



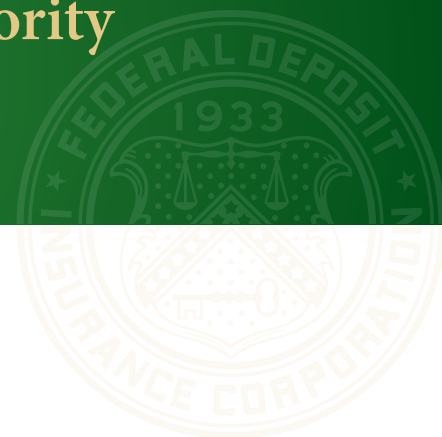
Preservation and Promotion of Minority Depository Institutions

Report to Congress for 2015



Preservation and Promotion of Minority Depository Institutions

The Federal Deposit Insurance Corporation Report to Congress for 2015



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

Introduction

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

Pursuant to Section 367 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, this report provides a summary profile of minority depository institutions (MDIs) as of the end of 2015; a description of the FDIC's MDI program; and detailed information on our 2015 initiatives supporting minority depository institutions. The FDIC defines an MDI as (1) any Federally insured depository institution where 51 percent or more of the voting stock is owned by minority individuals; or (2) where a majority of the Board of Directors is minority and the community that the institution serves is predominantly minority. Ownership must be by U.S. citizens or permanent legal U.S. residents to be counted in determining minority ownership. The FDIC's Policy Statement Regarding Minority Depository Institutions (see Attachment 1) provides additional information.

Summary Profile of Minority Depository Institutions

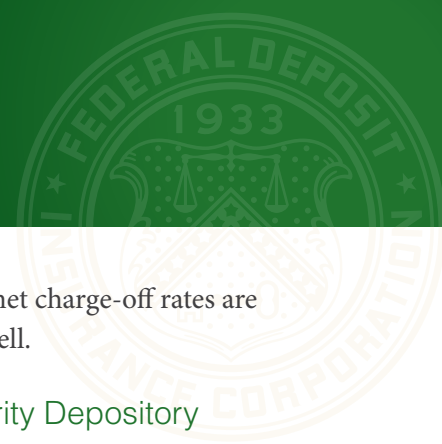
The FDIC maintains a list and tracks the insured MDIs it supervises, i.e., State chartered institutions which are not members of the Federal Reserve System, as well as MDIs that are supervised by the Office of the Comptroller of the Currency (OCC) and the Board of Governors of the Federal Reserve System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

Structure

As of December 31, 2015, FDIC-insured MDIs totaled 164 institutions with combined total assets of nearly \$197 billion. (See Attachment 2, List of Minority Depository Institutions as of December 31, 2015.)

At the beginning of 2015, there were 175 FDIC-insured MDIs with combined total assets of approximately \$186 billion. During the year, eight MDIs merged into or were acquired by other institutions and three MDIs were closed by their federal or State chartering authorities and entered into FDIC receivership. With respect to the eight mergers or acquisitions, four MDIs merged with or were acquired by other MDIs, preserving their minority character, while four of these transactions were with non-MDIs. Of the eight institutions merging or being acquired in 2015, five were Asian American MDIs, one was African American, one Native American, and one Hispanic American.

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



With respect to the failed institutions, all three (with \$359 million in combined total assets) were acquired by non-MDIs through purchase and assumption transactions arranged by the FDIC at failure, following FDIC efforts to market the institutions to other MDIs (see page 6 of this report). Of the failed MDIs, two were African American and one was Native American.

Of the total assets of institutions involved in 2015 MDI acquisitions, mergers or failures, more than half (\$868 million or 53 percent) remained in MDI institutions after the transactions.

Performance

As of December 31, 2015, the overall performance of FDIC-insured MDIs improved relative to 2014. Over 84 percent of MDIs were profitable in 2015, compared to more than 95 percent for all FDIC-insured institutions and all FDIC-insured community banks. However, overall MDI earnings were higher than all FDIC-insured institutions and all community banks as measured by return on assets (ROA). MDI ROA of 1.22 percent in 2015 was significantly higher than community banks overall at 1.00 percent and all insured financial institutions at 1.04 percent.

MDI industry performance, however, has been uneven. Generally, smaller MDIs and those serving low- and moderate-income communities continue to face great challenges, in part reflecting the continuing economic challenges faced by many of the communities they serve. The proportion of non-current assets at MDIs continued to decline to the lowest level since the second quarter of 2008, but still remains more than double the rate of community banks and all banks. MDIs have higher net interest margins overall than community banks

and all banks, but their net charge-off rates are significantly higher as well.

FDIC National Minority Depository Institutions Program

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

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



FDIC's National Director Robert W. Mooney convenes a panel of trade group representatives including the Community Development Bankers Association and the National Bankers Association at the 2015 National Community Investment Fund Development Banking Conference.

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

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

2015 Initiatives Supporting Minority Depository Institutions

In 2015, the FDIC continued to advocate for MDI and Community Development Financial Institution (CDFI bank) industry-led strategies for success. The FDIC encouraged institutions to build on the results of the 2013 Interagency MDI and CDFI Bank Conference and the FDIC's 2014 study on MDIs entitled *Minority Depository Institutions: Structure, Performance, and Social Impact*. These strategies include industry-led solutions; MDI and CDFI bankers working together to tell their story; collaborative approaches to partnerships to share costs, raise capital, or pool loans; technical assistance; and innovative use of federal programs.

In June 2015, the FDIC sponsored a roundtable in Salt Lake City, Utah, with three trade groups representing nearly 100 MDIs and CDFI banks

and approximately 20 representatives of potential bank partners to discuss Community Reinvestment Act (CRA) partnerships. The FDIC provided an overview of five CRA community development activities related to minority- and women-owned financial institutions. The trade groups outlined the community development needs of their members that might represent investment or partnership opportunities for the banks. The banks had the opportunity to engage in dialog with the MDI representatives. The trade groups and the banks agreed to continue to build upon these initial discussions following the roundtable.

The FDIC co-sponsored with the OCC and the Federal Reserve the 2015 Interagency MDI and CDFI Bank Conference, held over a three-day period in July. Nearly 110 bankers from 72 banks attended the conference, entitled *Celebrating 150 Years of Minority Depository Institutions: Changes, Challenges and Opportunities*.



FDIC Chairman Martin J. Gruenberg participates with Comptroller Thomas J. Curry and Federal Reserve Board Governor Lael Brainard in a panel moderated by Kelvin Boston.

The conference featured an interactive panel with FDIC Chairman Martin J. Gruenberg, Federal Reserve Governor Lael Brainard, and Comptroller of the Currency Thomas J. Curry, moderated by Kelvin Boston, host of Public Broadcasting Television's *Moneywise with Kelvin Boston*. Topics included the state of the MDI industry, strategies for collaboration, how MDIs and CDFI banks are



uniquely positioned to create positive change in their communities, and why they are so important.

Plenary sessions addressed emerging issues such as cybersecurity and capitalization strategies for mission oriented institutions.



FDIC's Director of Risk Management Supervision, Doreen Eberley, moderates a Cybersecurity panel featuring Art Lindo of the Board of Governors and Kevin Greenfield of the Office of the Comptroller of the Currency.

The capitalization panel featured two MDI CEOs, two equity investors and an executive search firm. The panel outlined the investor expectations with respect to capital raises, and how CEOs are repositioning their institutions to successfully raise capital. In addressing these issues, the panel discussed recent successful MDI capital raise transactions.



Robert W. Mooney moderates a panel of MDI CEOs and equity investors who outlined strategies for successful capital raises.

The conference featured a number of concurrent workshops with experts describing innovative Federal programs that might benefit MDIs. These included the Federal Home Loan Bank of Chicago's

Conduit Program for Government-Backed Securities; certifications and programs offered by the Department of the Treasury's Community Development Financial Institutions Fund; new Small Business Administration initiatives; and various programs assisting the financing of exporters and non-exporters in the supply chain, including those of the International Trade Administration, Minority Business Development Agency, and the Office of International Trade at the Department of Commerce.

Concurrent workshops also covered compliance updates, strategic planning for MDI and CDFI banks, and how MDIs and CDFI banks can attract, develop and retain bank management. Roundtables during the luncheon offered CEOs the opportunity to discuss topics such as interest rate risk, credit risk, compliance risk, operational risk, new capital rules, and attracting investments with technical experts from the FDIC, OCC and Federal Reserve. In addition, FDIC Chairman Gruenberg and Comptroller Curry met informally over breakfast with MDI and CDFI bankers to discuss topics of interest.



CDFI Fund staff discusses the CDFI certification process and other programs that can assist MDIs and CDFI banks.

The Director of the Federal Housing Finance Agency (FHFA), Melvin L. Watt and Don Graves, Deputy Assistant to the President of the United States and Counselor to the Vice President,

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discussed FHFA initiatives to improve access to credit and liquidity in the housing market. They also addressed small dollar securitization, credit scoring reforms, and pilot partnerships for neighborhood stabilization in Chicago and Detroit aimed at helping these communities recover from high foreclosure rates.



Mel Watt and Don Graves discuss programs to assist MDI and CDFI bankers.

The conference also focused on the unique role MDI and CDFI banks play in their communities. Workshop topics included trends in double bottom line banking, referring to companies that focus on measuring their social impact in addition to the conventional bottom line that measures fiscal performance. Additional workshop topics included: making banking more accessible; demographic shifts that will affect MDI and CDFI bank markets; and strategies mission-oriented banks can pursue to collaborate for economies of scale.

In November 2015, the FDIC sponsored a round table in Chicago, IL with approximately a dozen MDI CEOs to discuss strategies for MDIs to partner with non-MDI community banks. Community banks are well positioned to help MDIs because even those in close proximity often do not compete against one another and these banks, as well as larger banks, have valuable incentives under the Community Reinvestment

Act to undertake ventures with MDIs, including capital investment and loan participations. The MDI CEOs expressed an interest in pursuing possible collaborative opportunities to raise capital, explore loan participations and share back room operations.

Technical Assistance

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

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

In 2015, the FDIC provided 101 individual technical assistance sessions on approximately 50 risk management and compliance topics, including the following:



- » Accounting
- » Bank Secrecy Act and Anti-Money Laundering
- » Basel III Capital Rules
- » Brokered Deposits/Waivers
- » Capital Planning
- » Commercial Real Estate Concentrations
- » Community Reinvestment Act
- » Funding and Liquidity
- » Global Cash Flow
- » High Volatility Commercial Real Estate
- » Information Technology Risk Management and Security
- » Interest Rate Risk
- » Loan Underwriting and Administration
- » Qualified Mortgage Rules
- » Strategic Planning
- » Third-Party Risk Management

Outreach, Training and Educational Programs

The FDIC regional offices also held outreach, training and educational programs for MDIs through individual meetings, conference calls and banker roundtables. In 2015, topics of discussion for these sessions included many of those listed above, as well as cybersecurity, vendor management and the FDIC's Community Banking Initiative, including the Technical Assistance Videos.

Failing Institutions

In accordance with Section 308 and FDIC Policy, the FDIC seeks to preserve the minority character

of failing institutions before and during the resolution process. The FDIC provides ongoing supervisory oversight of troubled institutions, through regular onsite examinations, visitations and off-site monitoring, as well as through numerous offers of technical assistance.

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

As noted earlier, three FDIC-insured minority depository institutions failed in 2015 and in all three cases, the least cost bidder for the failed bank franchise was not an MDI. This experience was an anomaly, as the FDIC historically has been able to solicit sufficient MDI bidder interest to preserve the minority character in failures. Between 2002 and 2014, almost two-thirds of the assets of the merged institutions and about 87 percent of the assets of failed institutions remained with MDI acquirers.

Conclusion

Minority depository institutions typically promote the economic viability of minority and under-served communities, providing access to capital in their communities. The FDIC has long recognized the importance of MDIs in the financial system and takes steps to preserve and encourage minority ownership of insured financial institutions. MDI bankers provide valuable input and leadership to

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the FDIC, as active members of two FDIC Advisory Committees that inform FDIC priorities and policy: the Advisory Committee on Economic Inclusion and the Advisory Committee on Community Banking.

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

Attachments

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

Attachment 2: List of Minority Depository Institutions as of December 31, 2015



FDIC Law, Regulations, Related Acts

5000 - Statements of Policy

POLICY STATEMENT REGARDING MINORITY DEPOSITORY INSTITUTIONS

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

Statutory Framework

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

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

Definition

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

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

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Identification of Minority Depository Institutions

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

Organizational Structure

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

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

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



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

Technical Assistance

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

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

Training and Educational Programs

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

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

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

Failing Institutions

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

Reporting

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

Internet Site

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

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

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



MINORITY DEPOSITORY INSTITUTIONS (MDIs)

December 31, 2015

NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS	FDIC REGION	TOTAL ASSETS (EST.) (5000)
ALAMERICA BANK	BIRMINGHAM	AL	20000128	35314	NM	FDIC	B	Atlanta	35,476
COMMONWEALTH NATIONAL BANK	MOBILE	AL	19760219	22229	N	OCC	B	Atlanta	56,501
BAC FLORIDA BANK	CORAL GABLES	FL	19731012	21265	NM	FDIC	H	Atlanta	1,773,299
BANESCO USA	CORAL GABLES	FL	20060110	57815	NM	FDIC	H	Atlanta	942,576
CENTRAL BANK	TAMPA	FL	20070226	58377	NM	FDIC	A	Atlanta	112,329
CONTINENTAL NATIONAL BANK	MIAMI	FL	19740510	21578	N	OCC	H	Atlanta	412,818
EXECUTIVE NATIONAL BANK	MIAMI	FL	19720607	20711	N	OCC	H	Atlanta	337,067
INTERAMERICAN BANK A FSB	MIAMI	FL	19760823	31823	SB	OCC	H	Atlanta	209,668
INTERCONTINENTAL BANK	WEST MIAMI	FL	20020621	57214	NM	FDIC	H	Atlanta	155,960
INTERNATIONAL FINANCE BANK	MIAMI	FL	19831130	24823	NM	FDIC	H	Atlanta	318,213
OCEAN BANK	MIAMI	FL	19821209	24156	NM	FDIC	H	Atlanta	3,295,412
PLUS INTERNATIONAL BANK	MIAMI	FL	20010914	57083	NM	FDIC	H	Atlanta	103,451
SUNSTATE BANK	MIAMI	FL	19990315	34643	NM	FDIC	H	Atlanta	154,161
TOTALBANK	MIAMI	FL	19740305	21468	NM	FDIC	H	Atlanta	2,761,804
U S CENTURY BANK	DORAL	FL	20021028	57369	NM	FDIC	H	Atlanta	910,252
CARVER STATE BANK	SAVANNAH	GA	19270101	16584	NM	FDIC	B	Atlanta	42,174
CITIZENS TRUST BANK	ATLANTA	GA	19210618	8033	SM	FED	B	Atlanta	387,897
EMBASSY NATIONAL BANK	LAWRENCEVILLE	GA	20070305	58413	N	OCC	A	Atlanta	91,253

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MINORITY DEPOSITORY INSTITUTIONS (MDIs)

December 31, 2015

NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS	FDIC REGION	TOTAL ASSETS (EST.) (5000)
FIRST INTERCONTINENTAL BANK	DORAVILLE	GA	20000131	34998	NM	FDIC	A	Atlanta	286,636
METRO CITY BANK	DORAVILLE	GA	20060404	58181	NM	FDIC	A	Atlanta	672,777
NOA BANK	DULUTH	GA	20081106	58657	NM	FDIC	A	Atlanta	237,054
QUANTUM NATIONAL BANK	SUWANEE	GA	19951227	34110	N	OCC	A	Atlanta	366,710
STATE BANK OF GEORGIA	FAYETTEVILLE	GA	20071105	58599	NM	FDIC	M	Atlanta	68,403
TOUCHMARK NATIONAL BANK	ALPHARETTA	GA	20080128	58687	N	OCC	A	Atlanta	195,707
LUMBEE GUARANTY BANK	PEMBROKE	NC	19711222	20568	NM	FDIC	N	Atlanta	317,486
MECHANICS & FARMERS BANK	DURHAM	NC	19080301	12266	NM	FDIC	B	Atlanta	298,014
SOUTH CAROLINA CMTY BANK	COLUMBIA	SC	19990326	35241	NM	FDIC	B	Atlanta	52,995
FIRST STATE BANK	DANVILLE	VA	19190908	9502	NM	FDIC	B	Atlanta	37,612
OLD DOMINION NATIONAL BANK	NORTH GARDEN	VA	20070723	58504	N	OCC	A	Atlanta	47,260
AMERICAN METRO BANK	CHICAGO	IL	19970129	34334	NM	FDIC	A	Chicago	63,479
ILLINOIS-SERVICE FS&LA	CHICAGO	IL	19340101	29399	SB	OCC	B	Chicago	101,291
INTERNATIONAL BK OF CHICAGO	CHICAGO	IL	19921026	33708	NM	FDIC	A	Chicago	520,056
MILLENNIUM BANK	DES PLAINES	IL	20070702	58348	NM	FDIC	A	Chicago	80,028
PACIFIC GLOBAL BANK	CHICAGO	IL	19951109	34089	SM	FED	A	Chicago	170,608

Attachment 2: List of Minority Depository Institutions as of December 31, 2015



MINORITY DEPOSITORY INSTITUTIONS (MDIs)

December 31, 2015

NAME	CITY	STATE	EST. DATE	CERT	CLASS	REGULATOR	MINORITY STATUS	FDIC REGION	TOTAL ASSETS (EST.) (5000)
SEAWAY BANK&TRUST CO	CHICAGO	IL	19650102	19328	NM	FDIC	B	Chicago	369,444
URBAN PARTNERSHIP BANK	CHICAGO	IL	20100819	59051	NM	FDIC	B	Chicago	635,792
METRO BANK	LOUISVILLE	KY	19970106	34308	NM	FDIC	B	Chicago	30,990
FIRST INDEPENDENCE BANK	DETROIT	MI	19700514	20179	NM	FDIC	B	Chicago	216,821
BAY BANK	GREEN BAY	WI	19950821	34052	NM	FDIC	N	Chicago	81,021
COLUMBIA SAVINGS & LOAN ASSN	MILWAUKEE	WI	19240101	28480	SL	FDIC	B	Chicago	23,684
NORTH MILWAUKEE STATE BANK	MILWAUKEE	WI	19710212	20364	NM	FDIC	B	Chicago	67,115
NATIVE AMERICAN BANK NA	DENVER	CO	19870727	27026	N	OCC	N	Dallas	77,145
LIBERTY BANK & TRUST CO	NEW ORLEANS	LA	19721116	20856	NM	FDIC	B	Dallas	604,163
CENTINEL BANK OF TAOS	TAOS	NM	19690301	19904	NM	FDIC	H	Dallas	210,129
MY BANK	BELEN	NM	19920701	33616	SM	FED	H	Dallas	165,202
ALLNATIONS BANK	CALUMET	OK	19010101	4051	SM	FED	N	Dallas	48,775
BANK 2	OKLAHOMA CITY	OK	19030101	11521	SM	FED	N	Dallas	125,111
BANK OF CHEROKEE COUNTY	HULBERT	OK	19081201	2327	SM	FED	N	Dallas	107,505
BANK OF COMMERCE	STILWELL	OK	19310101	422	NM	FDIC	N	Dallas	88,962
BANK OF GROVE	GROVE	OK	20050609	57915	NM	FDIC	H	Dallas	146,568
F&M BANK	EDMOND	OK	19020101	12761	NM	FDIC	N	Dallas	377,750

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FIRST NATIONAL BANK & TRUST CO	SHAWNEE	OK	19841029	25738	N	OCC	N	Dallas	252,018
FIRSTBANK	ANTLERS	OK	19010101	14331	SM	FED	N	Dallas	294,021
FORT GIBSON STATE BANK	FORT GIBSON	OK	19730521	21090	NM	FDIC	N	Dallas	66,846
OKLAHOMA STATE BANK	VINITA	OK	19380713	15611	NM	FDIC	N	Dallas	133,913
PEOPLES BANK	WESTVILLE	OK	19030203	2320	NM	FDIC	N	Dallas	47,209
CITIZENS SAVINGS B&T CO	NASHVILLE	TN	19040104	10319	NM	FDIC	B	Dallas	104,060
TRI-STATE BANK OF MEMPHIS	MEMPHIS	TN	19461216	16511	NM	FDIC	B	Dallas	111,042
AMERICAN FIRST NATIONAL BANK	HOUSTON	TX	19980518	34656	N	OCC	A	Dallas	1,166,546
BANK OF SOUTH TEXAS	MCALLEN	TX	19860708	26727	NM	FDIC	H	Dallas	108,780
CITIZENS STATE BANK	ROMA	TX	19780515	22657	NM	FDIC	H	Dallas	83,573
COMMERCE BANK	LAREDO	TX	19820331	23772	NM	FDIC	H	Dallas	563,424
FALCON INTERNATIONAL BANK	LAREDO	TX	19861210	26856	NM	FDIC	H	Dallas	975,274
FIRST STATE BANK	SHALLOWATER	TX	19601008	18301	NM	FDIC	A	Dallas	87,448
GOLDEN BANK NATIONAL ASSN	HOUSTON	TX	19850503	26223	N	OCC	A	Dallas	621,969
GREATER STATE BANK	FALFURRIAS	TX	19740101	31762	NM	FDIC	H	Dallas	66,910
INTERNATIONAL BK OF COM	LAREDO	TX	19660902	19629	NM	FDIC	H	Dallas	9,632,973

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INTERNATIONAL BK OF COM	ZAPATA	TX	19840206	24961	NM	FDIC	H	Dallas	506,861
INTERNATIONAL BK OF COM	BROWNSVILLE	TX	19841009	25679	NM	FDIC	H	Dallas	1,026,133
LONE STAR NATIONAL BANK	PHARR	TX	19830124	24347	N	OCC	H	Dallas	2,193,398
ONE WORLD BANK	DALLAS	TX	20050404	57901	NM	FDIC	A	Dallas	78,807
RIO BANK	MCALLEN	TX	19850211	25886	NM	FDIC	H	Dallas	273,800
SOUTHWESTERN NATIONAL BANK	HOUSTON	TX	19971103	34319	N	OCC	A	Dallas	349,800
STATE BANK OF TEXAS	DALLAS	TX	19871019	27074	NM	FDIC	A	Dallas	660,004
TEXAS NATIONAL BANK	MERCEDES	TX	19201126	3337	N	OCC	H	Dallas	190,836
UNITED BK EL PASO DEL NORTE	EL PASO	TX	20010501	57119	SM	FED	H	Dallas	214,526
UNITY NB OF HOUSTON	HOUSTON	TX	19850801	26351	N	OCC	B	Dallas	83,327
WALLIS STATE BANK	WALLIS	TX	19721028	20845	NM	FDIC	A	Dallas	447,608
ZAPATA NATIONAL BANK	ZAPATA	TX	19611116	18454	N	OCC	H	Dallas	90,294
PINNACLE BANK	MARSHALLTOWN	IA	19270505	252	SM	FED	N	Kansas City	178,298
CBW BANK	WEIR	KS	18920101	13959	NM	FDIC	A	Kansas City	22,659
WOODLANDS NATIONAL BANK	HINCKLEY	MN	19081001	1417	N	OCC	N	Kansas City	159,686
PEOPLES BANK OF SENECA	SENECA	MO	19960315	34146	NM	FDIC	N	Kansas City	149,252
TURTLE MOUNTAIN STATE BANK	BELCOURT	ND	20071203	58586	NM	FDIC	N	Kansas City	31,491

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INDUSTRIAL BANK	WASHINGTON	DC	19340818	14679	NM	FDIC	B	New York	388,951
LEADER BANK NATIONAL ASSN	ARLINGTON	MA	20020508	57134	N	OCC	A	New York	976,670
ONEUNITED BANK	BOSTON	MA	19820802	23966	NM	FDIC	B	New York	648,615
HARBOR BANK OF MARYLAND	BALTIMORE	MD	19820913	24015	NM	FDIC	B	New York	285,246
BNB HANA BANK NATIONAL ASSN	FORT LEE	NJ	19860916	26790	N	OCC	A	New York	236,755
CITY NB OF NEW JERSEY	NEWARK	NJ	19730611	21111	N	OCC	B	New York	250,095
INDUS AMERICAN BANK	ISELIN	NJ	20051212	57983	NM	FDIC	A	New York	246,642
NEW MILLENNIUM BANK	NEW BRUNSWICK	NJ	19990719	35151	NM	FDIC	A	New York	242,558
ABACUS FEDERAL SAVINGS BANK	NEW YORK	NY	19841129	32257	SB	OCC	A	New York	241,431
AMERASIA BANK	FLUSHING	NY	19880620	27267	NM	FDIC	A	New York	467,644
BANCO POPULAR NORTH AMERICA	NEW YORK	NY	19990102	34967	SM	FED	H	New York	7,780,002
CARVER FEDERAL SAVINGS BANK	NEW YORK	NY	19480101	30394	SB	OCC	B	New York	754,566
CHINATOWN FSB	NEW YORK	NY	19840427	32209	SB	OCC	A	New York	138,450
EASTBANK NATIONAL ASSN	NEW YORK	NY	19841126	25749	N	OCC	A	New York	198,146
FIRST AMERICAN INTL BANK	BROOKLYN	NY	19991115	35186	NM	FDIC	A	New York	642,475
GLOBAL BANK	NEW YORK	NY	20070312	58263	NM	FDIC	A	New York	144,405
NEW BANK	FLUSHING	NY	20060929	58203	NM	FDIC	A	New York	261,964

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PONCE DE LEON FEDERAL BANK	BRONX	NY	19600331	31189	SB	OCC	H	New York	703,157
UNITED ORIENT BANK	NEW YORK	NY	19810409	23373	NM	FDIC	A	New York	100,619
ASIAN BANK	PHILADELPHIA	PA	19990609	34759	SM	FED	A	New York	134,655
NOAH BANK	ELKINS PARK	PA	20060717	58196	NM	FDIC	A	New York	311,026
UNITED BANK OF PHILADELPHIA	PHILADELPHIA	PA	19920323	33568	NM	FDIC	B	New York	59,001
BANCO POPULAR DE PUERTO RICO	HATO REY	PR	19990102	34968	SM	FED	H	New York	27,750,000
BANCO SANTANDER PUERTO RICO	SAN JUAN	PR	19721002	20828	NM	FDIC	H	New York	5,344,040
FIRSTBANK PUERTO RICO	SANTURCE	PR	19490117	30387	NM	FDIC	H	New York	12,556,537
ORIENTAL BANK	SAN JUAN	PR	19650325	31469	NM	FDIC	H	New York	7,055,071
SCOTIABANK DE PUERTO RICO	SAN JUAN	PR	19790907	22946	NM	FDIC	H	New York	4,619,161
AMERICAN CONTINENTAL BANK	CITY OF INDUSTRY	CA	20031006	57444	NM	FDIC	A	San Francisco	198,612
AMERICAN PLUS BANK N A	ARCADIA	CA	20070808	58469	N	OCC	A	San Francisco	392,083
AMERICAS UNITED BANK	GLENDALE	CA	20061106	58360	NM	FDIC	H	San Francisco	219,911
ASIAN PACIFIC NATIONAL BANK	SAN GABRIEL	CA	19900725	33013	N	OCC	A	San Francisco	57,573
BANK OF THE ORIENT	SAN FRANCISCO	CA	19710317	20387	SM	FED	A	San Francisco	483,793
BANK OF WHITTIER NA	WHITTIER	CA	19821220	24211	N	OCC	A	San Francisco	59,823

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GATEWAY BANK FSB	OAKLAND	CA	19900608	33103	SB	OCC	A	San Francisco	137,143
HANMI BANK	LOS ANGELES	CA	19821215	24170	SM	FED	A	San Francisco	4,228,996
MEGA BANK	SAN GABRIEL	CA	20080205	58401	NM	FDIC	A	San Francisco	294,402
METROPOLITAN BANK	OAKLAND	CA	19830901	25869	NM	FDIC	A	San Francisco	147,209
MISSION NATIONAL BANK	SAN FRANCISCO	CA	19820216	23749	N	OCC	A	San Francisco	208,843
NEW OMNI BANK NATIONAL ASSN	ALHAMBRA	CA	19800212	23086	N	OCC	A	San Francisco	367,149
OPEN BANK	LOS ANGELES	CA	20050610	57944	NM	FDIC	A	San Francisco	618,718
PACIFIC ALLIANCE BANK	ROSEMEAD	CA	20061227	58234	NM	FDIC	A	San Francisco	255,977
PACIFIC CITY BANK	LOS ANGELES	CA	20030918	57463	NM	FDIC	A	San Francisco	1,042,509
PACIFIC COMMERCE BANK	LOS ANGELES	CA	20021010	57065	SM	FED	A	San Francisco	353,290
PAN AMERICAN BANK	LOS ANGELES	CA	19710701	20448	NM	FDIC	H	San Francisco	162,385
PREFERRED BANK	LOS ANGELES	CA	19911223	33539	NM	FDIC	A	San Francisco	2,601,787
PREMIER BUSINESS BANK	LOS ANGELES	CA	20060725	58261	NM	FDIC	A	San Francisco	275,047
PROAMERICA BANK	LOS ANGELES	CA	20061107	58349	NM	FDIC	H	San Francisco	183,617
ROYAL BUSINESS BANK	LOS ANGELES	CA	20081118	58816	NM	FDIC	A	San Francisco	1,021,311

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BBCN BANK	LOS ANGELES	CA	19860318	26610	NM	FDIC	A	San Francisco	7,910,324
BROADWAY FEDERAL BANK FSB	LOS ANGELES	CA	19470226	30306	SB	OCC	B	San Francisco	402,902
CALIFORNIA BUSINESS BANK	LOS ANGELES	CA	20051101	58037	NM	FDIC	A	San Francisco	80,502
CALIFORNIA PACIFIC BANK	SAN FRANCISCO	CA	19801016	23242	NM	FDIC	A	San Francisco	93,339
CATHAY BANK	LOS ANGELES	CA	19620419	18503	NM	FDIC	A	San Francisco	13,219,796
COMMERCIAL BANK OF CA	IRVINE	CA	20030515	57417	NM	FDIC	H	San Francisco	328,415
COMMUNITY COMMERCE BANK	CLAREMONT	CA	19761001	26363	NM	FDIC	H	San Francisco	180,664
CTBC BANK CORP USA	LOS ANGELES	CA	19650427	19416	NM	FDIC	A	San Francisco	2,831,167
CWBB	LOS ANGELES	CA	20050303	57873	SM	FED	A	San Francisco	786,423
EAST WEST BANK	PASADENA	CA	19720101	31628	SM	FED	A	San Francisco	32,243,782
EASTERN INTERNATIONAL BANK	LOS ANGELES	CA	19850226	32277	NM	FDIC	A	San Francisco	119,493
EVERTRUST BANK	PASADENA	CA	19950503	34010	NM	FDIC	A	San Francisco	806,954
FIRST CHOICE BANK	CERRITOS	CA	20050818	57966	NM	FDIC	A	San Francisco	812,086
FIRST COMMERCIAL BANK USA	ALHAMBRA	CA	19970520	34496	NM	FDIC	A	San Francisco	489,268
FIRST GENERAL BANK	ROWLAND HEIGHTS	CA	20051013	58060	NM	FDIC	A	San Francisco	720,597

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SAIGON NATIONAL BANK	WESTMINSTER	CA	20051130	57974	N	OCC	A	San Francisco	50,440
STATE BANK OF INDIA CA	LOS ANGELES	CA	19820903	23998	NM	FDIC	A	San Francisco	694,736
TOMATOBANK	ALHAMBRA	CA	20000929	35474	SM	FED	A	San Francisco	472,440
UNITED PACIFIC BANK	CITY OF INDUSTRY	CA	19820511	23805	NM	FDIC	A	San Francisco	111,467
UNITI BANK	BUENA PARK	CA	20011217	57120	NM	FDIC	A	San Francisco	232,430
UNIVERSAL BANK	WEST COVINA	CA	19541117	30722	SB	OCC	A	San Francisco	337,295
US METRO BANK	GARDEN GROVE	CA	20060915	58310	NM	FDIC	A	San Francisco	154,530
WILSHIRE BANK	LOS ANGELES	CA	19801230	23301	NM	FDIC	A	San Francisco	4,706,997
ANZ GUAM INC	HAGATNA	GU	19910111	33316	NM	FDIC	A	San Francisco	348,299
BANK OF GUAM	HAGATNA	GU	19721211	20884	NM	FDIC	A	San Francisco	1,544,953
BANKPACIFIC LTD	HAGATNA	GU	19530101	30692	SL	FDIC	A	San Francisco	130,515
FINANCE FACTORS LTD	HONOLULU	HI	19520514	25158	NM	FDIC	A	San Francisco	527,022
HAWAII NATIONAL BANK	HONOLULU	HI	19600916	18296	N	OCC	A	San Francisco	636,191
OHANA BANK	HONOLULU	HI	20060601	58231	NM	FDIC	A	San Francisco	120,498
EAGLE BANK	POLSON	MT	20060725	58282	NM	FDIC	N	San Francisco	53,666

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PLAZA BANK	SEATTLE	WA	20060607	58305	NM	FDIC	H	San Francisco	70,678
UNIBANK	LYNNWOOD	WA	20061101	58407	NM	FDIC	A	San Francisco	278,408
TOTAL			COUNT	164					197,309,727
				<u>COUNT</u>	<u>MINORITY STATUS</u>				
				25	B - Black or African American				
				41	H - Hispanic American				
				79	A - Asian or Pacific Islander American				
				18	N - Native American or Alaskan Native American				
				1	M - Multi-racial American				
				<u>CLASS</u>	<u>DEFINITIONS OF CLASS TYPES</u>				
				107	NM - State bank, not a member of the Federal Reserve				
				18	SM - State bank, member of the Federal Reserve				
				28	N - National bank				
				2	SL - State or Federal savings and loan association				
				9	SB - State or Federal savings bank				
				<u>REGULATOR</u>					
				109	FDIC - Federal Deposit Insurance Corporation				
				37	OCC - Office of the Comptroller of the Currency				
				18	FED - Federal Reserve				

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