New Hampshire	787	116,165	59.4	13,192	17.6	8.1	3.6	18.6	24.9	16.1	23.3	25.5	20.7	40.5	39.3	43.5	0.0	2.2	16.1	
Total	1,325	197,398	100.0	29,069	18.2	10.3	4.1	18.7	26.0	17.0	23.4	25.4	22.3	39.7	36.2	39.3	0.0	2.1	17.2	

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg
Manchester MSA	834	29,380	52.0	8,463	11.7	7.3	9.9	14.3	12.6	13.6	49.0	56.2	47.7	24.6	23.7	28.3	0.4	0.4	0.5
Non-MSA New Hampshire	770	29,454	48.0	8,816	0.0	0.0	0.0	13.1	14.0	12.9	66.6	67.9	66.3	20.3	18.1	20.7	0.0	0.0	0.0
Total	1,604	58,834	100.0	17,279	5.3	3.8	4.8	13.7	13.3	13.3	58.7	61.8	57.2	22.2	21.0	24.4	0.2	0.2	0.2

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Manchester MSA	834	29,380	52.0	8,463	78.0	48.6	42.1	6.2	15.6	15.9	35.9
Non-MSA New Hampshire	770	29,454	48.0	8,816	77.2	56.4	44.1	5.4	10.8	17.4	32.9
Total	1,604	58,834	100.0	17,279	77.5	52.3	43.1	5.7	13.3	16.7	34.4

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: NEW JERSEY						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Atlantic City MSA	36.17	310	42,681	470	10,365	1	40	7	3,496	788	54,582	35.97
Trenton MSA	27.53	218	51,349	371	11,412	1	30	10	2,943	600	65,774	36.72
Limited Review:												
Ocean City MSA	21.83	279	91,736	195	6,946	0	0	1	10,000	475	108,682	15.48
Vineland MSA	14.34	121	10,167	189	4,561	0	0	6	10,407	316	25,135	11.82
Statewide New Jersey	0.14	0	0	0	0	0	0	3	108,062	3	108,062	0.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW JERSEY				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Atlantic City MSA	0	0	36	34,667	36	34,667	36.73	0	0
Trenton MSA	3	6,968	79	13,640	82	20,608	21.83	0	0
Limited Review:									
Ocean City MSA	1	179	7	14,386	8	14,565	15.43	0	0
Vineland MSA	0	0	25	13,823	25	13,823	14.65	0	0
Statewide New Jersey	4	4,356	1	6,363	5	10,719	11.36	1	120

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD BANK NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: NEW JERSEY																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Atlantic City MSA	35.97	8	32.00	12.50	25.00	25.00	37.50	0	0	0	0	0	0	9.88	21.50	35.04	32.77
Trenton MSA	36.72	9	36.00	0.00	33.33	22.22	44.44	1	0	0	0	0	1	15.20	19.28	28.07	37.04
Limited Review:																	
Ocean City MSA	15.48	4	16.00	0.00	25.00	75.00	0.00	0	0	0	0	0	0	4.08	17.29	59.06	19.57
Vineland MSA	11.82	4	16.00	0.00	50.00	50.00	0.00	0	1	0	0	- 1	0	7.77	13.11	47.77	26.43

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System		Geography: New Jersey				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017					
MA/Assessment Area:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Atlantic City MSA	35.97	16	40.00	18.75	18.75	25.00	37.50	9.88	21.50	35.04	32.77
Trenton MSA	36.72	13	32.50	0.00	38.46	23.08	38.46	15.20	19.28	28.07	37.04
Limited Review:											
Ocean City MSA	15.48	5	12.50	0.00	40.00	60.00	0.00	4.08	17.29	59.06	19.57
Vineland MSA	11.82	6	15.00	0.00	50.00	50.00	0.00	7.77	13.11	47.77	26.43

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner-Occupied Housing Units	% Bank Loans	Agg	
Full Review:																				
Atlantic City MSA	310	40,681	33.4	7,123	2.9	1.9	1.3	14.1	11.6	10.7	55.4	52.9	53.8	27.6	33.5	34.2	0.0	0.0	0.0	
Trenton MSA	218	51,389	23.5	8,324	6.9	2.3	2.6	14.1	13.3	9.9	36.7	36.2	37.3	42.3	48.2	50.2	0.0	0.0	0.0	
Limited Review:																				
Ocean City MSA	279	91,736	30.1	6,329	3.0	1.1	1.4	22.5	23.7	18.7	46.2	45.9	53.3	28.4	29.4	26.6	0.0	0.0	0.0	
Vineland MSA	121	10,167	13.0	2,776	2.2	1.7	0.9	11.7	11.6	8.9	61.9	59.5	62.4	24.2	27.3	27.8	0.0	0.0	0.0	
Total	928	193,973	100.0	24,552	4.3	1.7	1.7	15.0	15.6	12.3	47.8	47.7	49.0	32.9	34.9	37.0	0.0	0.0	0.0	

Source: 2010 U.S Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg
Full Review:																			
Atlantic City MSA	310	40,681	35.1	7,123	21.3	7.7	3.3	17.8	18.1	11.0	20.5	25.5	17.9	40.4	47.4	45.4	0.0	1.9	22.4
Trenton MSA	218	51,389	26.2	8,324	22.8	14.7	6.4	16.8	25.2	15.3	19.2	11.9	17.4	41.2	47.2	43.2	0.0	1.2	17.6
Limited Review:																			
Ocean City MSA	279	91,736	30.4	6,329	21.8	6.5	3.9	17.9	16.8	8.3	19.7	17.6	14.1	40.6	58.4	63.9	0.0	1.1	9.8
Vineland MSA	121	10,167	13.2	2,776	23.9	7.4	2.7	15.8	19.8	12.9	19.9	24.0	20.9	40.4	44.6	34.7	0.0	6.2	28.9
Total	928	193,973	100.0	24,552	22.4	8.9	4.4	17.1	19.6	12.0	19.8	19.7	17.1	40.7	50.3	48.2	0.0	1.4	18.2

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2014-16**

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Busi	% Bank Loans	Agg	% Busi	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg
Full Review:																			
Atlantic City MSA	470	10,365	39.7	6,348	8.7	6.2	8.6	13.8	13.0	15.0	50.3	50.0	49.5	27.1	30.6	26.7	0.1	0.6	0.2
Trenton MSA	371	11,412	30.3	8,909	11.1	7.0	7.5	10.5	14.8	10.4	29.6	32.6	26.3	48.8	45.6	55.8	0.0	0.0	0.0
Limited Review:																			
Ocean City MSA	195	6,947	15.9	3,085	2.2	3.1	1.7	23.4	20.0	24.5	45.1	38.5	43.9	29.3	38.5	29.8	0.0	0.0	0.0
Vineland MSA	189	4,561	17.3	2,310	9.7	16.4	17.1	13.9	12.7	8.4	57.6	46.6	56.1	18.8	23.8	18.1	0.0	1.4	0.3
Total	1,225	33,284	100.0	20,652	8.9	7.5	8.1	13.9	14.6	13.7	41.7	42.4	39.4	35.6	35.3	38.8	0.0	0.2	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full Review:											
Atlantic City MSA	470	10,365	38.4	6,348	77.7	55.1	36.9	5.0	6.8	17.3	38.1
Trenton MSA	371	11,412	31.1	8,909	74.4	47.4	42.8	7.3	14.8	18.3	37.7
Limited Review:											
Ocean City MSA	195	6,947	15.9	3,085	79.0	58.5	44.7	4.3	9.7	16.7	31.8
Vineland MSA	189	4,561	16.6	2,310	74.9	55.0	35.5	7.2	14.3	18.0	30.7
Total	1,225	33,284	100.0	20,652	76.1	53.3	40.5	6.1	10.9	17.7	35.8

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Albany MSA	28.77	139	20,728	137	6,503	0	0	14	19,875	290	47,106	28.63
Limited Review:												
MSA 24020 Glens Falls	35.37	205	18,965	147	3,493	1	20	7	21,617	360	44,095	33.09
MSA 28740 Kingston	3.65	12	935	20	715	0	0	5	5,900	37	7,550	9.48
Non-MSA New York	32.22	193	23,627	126	3,066	3	15	10	42,895	332	69,603	28.80

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEW YORK			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			Unfunded Commitments**	
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments				
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Albany MSA	6	15,994	64	36,107	70	52,101	53.69	0	0
Limited Review:									
Glens Falls MSA	3	3,073	27	1,667	30	4,740	4.88	0	0
Kingston MSA	1	9,246	9	14,149	10	23,395	24.11	0	0
Non-MSA New York	4	11,112	39	2,071	43	13,183	13.58	0	0
Statewide New York	2	1,302	1	2,324	3	3,626	3.74	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: NEW YORK				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography*										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
Full Review:																								
Albany MSA	28.63	7	28.00	14.29	14.29	42.86	28.57	0	3	0	0	- 1	- 2	5.21	12.70	49.24	31.67							
Limited Review:																								
Glens Falls MSA	33.09	10	40.00	0.00	10.00	80.00	10.00	0	2	0	0	- 2	0	0.00	7.04	82.56	10.40							
Kingston MSA	9.48	1	4.00	0.00	100.00	0.00	0.00	0	0	0	0	0	0	7.37	15.58	55.66	21.39							
Non-MSA New York	28.80	7	28.00	14.29	14.29	71.43	0.00	0	0	0	0	0	0	1.26	12.40	56.76	28.32							

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System		Geography: New York				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017					
MA/Assessment Area:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Albany MSA	28.63	7	26.92	14.29	14.29	42.86	28.56	5.21	12.70	49.24	31.67
Limited Review:											
Glens Falls MSA	33.09	12	46.15	0.00	16.67	75.00	8.33	0.00	7.04	82.56	10.40
Kingston MSA	9.48	1	3.85	0.00	100.00	0.00	0.00	7.37	15.58	55.66	21.39
Non-MSA New York	28.80	6	23.08	0.00	16.67	83.33	0.00	1.26	12.40	56.76	28.32

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	
Full Review:																				
Albany MSA	139	20,728	25.3	16,102	2.4	5.8	1.8	8.4	9.4	7.4	53.1	55.4	53.9	36.1	29.5	36.9	0.0	0.0	0.0	
Limited Review:																				
Glens Falls MSA	205	18,965	37.3	2,977	0.0	0.0	0.0	1.7	1.5	2.0	84.4	83.9	81.8	13.9	14.6	16.2	0.0	0.0	0.0	
Kingston MSA	12	935	2.2	1,087	0.0	0.0	0.0	14.1	8.3	13.8	82.8	83.3	83.8	3.1	8.3	2.4	0.0	0.0	0.0	
Non-MSA New York	193	23,627	35.2	3,885	0.0	0.0	0.0	7.5	6.7	5.6	46.0	45.1	44.6	46.5	48.2	49.8	0.0	0.0	0.1	
Total	549	64,255	100.0	24,051	1.4	1.5	1.2	7.6	5.5	6.7	57.7	63.0	57.2	33.4	30.1	34.8	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	
Full Review:																				
Albany MSA	139	20,728	27.0	16,102	18.2	12.2	6.0	16.8	21.6	19.0	21.8	26.6	24.5	43.3	38.8	36.7	0.0	2.0	13.9	
Limited Review:																				
Glens Falls MSA	205	18,965	37.3	2,977	18.1	12.7	5.1	19.2	24.9	18.3	23.6	30.7	24.0	39.1	31.7	39.1	0.0	0.0	13.5	
Kingston MSA	10	845	3.4	1,087	21.4	37.5	7.4	21.3	30.0	18.8	22.9	33.3	25.4	34.4	40.0	38.4	0.0	0.0	10.1	
Non-MSA New York	193	23,627	36.7	3,885	17.6	7.3	3.1	16.9	21.8	11.0	18.5	21.8	21.8	47.0	48.7	48.3	0.0	1.5	15.8	
Total	549	64,255	100.0	24,051	18.2	10.9	5.5	17.4	23.0	17.6	21.4	26.2	24.0	43.0	39.5	38.9	0.0	0.6	14.0	

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2014-16

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	
Full Review:																				
Albany MSA	137	6,503	31.9	9,754	6.0	6.6	5.2	13.5	12.4	9.8	48.0	52.6	49.5	32.5	28.5	35.4	0.0	0.0	0.0	
Limited Review:																				
Glens Falls MSA	147	3,494	36.5	2,142	0.0	0.0	0.0	6.4	3.1	6.6	80.0	83.7	78.6	13.6	14.3	14.8	0.0	0.0	0.0	
Kingston MSA	20	715	5.5	1,440	0.0	0.0	0.0	18.4	11.1	16.1	79.6	95.0	81.0	2.1	0.0	2.9	0.0	0.0	0.0	
Non-MSA New York	126	3,066	29.3	3,465	0.0	0.0	0.0	15.4	20.6	16.0	44.0	38.9	43.3	40.2	40.5	40.5	0.4	0.0	0.1	
Total	430	13,777	100.0	16,801	3.6	2.1	3.0	13.4	10.9	11.2	53.7	61.2	54.7	29.3	25.8	31.0	0.1	0.0	0.0	

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full Review:											
Albany MSA	137	6,503	31.9	9,754	74.0	50.4	45.3	6.2	12.4	19.8	37.2
Limited Review:											
Glens Falls MSA	147	3,494	38.2	2,142	77.4	59.9	43.9	5.0	7.5	17.6	32.7
Kingston MSA	20	715	5.5	1,440	76.8	65.0	46.6	5.1	20.0	18.1	30.0
Non-MSA New York	126	3,066	29.3	3,465	76.3	52.4	42.7	5.0	9.5	18.7	38.1
Total	430	13,777	100.0	16,801	75.1	54.9	44.7	5.7	9.5	19.2	35.6
<i>Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table 1. Lending Volume

LENDING VOLUME		Geography: NORTH CAROLINA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Asheville MSA	54.34	319	108,564	230	13,731	1	15	9	10,171	559	132,481	55.63
Limited Review:												
Hickory MSA	4.78	38	6,439	11	1,632	0	0	0	0	49	8,071	3.51
Wilmington MSA	20.78	126	57,736	84	2,541	0	0	3	444	213	60,721	21.84
Non-MSA North Carolina	19.80	109	12,110	93	3,561	0	0	1	2,010	203	17,681	19.02
Statewide NC	0.29	0	0	0	0	0	0	4	11,000	4	11,000	0.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Asheville MSA	2	5,964	120	7,866	122	13,830	49.79	0	0
Limited Review:									
Hickory MSA	0	0	7	549	7	549	1.98	0	0
Wilmington MSA	0	0	28	5,100	28	5,100	18.36	0	0
Non-MSA North Carolina	2	6,494	33	1,752	35	8,246	29.69	0	0
Statewide North Carolina	0	0	1	53	1	53	0.19	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD BANK NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: NORTH CAROLINA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Asheville MSA	55.63	8	57.14	0.00	37.50	37.50	25.00	0	1	0	0	- 1	0	1.65	13.14	63.68	21.54
Limited Review:																	
Hickory MSA	3.51	1	7.14	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	11.76	73.40	14.84
Wilmington MSA	21.84	2	14.29	50.00	0.00	50.00	0.00	0	2	0	0	- 1	- 1	13.16	17.00	40.14	29.69
Non-MSA North Carolina	19.02	3	21.43	0.00	0.00	66.67	33.33	0	3	0	0	- 3	0	0.00	14.90	79.68	5.42

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System		Geography: North Carolina						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
MA/Assessment Area:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Asheville MSA	55.63	8	57.14	0.00	37.50	37.50	25.00	1.65	13.14	63.68	21.54
Limited Review:											
Hickory MSA	3.51	1	7.14	0.00	0.00	100.00	0.00	0.00	11.76	73.40	14.84
Wilmington MSA	21.84	2	14.29	50.00	0.00	50.00	0.00	13.16	17.00	40.14	29.69
Non-MSA North Carolina	19.02	3	21.43	0.00	0.00	66.67	33.33	0.00	14.90	79.68	5.42

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	
Full Review:																				
Asheville MSA	319	108,564	53.9	15,488	0.9	1.3	1.2	12.7	13.2	12.2	65.9	46.7	64.4	20.5	38.6	22.2	0.0	0.3	0.0	
Limited Review:																				
Hickory MSA	38	6,439	6.4	1,795	0.0	0.0	0.0	19.4	28.9	20.2	75.4	68.4	73.5	5.2	2.6	6.4	0.0	0.0	0.0	
Wilmington MSA	126	57,736	21.3	12,685	3.7	3.2	2.5	11.8	15.1	8.8	47.8	38.1	49.5	36.6	43.7	39.1	0.0	0.0	0.0	
Non-MSA North Carolina	109	12,110	18.4	4,634	1.5	0.9	1.1	7.9	9.2	6.5	79.4	74.3	76.2	11.1	15.6	16.1	0.0	0.0	0.0	
Total	592	184,848	100.0	34,602	1.6	1.5	1.6	12.0	13.9	10.6	65.4	51.4	61.0	20.9	33.1	26.8	0.0	0.2	0.0	

Source: 2010 U.S Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	
Full Review:																				
Asheville MSA	319	108,564	53.9	15,488	19.4	8.2	4.0	18.7	17.6	14.3	21.5	17.2	21.7	40.4	55.8	47.2	0.0	1.3	12.8	
Limited Review:																				
Hickory MSA	38	6,439	7.6	1,795	22.7	25.0	6.9	18.8	34.2	19.2	23.9	21.1	23.6	34.5	26.3	37.3	0.0	0.0	13.1	
Wilmington MSA	126	57,736	26.2	12,685	20.5	10.3	3.3	17.7	20.6	12.4	22.0	10.3	18.1	39.8	57.9	49.8	0.0	1.7	16.3	
Non-MSA North Carolina	109	12,110	18.6	4,634	21.2	13.8	3.6	18.3	32.1	15.2	21.8	28.8	20.5	38.7	33.9	48.1	0.0	2.8	12.6	
Total	592	184,848	100.0	34,602	20.4	10.3	3.8	18.4	22.0	14.0	21.9	16.4	20.3	39.3	50.3	47.8	0.0	1.0	14.1	

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2014-16**

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	
Full Review:																				
Asheville MSA	230	13,731	56.6	9,418	4.6	6.3	4.6	16.0	19.6	17.5	54.8	52.2	51.4	24.6	23.9	26.6	0.0	0.0	0.0	
Limited Review:																				
Hickory MSA	11	1,632	3.7	904	0.0	0.0	0.0	30.9	50.0	28.8	63.6	54.5	64.2	5.4	0.0	7.1	0.0	0.0	0.0	
Wilmington MSA	84	2,541	20.2	8,561	7.4	8.8	5.4	14.0	10.5	11.4	38.9	50.0	40.8	39.5	36.9	42.2	0.2	0.0	0.2	
Non-MSA North Carolina	93	3,561	29.2	2,778	3.5	2.5	2.2	6.7	10.8	6.6	74.4	80.6	73.4	15.4	7.5	17.8	0.0	0.0	0.0	
Total	418	21,465	100.0	21,661	5.0	3.8	4.4	14.7	15.8	14.2	53.8	58.1	50.5	26.4	22.2	30.8	0.1	0.0	0.1	

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full Review:											
Asheville MSA	230	13,731	55.0	9,418	79.1	60.4	52.3	3.8	10.9	17.1	28.7
Limited Review:											
Hickory MSA	11	1,632	3.7	904	77.5	81.8	51.5	5.2	20.0	17.3	0.0
Wilmington MSA	84	2,541	24.1	8,561	79.1	58.3	45.6	4.5	6.0	16.5	35.7
Non-MSA North Carolina	93	3,561	22.2	2,778	79.4	60.2	49.6	3.8	9.7	16.8	30.1
Total	418	21,465	100.0	21,661	79.0	60.5	49.3	4.1	9.8	16.9	29.7

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: SOUTH CAROLINA						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Greenville MSA	19.49	578	114,340	356	21,486	1	375	18	7,600	953	143,801	39.03
Limited Review:												
Augusta MSA	5.61	245	51,755	23	946	4	458	1	723	273	53,882	1.59
Charleston MSA	19.17	784	448,688	137	13,479	0	0	11	15,648	932	477,771	7.00
Charlotte MSA	3.66	143	32,064	35	1,209	0	0	0	0	178	33,273	3.53
Columbia MSA	14.54	421	81,611	271	13,441	1	380	11	11,476	704	106,308	17.39
Florence MSA	1.05	21	2,045	25	1,246	0	0	6	13,157	52	16,448	1.91
Hilton Head Island MSA	15.36	631	271,248	116	7,200	0	0	1	1,470	748	279,918	7.59
Myrtle Beach MSA	12.09	419	74,551	161	8,787	0	0	9	7,426	589	90,764	9.93
Spartanburg MSA	3.13	111	17,607	40	4,989	0	0	1	4,930	152	27,526	3.48
Non-MSA South Carolina	5.86	199	58,757	83	3,633	2	60	2	1,188	286	63,638	8.55
Statewide South Carolina	0.04	0	0	0	0	0	0	3	39,478	3	39,478	0.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: SOUTH CAROLINA									
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Greenville MSA	5	19,073	112	21,472	117	40,545	34.12	0	0
Limited Review:									
Augusta MSA	0	0	11	1,241	11	1,241	1.04	0	0
Charleston MSA	2	10,439	72	4,189	74	14,628	12.31	0	0
Charlotte MSA	1	649	16	3,101	17	3,750	3.16	0	0
Columbia MSA	1	3,407	48	17,628	49	21,035	17.70	0	0
Florence MSA	1	3,584	16	890	17	4,474	3.77	0	0
Hilton Head MSA	1	4,901	23	3,948	24	8,849	7.45	0	0
Myrtle Bch MSA	0	0	47	6,532	47	6,532	5.50	0	0
Spartanburg MSA	0	0	32	2,822	32	2,822	2.38	0	0
Non-MSA South Carolina	2	10,132	23	4,070	25	14,202	11.95	0	0
Statewide South Carolina	1	200	1	538	2	738	0.62	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD BANK NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: SOUTH CAROLINA Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Greenville MSA	39.03	19	30.65	5.26	21.05	31.58	42.11	0	2	0	- 1	- 1	0	5.32	23.60	41.71	29.37
Limited Review:																	
Augusta MSA	1.59	1	1.61	0.00	0.00	100.00	0.00	0	1	0	0	0	- 1	0.00	33.96	43.40	22.65
Charleston MSA	7.00	6	9.68	16.67	16.67	33.33	33.33	0	0	0	0	0	0	6.66	21.44	41.91	29.18
Charlotte MSA	3.53	3	4.84	33.33	0.00	33.33	33.33	0	0	0	0	0	0	2.71	24.33	42.21	29.97
Columbia MSA	17.39	13	20.97	7.69	23.08	30.77	38.46	0	1	0	0	- 1	0	5.50	24.83	33.65	33.60
Florence MSA	1.91	2	3.23	0.00	50.00	0.00	50.00	0	1	0	0	- 1	0	4.30	17.51	47.64	30.54
Hilton Head Island MSA	7.59	5	8.06	0.00	40.00	40.00	20.00	0	0	0	0	0	0	0.00	36.44	43.58	19.97
Myrtle Beach MSA	9.93	7	11.29	14.29	14.29	71.43	0.00	0	3	0	0	- 1	- 2	2.09	17.82	68.04	11.71
Spartanburg MSA	3.48	1	1.61	0.00	0.00	0.00	100.00	0	0	0	0	0	0	4.85	20.84	43.55	30.76
Non-MSA South Carolina	8.55	5	8.06	0.00	20.00	40.00	40.00	0	1	0	0	0	- 1	0.00	13.29	50.56	36.15

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System		Geography: South Carolina				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017					
MA/Assessment Area:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Greenville MSA	39.03	20		5.00	25.00	30.00	40.00	5.32	23.60	41.71	29.37
Limited Review:											
Augusta MSA	1.59	1		0.00	0.00	100.00	0.00	0.00	33.96	43.40	22.65
Charleston MSA	7.00	5		20.00	20.00	40.00	20.00	6.66	21.44	41.91	29.18
Charlotte MSA	3.53	4		50.00	0.00	25.00	25.00	2.71	24.33	42.21	29.97
Columbia MSA	17.39	13		7.69	23.08	30.77	38.46	5.50	24.83	33.65	33.60
Florence MSA	1.91	2		0.00	50.00	0.00	100.00	4.30	17.51	47.64	30.54
Hilton Head Island MSA	7.59	5		0.00	40.00	40.00	20.00	0.00	36.44	43.58	19.97
Myrtle Beach MSA	9.93	7		14.29	14.29	71.42	0.00	2.09	17.82	68.04	11.71
Spartanburg MSA	3.48	1		0.00	0.00	0.00	100.00	4.85	20.84	43.55	30.76
Non-MSA South Carolina	8.55	5		0.00	20.00	40.00	40.00	0.00	13.29	50.56	36.15

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	
Full Review:																				
Greenville MSA	578	114,340	16.3	28,531	2.7	2.1	1.4	17.7	18.5	11.4	50.8	45.8	45.4	28.8	33.6	41.9	0.0	0.0	0.0	
Limited Review:																				
Augusta MSA	245	51,755	6.9	5,288	2.0	1.6	1.2	24.2	30.6	22.2	42.1	43.7	33.6	31.7	24.1	43.1	0.0	0.0	0.0	
Charleston MSA	784	448,644	22.1	34,885	1.7	1.3	1.1	18.3	8.9	14.7	48.7	22.3	46.5	31.3	67.5	37.7	0.0	0.0	0.0	
Charlotte MSA	143	32,064	4.0	11,568	2.4	2.1	1.5	22.4	24.5	14.6	38.7	36.4	31.3	36.5	37.1	52.6	0.0	0.0	0.0	
Columbia MSA	421	81,611	11.9	25,604	1.1	0.5	0.5	22.0	22.1	10.3	39.5	24.0	36.7	37.4	53.4	52.4	0.0	0.0	0.0	
Florence MSA	21	2,045	0.6	2,747	1.4	0.0	0.2	15.1	14.3	6.6	50.2	66.7	45.8	33.3	19.0	47.5	0.0	0.0	0.0	
Hilton Head Island MSA	631	271,248	17.8	8,916	0.7	1.3	0.3	24.9	9.8	17.3	36.5	30.0	41.3	37.9	59.0	41.1	0.0	0.0	0.0	
Myrtle Beach MSA	419	74,551	11.8	14,523	0.7	0.5	0.7	14.9	9.8	10.0	63.4	64.9	64.4	20.9	24.8	24.7	0.0	0.0	0.2	
Spartanburg MSA	111	17,607	3.1	9,231	1.7	0.0	0.4	15.9	18.0	10.0	53.4	52.3	54.7	29.0	29.7	34.9	0.0	0.0	0.0	
Non-MSA South Carolina	199	58,757	5.6	4,773	0.0	0.0	0.0	10.5	5.0	4.3	41.2	22.6	26.4	48.3	72.4	69.3	0.0	0.0	0.0	
Total	3,552	1,152,623	100.0	146,066	1.6	1.2	0.9	18.7	14.5	12.4	47.1	36.0	44.2	32.6	48.3	42.4	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	
Full Review:																				
Greenville MSA	578	114,340	16.3	28,531	22.0	10.7	5.7	16.9	23.4	15.8	19.9	19.4	20.8	41.2	45.5	40.9	0.0	1.0	16.7	
Limited Review:																				
Augusta MSA	245	51,755	6.9	5,288	22.9	6.9	6.1	15.5	19.2	14.8	18.5	24.5	20.7	43.2	49.4	35.2	0.0	0.0	23.1	
Charleston MSA	784	448,644	26.3	34,885	21.7	1.8	4.8	17.1	13.0	15.7	20.4	7.0	20.3	40.8	77.8	41.2	0.0	0.8	18.0	
Charlotte MSA	143	32,064	4.2	11,568	20.7	9.1	5.4	17.0	28.7	14.3	20.0	21.0	18.7	42.3	39.9	44.5	0.0	2.2	17.1	
Columbia MSA	421	81,611	11.9	25,604	20.9	10.9	6.1	17.1	27.1	16.9	20.5	17.1	18.5	41.4	44.2	33.9	0.0	1.1	24.6	
Florence MSA	21	2,045	0.8	2,747	21.8	11.8	4.3	16.9	33.3	11.9	19.6	38.1	21.2	41.8	19.0	42.6	0.0	0.0	19.9	
Hilton Head Island MSA	631	271,248	17.8	8,916	20.0	1.9	2.9	18.0	9.0	11.5	20.5	11.3	18.7	41.5	76.5	53.8	0.0	1.3	13.1	
Myrtle Beach MSA	419	74,551	11.8	14,523	21.1	6.4	4.0	17.4	15.8	13.5	21.9	14.6	19.7	39.6	62.8	49.6	0.0	0.7	13.2	
Spartanburg MSA	111	17,607	3.1	9,231	20.8	12.3	4.2	17.3	30.6	17.3	20.3	26.1	22.7	41.7	36.0	37.0	0.0	0.0	18.8	
Non-MSA South Carolina	199	58,757	5.6	4,773	18.7	3.0	2.2	15.9	8.5	8.0	17.0	16.1	15.6	48.4	71.9	60.4	0.0	1.9	13.7	
Total	3,552	1,152,623	100.0	146,066	21.2	5.8	5.0	17.0	17.5	15.1	20.1	14.9	19.8	41.7	61.1	41.9	0.0	0.7	18.2	

Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2014-16**

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	
Full Review:																				
Greenville MSA	356	21,486	28.5	15,537	4.6	4.8	3.7	20.1	23.0	16.9	40.6	40.7	37.9	34.7	31.5	41.5	0.0	0.0	0.0	
Limited Review:																				
Charleston MSA	137	13,479	11.0	15,803	4.5	7.3	4.4	22.7	8.8	18.2	40.9	31.4	38.2	31.9	52.6	39.2	0.0	0.0	0.0	
Charlotte MSA	35	1,209	3.5	4,257	5.2	6.7	4.1	22.5	8.6	18.1	36.5	51.4	30.8	35.7	37.1	46.9	0.1	0.0	0.0	
Columbia MSA	271	13,441	22.8	12,483	2.8	1.6	1.6	21.1	18.1	18.6	39.8	42.4	37.9	35.5	38.4	41.7	0.8	0.0	0.2	
Florence MSA	25	1,246	2.4	1,724	3.1	10.0	1.6	14.6	31.6	10.2	49.1	56.0	48.8	33.1	16.0	39.4	0.0	0.0	0.0	
Hilton Head Island MSA	116	7,200	9.3	4,778	3.7	5.2	3.6	21.5	14.7	21.1	34.9	40.5	31.7	39.9	39.7	43.6	0.0	0.0	0.0	
Myrtle Beach MSA	161	8,787	12.9	8,197	6.1	11.8	5.7	14.0	7.5	10.4	58.2	52.8	59.7	21.1	28.0	23.9	0.6	0.0	0.3	
Spartanburg MSA	40	4,989	3.2	4,744	2.7	0.0	1.8	20.6	15.4	16.3	45.1	72.5	46.5	31.6	17.5	35.4	0.0	0.0	0.0	
Non-MSA South Carolina	83	3,633	6.7	3,194	0.0	0.0	0.0	10.8	13.3	7.9	34.5	20.5	25.6	54.7	66.3	66.5	0.0	0.0	0.0	
Total	1,247	76,415	100.0	72,857	3.9	4.9	3.4	20.0	16.0	16.6	41.7	41.7	40.0	34.1	37.5	39.9	0.2	0.0	0.1	

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2014-16

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full Review:											
Greenville MSA	356	21,486	28.5	15,537	75.3	51.7	47.8	5.4	19.7	19.3	28.7
Limited Review:											
Augusta MSA	23	946	2.5	2,140	77.1	73.9	51.6	3.8	0.0	19.1	28.6
Charleston MSA	137	13,479	11.0	15,803	76.0	50.4	47.9	5.0	21.9	19.0	27.7
Charlotte MSA	35	1,209	2.8	4,257	77.4	60.0	48.5	5.0	10.0	17.6	34.3
Columbia MSA	271	13,441	21.7	12,483	75.2	54.2	51.9	5.2	18.8	19.6	26.9
Florence MSA	25	1,246	2.2	1,724	75.4	52.0	43.9	5.5	32.0	19.1	16.0
Hilton Head Island MSA	116	7,200	9.3	4,778	78.6	66.4	46.4	4.8	13.8	16.7	19.8
Myrtle Beach MSA	161	8,787	12.9	8,197	76.6	51.6	49.4	4.7	16.1	18.7	32.3
Spartanburg MSA	40	4,989	3.4	4,744	74.0	62.5	45.5	5.9	20.0	20.1	17.5
Non-MSA South Carolina	83	3,633	7.0	3,194	77.6	55.4	48.9	4.0	20.5	18.4	24.1
Total	1,247	76,415	100.0	72,857	75.9	54.7	48.6	5.1	18.3	19.0	27.0

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: VERMONT				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Burlington MSA	41.82	229	39,171	262	9,678	2	25	19	92,300	512	141,174	46.85
Non-MSA Vermont	58.02	354	54,858	342	11,239	3	52	12	21,570	711	87,719	53.15
Statewide Vermont	0.16	0	0	0	0	0	0	6	123,984	6	123,984	0.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: VERMONT				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Burlington MSA	7	16,126	86	22,276	93	38,402	48.78	0	0
Non-MSA Vermont	12	20,101	88	19,673	100	39,774	50.52	0	0
Limited Review:									
Statewide Vermont	1	115	2	435	3	550	0.70	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: TD BANK NA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: VERMONT																	
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017																	
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Opening s	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography*			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Burlington MSA	46.85	13	43.33	0.00	38.46	46.15	15.38	0	1	0	0	- 1	0	1.44	19.36	60.34	18.86
Non-MSA Vermont	53.15	17	56.67	0.00	17.65	64.71	17.65	0	1	0	0	0	- 1	0.00	10.99	76.20	12.81

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Institution ID: TD Bank NA

Table 15: Distribution of Deposit-taking ATM Delivery System

Distribution of ATM* Delivery System		Geography: Vermont				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017					
MA/Assessment Area:	Deposits	Deposit-taking ATMs						Population			
	% of Total Bank Deposits	#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies**				% of Population within Each Geography*			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Burlington MSA	46.85	24	57.14	0.00	41.67	37.50	20.83	1.44	19.36	60.34	18.86
Non-MSA Vermont	53.15	18	42.86	0.00	16.67	66.67	16.66	0.00	10.99	76.20	12.81

* ATM in this table refers solely to deposit-taking ATMs

** Distribution may not total 100% due to the location of ATMs in geographies without an income designation

* Based upon the evaluation period for the Retail Services portion of the Service Test, population distribution in Table 15 is based upon the 2015 ACS Census data and may not match the data found in Appendix C.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2014-16

Assessment Area:	Total Home Mortgage Loans				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg	% of Owner Occupied Housing Units	% Bank Loans	Agg
Burlington MSA	229	39,171	39.3	7,746	0.4	0.9	0.6	15.6	31.4	14.2	58.4	46.3	59.5	25.5	21.4	25.6	0.1	0.0	0.0
Non-MSA Vermont	354	54,858	60.7	7,726	0.1	0.3	0.0	14.8	13.0	14.0	70.8	67.5	68.8	14.3	19.2	17.1	0.0	0.0	0.0
Total	583	94,029	100.0	15,472	0.2	0.5	0.3	15.1	20.2	14.1	66.4	59.2	64.2	18.3	20.1	21.4	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2014-16**

Assessment Area:	Total Home Mortgage Loans				Low Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg	% Families	% Bank Loans	Agg
Burlington MSA	229	39,171	39.3	7,746	18.3	14.4	6.6	19.0	29.3	21.0	23.5	17.5	25.5	39.2	35.4	35.9	0.0	3.5	11.0
Non-MSA Vermont	354	54,858	60.7	7,726	19.5	9.9	4.9	18.9	21.8	14.5	22.6	17.8	21.6	39.0	49.4	45.6	0.0	1.1	13.4
Total	583	94,029	100.0	15,472	19.0	11.7	5.8	18.9	24.7	17.7	23.0	17.7	23.6	39.1	43.9	40.7	0.0	2.1	12.2

*Source: 2010 U.S. Census ; 01/01/2014 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2014-16

Assessment Area:	Total Loans to Small Businesses				Low Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg	% Bus	% Bank Loans	Agg
Burlington MSA	262	9,678	43.4	6,410	1.1	1.1	0.5	20.0	19.5	17.3	53.1	55.7	55.1	25.6	24.0	26.9	0.2	0.0	0.1
Non-MSA Vermont	342	11,239	56.6	6,931	0.2	0.0	0.1	18.5	11.1	14.8	64.7	65.8	67.1	16.6	23.1	18.0	0.0	0.0	0.0
Total	604	20,918	100.0	13,341	0.5	0.5	0.3	19.0	14.7	16.0	60.3	61.4	61.3	20.1	23.5	22.3	0.1	0.0	0.1

Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2014-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Burlington MSA	262	9,678	43.4	6,410	77.6	51.5	36.9	5.8	13.0	16.6	35.5
Non-MSA Vermont	342	11,239	56.6	6,931	77.4	52.6	43.7	5.4	12.3	17.2	35.1
Total	604	20,918	100.0	13,341	77.5	52.2	40.4	5.5	12.6	17.0	35.3

*Source: 2016 D&B Data; 01/01/2014 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Institution ID: TD Bank NA

Table 1. Lending Volume

LENDING VOLUME		Geography: REGIONAL AND STATEWIDE						Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Regional	100.00	0	0	0	0	0	0	18	206,536	18	206,536	0.00
Statewide Pennsylvania	100.00	0	0	0	0	0	0	5	151,260	5	151,260	0.00

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2014 to December 31, 2017.

*** Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TD Bank NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: REGIONAL AND STATEWIDE				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Regional	49	64,602	6	24,908	55	89,510	100.00	48	111,896
Statewide Pennsylvania	1	605	1	885	2	1,490	100.00	0	0
Statewide Rhode Island	0	0	1	146	1	146	100.00	0	0
Statewide Virginia	0	0	1	52	1	52	100.00	0	0
Designated Disaster Areas (Outside AAs)	0	0	4	225	4	225	100.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.