

CRA Public File

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Public Comments

Written comments relating to the bank's performance in meeting community credit needs received from the public for the current year and two prior years.

2021 – No comments

Federal Reserve Bank
[REDACTED]

Petition To Downgrade CRA Rating Complaint

July 24, 2023

The [REDACTED] ([REDACTED]'s Claimant) files the Petition To Downgrade Complaint against **Comerica Bank**. The [REDACTED] is the chief Complainant in the banking complaints filed with the **FRB** that outlined where **Comerica Bank** is engaged in practices, actions (and non-actions) and policies that result in the disparate impact and in the disproportionate discriminate effect and in the illegal discrimination and denial of the full enjoyment of Equal rights of access to capital, lending and banking services perpetrated against the protected class of black Americans and in redlining of whole black American Neighborhoods in the specified Zip Codes in Houston and in Dallas.

The [REDACTED] has filed new CRA Protest Complaints with the **FRB** against **Comerica Bank** for the correction, fixing and ending of the continuing injustices suffered by the aggrieved parties – the protected class of black Americans.

This Letter is to petition the **FRB** for the **Downgrade** of the CRA Rating of **Comerica Bank** to “**Needs To Improve**” and to impose Agency enforcement actions for the reclamation of rights denied to the protected class of black Americans by the practices, actions (and non-actions) and policies of **Comerica Bank**.

It is axiomatic that the Bank up for CRA Examination is not entitled for automatic renewal of its CRA Rating – especially where the Agency receives Complaints that outline Illegal Discrimination Claims and violations of the banking laws.

The high standards that the **FRB** has set – and that the Bank was well aware of – must be maintained as this goes to the heart of the integrity of the banking system – the Bank has a continuing duty to be in and remain in full compliance with all of the components of the banking laws in their entirety and in their full and final perfection.

Indeed, it is not in the best interest of society and nor of the communities in which the banks serve for the Bank to do anything less. It is not in the public interest for the **FRB** to do anything less than to aggressively enforce the banking laws to assure that the Banks named in the Complaints are in full compliance with all of the banking laws in their entirety and in their full and final perfection.

The operative phrase in this proceeding is “in full compliance” with the banking laws - and with the other applicable rulings and laws as well. To this end this is the legal standard in which to make the determination of whether the CRA Rating of **Comerica Bank is to be downgraded**

The **FRB** – in the person of General Counsel – has assured US Senator John Cornyn that the “FRB enforces the ECOA and the FHA in their entirety” -pursuant to a Complaint filed by the [REDACTED] with the Senators office against the FRB.

This statement is critical to the investigation into this **Downgrade Complaint** filed by the [REDACTED]

The **FRB** is bound by its duties to faithfully execute its sworn duties of supervision and to faithfully execute its sworn duties of enforcement of the banking laws in their entirety and in the laws’ full and final perfection

Comerica Bank is bound by its sworn duties and responsibilities to fulfill the components of the banking laws in their entirety and in their full and final perfection -and to discharge its responsibilities to be in full compliance with all the components of all the banking laws in their entirety

-the Bank does not get to pick and choose which of the banking laws it is going to abide by and which it is going to ignore – to this end **Comerica Bank**

-does not get to pick and choose which Neighborhoods are to receive the Bank investments for the full enjoyment of rights in banking and which Neighborhoods are to be denied – especially on the prohibited basis of race and Zip Codes

-does not get to pick and choose which Neighborhoods are to receive the favored advantages of bank branches – bricks and mortar free-standing edifices – Bank Financed Developments – stores, restaurants, office towers, office buildings, apartment complexes and luxury Mixed Use Developments and Community Development Loans for the stabilization and revitalization of the Neighborhoods – of the more than 60 Bank branches in Houston MSA **Comerica Bank** has placed only 2 branches inside of the black American Neighborhoods -as the other **Comerica Bank** branches are on the periphery. This is a worse per capita bank branch placement ration than in the landmark case of US V Chevy Chase FSB – and is certainly deserving of Agency enforcement actions

-does not get to pick and choose which Neighborhoods are to be the beneficiary of the full range of the Banks’ lending and credit products and which Neighborhoods are to be denied – to include business lending – especially in Working Capital and Bridge Loans. Mortgages – to include the most favored mortgages and home equity lending – both in geographical distribution and in dollar amounts **Comerica Bank** lending presence is all but invisible in the black American Neighborhoods in Houston. **Comerica Bank** and has engaged in practices of “failing to market residential real estate loan products to African-Americans” – and its “actions resulted in a lack of market penetration in African American communities” and such practices, actions (and non-actions) and policies violate **Section 805 of the Fair Housing Act**. This is the controlling authority in the Court holding in US V Midland States Bancorp.

-does not get to pick and choose which Neighborhoods are to be the beneficiary of the investments in Community Outreach – to include product development, marketing. Sponsorship of Neighborhood Events, capitalized CRA Partnerships, capitalized Neighborhood Group Alliances and College Scholarships - and which Neighborhoods are to be denied these favored services. **Comerica Bank** has failed to make any Community Outreach investments in the black American Neighborhoods that have made any material difference in any of the lives of the protected class of black Americans in the black American Neighborhoods in the specified Zip Codes in Houston – in the same way that the Bank has made the Community Outreach investments in the Anglo Neighborhoods in Houston.

-does not get to pick and choose which Media outlets – newspapers, radio and TV – to make the investments in advertising and marketing – to include annual advertising contracts – and which Media outlets it gets to ignore – **Comerica Bank** has failed to make the Equal per capita investments in advertising to market the full range of all of the Banks' lending and credit products – to include “failing to market residential real estate loan products to African Americans...” US V Midland States Bancorp.

-does not get to pick and choose which Organizations and Non-Profit Corporations are to receive the Charitable Contributions that make a material difference in the lives of the residents – and which Organizations and Non-Profits are to be denied – Prosperity Bank is virtually invisible in the black American Neighborhoods.

AS stated earlier the legal standard in which to make the determinations to Downgrade the CRA Rating of **Comerica Bank** are whether the Bank is in **full compliance** with all the components of the banking laws – in their **entirety** and in their full and final perfection – to include

-Community Reinvestment Act, Equal Credit Opportunity Act, Fair Housing Act – to include the Final Rule, Home Mortgage Disclosure Act, Fair Lending Laws, FTC Act _ Section 5, Regulation B/C

-whether **Comerica Bank** is in **full compliance** with all the components of the controlling authority of the applicable Court cases –in their **entirety** to include

-US V Hudson City Savings Bank (ECOA, FHA) US V Chevy Chase FSB (ECOA FHA), US V Midland States Bancorp (ECOA FHA), US V Hudson City Savings Bank, US V 1st American Bank (CRA, ECOA) TDHCA V ICP, Inc. – US Supreme Court case that codified the FHA Final Rule – Bank liability can be brought for practices that result in the disparate impact on protected classes)

-whether **Comerica Bank** is in **full compliance** with all the components of the Department Rules (HUD) – the Fair Housing Act Final Rule – in its **entirety** and in its full and final perfection – it is this banking law that **Comerica Bank** has consistently ignored and has refused to abide by – the FHA Final Rule shifts the burden of proof and

governs the Banks' answer to the Complaint – and states clearly that pursuant to the challenges in the Complaint the Bank is

-to provide the legally sufficient justification to prove that the practices challenged in the Complaint are necessary to achieve one or more of the Banks legitimate substantial nondiscriminatory interests

-as the FHA Final Rule allows for no exceptions, waivers or conditions the Bank either meets its duties under the FHA Final Rule or the Bank does not – no “convoluted rationale” will suffice.

EXAMPLE –

The Illegal Discrimination Claim in the Complaint states that **Comerica Bank** is engaged in the practice of placing its Bank branches **outside** of the black American Neighborhoods which denies Equal access to banking services and “locating its branches and services in a manner that did not give equal access based on race and national origin” - US V Midland States Bancorp. This practice is in violation of the ECOA and of the FHA.

Comerica Banks' duties under the FHA Final Rule calls for more than a simple denial of the Claim

Where **Comerica Bank** fails to provide the legally sufficient justification to prove that this practice is necessary to achieve one or more of the Banks legitimate substantial nondiscriminatory interests – the **Illegal Discrimination Claim** stands.

The FHA Final Rule states that the legally sufficient justification must be supported by evidence and cannot be speculative or hypothetical – where **Comerica Bank** fails to provide the supporting evidence the Illegal Discrimination Claim stands.

Pursuant to its duties of faithful execution of sworn duties of supervision and faithful execution of enforcement of the banking laws in their entirety the **FRB** is obliged to certify the finding of liability and to impose the enforcement action to correct this violation of the banking laws and to make the black American Neighborhoods whole.

Since the Complaint is filed under the Fair Housing Act the enforcement actions are to be remedial and robust and to make for the full reclamation of rights – to place the protected class of black Americans in the position they would have been in if not for the illegal discrimination and denial of Equal rights under the Fair Housing Act and Equal Credit Opportunity Act.

Where the **FRB** CRA Examination does not find that **Comerica Bank** is in **full compliance** with all the components of all the banking laws in their entirety and in the laws full and final perfection the CRA Rating of **Comerica Bank** is to be downgraded to Needs to Improve

The [REDACTED] petitions that

-the CRA Rating of **Comerica Bank** be downgraded to “Needs to Improv

-that **Comerica Bank** be barred from submitting any Bank Applications – expansionary or otherwise to the **FRB** until such time the Bank is in full compliance with all the banking laws in their entirety and in their full and final perfection.

-that minimum Fines of \$500 Million Dollars be imposed on **Comerica Bank**

-that Cease-and-Desist Orders be imposed on **Comerica Bank**

-that Removal Orders be imposed on the principals of **Comerica Bank** – as the Bank has flagrantly flouted the banking laws and has no intention of correcting, fixing, and ending the continuing Bank practices that result in the disparate impact, disproportionate discriminate effect, illegal discrimination and redlining perpetrated against the individuals, households, and businesses

-that the above enforcement actions be maintained against **Comerica Bank** until such time that **Comerica Bank** gets in full compliance with all the banking laws in their entirety and in their full and final perfection -and takes concrete actions and makes the capital investments in the following banking categories presently “missing” inside the black American Neighborhoods in the specified Zip Codes in Houston

-the building and placement of Equal Bank branches per capita– brick and mortar free-standing edifices - inside of the black American Neighborhoods, Bank Financed Developments – stores, office towers, apartment complexes, restaurants, Community Development Loans – to stabilize and to revitalize the black American Neighborhoods – as Apprenticeship Facilities, Computer Learning Centers and Neighborhood Centers

-establishes a Capital Fund of a minimum \$500 Million Dollars for business lending, mortgages and home equity lending at subsidized rates, with heavy promotion and marketing and with all **Discretionary Accommodations** for approval – for the individuals, households and businesses inside of the black American Neighborhoods in the specified Zip Codes in Houston MSA

- establishes a Community Outreach fund of a minimum \$100 Million Dollars – to include product development, marketing, Sponsorship of Neighborhood Events, capitalized CRA Partnerships, capitalized Neighborhood Group Alliances, 100 College Scholarships

-establishes a minimum Charitable Contributions Fund of \$10 Million Dollars – to underwrite Capital Charity Galas and initiate Capital Campaigns for the black American Organizations and Non-Profit Corporations and to sponsor Neighborhood Events

AS **Comerica Bank** has been invisible in the black American Neighborhoods, has denied the black American Neighborhoods the rights of Bank branches and banking services has failed to promote, market and to make the Equal lending in the full range of

the Banks' lending and credit products and has engaged in Bank practices that are systemic, pervasive and continuing that are in violation of the banking laws , that are inconsistent with the controlling authority of the Court case holdings , that violate the Civil Rights las – Title VIII -1968 Civil Rights Act ad deny the Constitutional rights Equal Protection pursuant to the 14th Amendment – United States Constitution.

AS the **FRB** has stated to the United States Senate and Congress that the Agency enforces the banking laws – to include the CRA, ECOA, HMDA and FHA – to include the Final Rule the Bank in this proceeding – **Comerica Bank** – is either in full compliance with all the components of all the banking laws in their entirety and in their full and final perfection or the Bank is not.

Pursuant to the law there are no exceptions, caveats or convoluted rationales as escape hatch for the allegations outlined in the Complaint.

Where **Comerica Bank** fails to meet all the requirements that places the Bank in full compliance with all the components of all the banking laws, controlling authority of the Court case rulings, Department Rules, Civil Rights laws and the Equal Protection Clause -14th Amendment – United States Constitution – as outlined – in their entirety and in their full and final perfection -and cannot provide the supporting evidence to uphold the Banks position

-the Illegal Discrimination Claims stands

The **FRB** is then legally bound to certify the Illegal Discrimination Claims, to impose the robust and remedial enforcement actions and to downgrade **Comerica Banks'** CRA Rating to "Needs To Improve".

In The Relentless Pursuit of Justice,

[REDACTED]
[REDACTED] – [REDACTED]
[REDACTED]
[REDACTED]



BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
WASHINGTON, DC 20551

August 22, 2023

Mr. [REDACTED]
Chairman

[REDACTED]

Dear [REDACTED]

The Board of Governors of the Federal Reserve System (“Board”) has approved the application by Comerica Bank, Dallas, Texas, to establish a branch at 4145 South Cooper Street, Arlington, Texas, pursuant to section 9 of the Federal Reserve Act.

In taking this action, the Board considered your comments on the application. The Board’s reasons for its action are explained in the enclosed order.

Under the Board’s Rules of Procedure (12 CFR part 262), you may request that the Board reconsider its action in this matter in accordance with section 262.3(k) of these rules, a copy of which is attached for your information. Please note that the rules provide that any such request must be made in writing, and I must receive it on or before the fifteenth calendar day after the effective date of the enclosed order.

Sincerely yours,

[REDACTED]

Ann E. Misback
Secretary of the Board

Enclosures: 1. Press Release
2. Order
3. Rules of Procedure

cc: [REDACTED]
Comerica Bank

CFPB

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Enforcement

July 27, 2023

RE: Banking Complaint Illegal Discrimination Claims–Comerica Bank

This letter is part of the continuing communications between the Consumer Financial Protection Bureau (The Bureau) and the [REDACTED] ([REDACTED] Claimant) and forms the banking Complaint. Please find the **Illegal Discrimination Claims** (IDC) as part of the banking Complaint against **Comerica Bank**. We file this banking Complaint under the new **Combatting Redlining Initiative** -from the Department of Justice Civil Rights.

The [REDACTED] respectfully petitions that **The Bureau** issue the Agency Directive to **Comerica Bank** to answer the **Illegal Discrimination Claims** directly, completely, truthfully and honestly – and that the THE BUREAU execute its sworn duty and issues the Agency Directive to **Comerica Bank** to abide by the **FHA Final Rule** – to provide the legally sufficient justification to prove that the practices challenged in the Complaint are necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests. Where the Bank fails in this burden shifting duty the **Illegal Discrimination Claim(s) stands.**

Even where the Bank meets this burden the Claimant can still prevail by proving that the legitimate substantial nondiscriminatory interest that the Bank is bound by can be achieved by another practice with a less discriminatory effect on the protected class of black Americans.

Neither The **Bureau** nor **Comerica Bank** has the right to **ignore** the FHA Final Rule – or any of the banking laws in this CRA Protest Proceeding.

Where **Comerica Bank** fails in this duty – for whatever reason – the Illegal Discrimination Claims stands – and the Agency is duty bound to certify the Claim and to impose the Agency enforcement actions on **Comerica Bank**.

Where The Bureau **fails or refuses** to impose and to enforce the **FHA Final Rule** – and the other banking laws – in this Complaint – please send the Complaint back and do not go forward with it- as there would be no point in going forward without the full Agency enforcement of all of the components of the FHA Final Rule in the laws' entirety and in the laws' full and final perfection. This continued failing and refusal of the BUREAU to enforce the FHA Final Rule in the laws entirety denies the full Due Process of the honest enforcement that the Claimant is entitled to – and worse, enables the Bank to continue its practices, patterns , policies, actions (and non-actions) that result in the

illegal discrimination perpetrated against the protected class of black American and the continued redlining of whole black American Neighborhoods in the specified Zip Codes in Houston.

The [REDACTED] will need the petition to enforce the FHA Final Rule answered before sending the Complaint to **Comerica Bank** is legally bound by the duties under the FHA Final Rule to provide the legally sufficient justification per Illegal Discrimination Claim.

The CRA Protest Complaint is filed under the banking laws

-Community Reinvestment Act -Equal Credit Opportunity Act, Fair Housing Act – to include the Final Rule, Home Mortgage Disclosure Act, Fair Lending Laws, FTC Act – Section 5, Regulation B/ C

-under the controlling authority of the applicable Court rulings – US V Chevy Chase FSB, US V Hudson City Savings Bank, US V 1st American Bank, US V Midland States Bancorp and TDHCA V ICP, Inc (Supreme Court case codifying the FHA Final Rule)

-under the Civil Rights laws – Title VIII – 1968 Civil Rights Act

-under the Department rules the HUD Fair Housing Act Final Rule p- and US V Midland States Bancorp

-under the Constitutional laws – Equal Protection Clause – 14th Amendment -United States Constitution

Pursuant to the **FHA Final Rule** the prima facie case for illegal discrimination is established. The Complainant and the Complaint establishes that the Bank practices, policies, and actions (and non-actions) of **Comerica Bank** results in the disparate impact on members of the protected class of black Americans.

The burden shifting duty of **Comerica Bank** is such that must provide the legally sufficient justification to prove that the Bank practices challenged in the Complaint are necessary to achieve one or more of the Banks' substantial legitimate nondiscriminatory interests and that these interests and that these interests – where proven legitimate – could not be served by another practice with a less discriminatory effect.

Where **Comerica Bank** fails in the burden shifting duty the **Illegal Discrimination Claims** stands – and Agency enforcement action is to be imposed – and since the Complaint is filed, inter alia, under the Fair Housing Act the Agency enforcement action must be remedial and robust and places the aggrieved parties -protected class of black Americans – in the position they would have been in if not for the continuing Bank practices of illegal discrimination perpetrated against the protected class of black Americans.

The prima facie case for illegal discrimination is further established pursuant to the **Equal Credit Opportunity Act** Effects Test – which is the method of assessing the discriminatory impact of supposedly neutral credit policies and states clearly

“That the party alleging illegal discrimination need only establish that the action in question has a disproportionately discriminate effect on members of a protected class. And I therefore discriminatory in effect”.

These are the legal standards by which the Agency investigation is supposed to be conducted by – not lobbying softball questions at the named Bank and accepting whatever “answer” the Bank sends back.

Where The **Bureau** chooses to conduct the investigation, we petition that the Agency send the **Agency Directive to Comerica Bank** to answer the Illegal Discrimination Claims directly, completely, honestly and in accordance with the faithful execution of sworn duties under the banking laws and in accordance with the above prima facie case standards

The Claimant petitions that the following rights be honored by **The Bureau**.

The Rights to honest investigations to include independent Agency investigations where The **Bureau** findings are independent of the Banks “addressings” “responses” and “replies” and “representations”. The overarching theme in the [REDACTED] Complaints states that **Comerica Bank** has avoided doing Equal business in the black American Neighborhoods in the 21 specified Zip Codes in Houston.

Rights to comparative analysis of the banking categories – between the two sets of Zip Codes outlined in the Complaint. Neither The **Bureau** nor **Comerica Bank** has the right to

-reframe the Complaint to suit its own purposes and then to offer up an “addressing” to the reframed Claim.

-to bring in outside minority census tracts or other LMI tracts that are all outside of the specified Zip Codes in the Complaint

-to hold the protected class of black Americans to a lowered and lesser standard of full enjoyment of Equal rights secured under the banking laws – US V 1st American Bank- and to use this unequal and unlawful standard to get **Comerica Bank** off on the Claims

The comparative analysis between the two sets of Zip Codes is to be certified for what it is, and it is either Equal or it is not. Where the IDC s state that the black American Neighborhoods have been discriminated against by **Comerica Bank** and are denied the Equal bank branches, the equal bank financed developments and the equal community development loans – and where the physical address reality confirms these Claims the truth is what it is.

Where the IDC states that the individuals, businesses and households in the black American Neighborhoods are discriminated against in the Equal lending of **Comerica Bank** range of lending and credit products – **business lending** - to include start-up, working capital and bridge loans, **mortgages** to include perks as in Skip Payment Privileges , Graduated Payment Mortgages, and **home equity** loans to include full lines of credit and where the **geographical dollar amounts** in these three lending categories confirms these Claims the truth is to be certified for what it is.

Where the IDC states that **Comerica Bank** has discriminated against the black American Neighborhoods and Media in denial of Equal advertisements, marketing, promotions and outreach of its lending and credit products and where the dollar amounts expenditures verify these Claims the truth of the Claims are what they are and are to be confirmed as such.

The protected class of black Americans in the specified Zip Codes are either entitled to the **full enjoyment of Equal rights** secured under the CRA, ECOA, FHA – to include the Final Rule, Fair Lending Laws, Title VIII – 1968 Civil Rights Act and secured under the Equal Protection Clause – 14th Amendment – US Constitution – or **they are not.** Operating under these New Standards to make the determinations is

Has the protected class of black Americans received and are receiving the full enjoyment of Equal rights secured under the above banking laws and other enumerated laws

Where **Comerica Bank** refuses, fails, or does not answer the Claim directly and fails to present the legally sufficient justification to prove that the practices challenged in the Complaint – **Illegal Discrimination Claims** – are necessary to achieve one or more of the Banks' legitimate substantia interests – and that these interest – where legitimate – could not be achieved by another practice with a less discriminatory effect. The Banks legally sufficient justification must be supported with evidence and cannot be speculative or hypothetical – in any attempt to justify the stark disparities in the above the Claim and where **Comerica Banks'** answers are not consistent with the findings of the independent **The Bureau** investigation the Claims are too certified for what they are.

The ████ CRA Protest Complaint outlines the violations of the banking laws: **CRA, FHA- to include the Final Rule, ECOA, Regulation B, FTC Act – Section 5 and HMDA – FTC Act – Section 5 Fair lending laws** and violations of Title VIII – 1968 Civil Rights Act and of the Equal Protection Clause – 14th Amendment – US Constitution. The banking complaint outlines the systemic, pervasive, and continuing **redlining, illegal discrimination, and denial of equal access** to capital perpetrated against the **protected** class of black Americans - as direct result of the entrenched **policies, patterns, and actions** of **Comerica Bank**.

The ████ CRA Protest Complaint outlines illegal discrimination pursuant to the **Effects Test** which states as follows:

--the party alleging illegal discrimination need only establish a prima facie case by showing that the action in question has a disproportionate discriminate effect on members of the protected class, and is therefore discriminatory in effect -----

Enclosed please find the **Illegal Discrimination Claims** letter that outlines the policies of **Comerica Bank** and how these policies have the requisite **disproportionate discriminate effect** on the members of the protected class of black Americans.

Claimant reiterates the earlier Petition to The **Bureau** that **the Banks named in the [REDACTED] banking complaint** be directed to answer the Claims in the [REDACTED] banking complaint directly – as in - refute the Claim completely with evidence and that failing a legitimate business necessity reason that the Claim be certified as part of the findings in the investigation report.

The Claimant petitions for and is entitled to honest enforcement and independent **The Bureau investigations – Independent Financial does not get to investigate itself**

RE: Comerica Bank

This letter and the enclosed stark and glaring disparities and outright denials of the amounts of capital, number of Bank branches, in-house bank investments, bank financed developments, commercial lending, and loan products to include mortgages, home equity and business loans and lines of credit establishes the prima facie case for illegal discrimination, redlining and denial of equal access to capital pursuant to the banking laws, statutes, and regulations – against the above-named Bank.

The law – pursuant to the **New Standards** – outlined in the Fair Housing Act – **Final Rule** (2015), US Supreme Court case – **Texas Department of Housing and Community Affairs V Inclusive Communities Properties Inc.**(2015)and **US V Hudson City Savings Bank FSB** (2015) – pursuant to the Complaint calls for the Bank to provide the **legally sufficient justification** to prove that the challenge practice – in this case Illegal Discrimination Claims – is necessary to achieve one or more of the Banks' **legitimate, substantial, nondiscriminatory interests** – and that these interests – where legitimate – cannot be achieved through another practice or action that has a less discriminatory effect. The legally sufficient justification must be supported by evidence and cannot be hypothetical or speculative.

Where the Bank fails in this 3-tiered test the **Illegal Discrimination Claim** stands, the Claim is certified as true and the prima facie case for disparate impact, disproportionate discriminate effect on members of a protected class and illegal discrimination is established.

Illegal Discrimination Claims

Bank Branch Disparities the **Claim** in the banking complaint is that the Zip Codes and neighborhoods of the protected class of black Americans are systematically denied the free-standing edifices of Bank branches from **Comerica Bank** that stabilize the communities, attracts the banks' own investments, lead to Bank financed developments, attracts outside investments, and lays the groundwork for City and municipal investments. These favorable advantages work to the benefit of the neighborhoods that have the bank branches – **95 %** of which are in the Anglo Zip Codes – but work to the detriment of the neighborhoods denied the free-standing edifices of Bank branches. This **Bank policy** that results in the denial of Bank branches to the black American neighborhoods is not one of business necessity – the only argument available to the Banks. This Bank policy of Bank branch placement has a **devastating, disproportionate discriminate effect** on the black American neighborhoods in that these neighborhoods are denied both the Bank branches and the attendant benefits that come from same. Pursuant to the governing case in **US V Chevy Chase FSB** this action and policy is redlining.

Mortgage Loans the **Claim** in the banking complaint is that **Comerica Bank** illegally discriminates against the protected class of black Americans and denies the equal access to capital for mortgage loans – the higher rejection rate for this loan product is due to the lending and credit policies of these Banks. These Banks set up obstacles that **deny the protected class** its rights of equal access to capital for home equity loans – where the homes of black Americans are appraised differently from the homes in the Anglo neighborhoods; where the state of the community is taken into account to determine approval and where the protected class are denied the favorable benefits of banker discretion of counseling and waiver of certain credit marks to get their home equity loans approved. Since these banks have a higher approval rate for home equity loans in the neighborhoods where the bank has placed Bank branches – the deliberate policy to **deny black American neighborhoods equal (in some cases no Bank branches)** has a devastating effect on the approval of home equity loans in the black American Zip Codes. The few mortgage loans that are made to the protected class of black Americans come saddled with higher interest rates, with higher fees and denial of any of the banker discretionary benefits as in deferments on repayments. This Bank policy is **Disparate Treatment** of black Americans – which is in violation of the banking laws. This lending and credit policy by these Banks has a disproportionate discriminate effect on the protected class of black Americans – and establishes the prima facie case for illegal discrimination – pursuant to the **Effects Test**. **Comerica Bank** illegally discriminates against the protected class of black Americans are denied the **Equal** access and approvals for business loans and lines of credit in both the number of business loans and in the amounts - that are needed to stabilize, develop and to revitalize the neighborhoods. The black American businesses are also denied the equal

advertising and promotion of business loans as well. This Bank policy -- to refusal to finance the businesses in the black American neighborhoods -- both existing and start-ups - is the worst kind of **Disparate Treatment** and forms the worst kind of redlining and is in violation of the banking laws. The Banks also refuse to seek out black American businesses -- as in direct mailings and solicitations- for the loan packages in the same way that it does for the Anglo businesses in the other set of Zip Codes. The black American applicants are denied the wide **banker discretion** of counseling and waiver of credit marks to get their business loans approved in the same way the banks accommodate the Anglo businesses. The few business loans that these Banks do make to the protected class are piecemeal pittances by comparison and come with higher interest rates, denial of any banker discretion of deferments: more onerous late payment penalties and the black American applicants are required to put up larger amounts of collateral. These Bank **policies** form the disproportionate discriminate effect on the protected class of black Americans and establish the prima facie case for illegal discrimination -- pursuant to the **Effects Test**. While **these Banks** are willing to loan black Americans **\$50,000** to buy an expensive vehicle it will not loan black Americans the same **\$50,000** to go into business or for a credit line for an existing business. This is the very kind of subtle and sophisticated illegal discrimination that **The Bureau** must be on lookout for.

Bank Investment Disparities The **Claim** in the banking complaint is that the black American neighborhoods are denied the **equal** in-house investments that **Comerica Bank** makes in the Anglo Zip Codes. The policies that go into the decisions on where to make the Bank investments are not based on any legitimate business necessity. As part of the sophisticated illegal discrimination the Banks make policy decisions that **deny** the black American neighborhoods the free-standing edifices of Bank branches -- then makes further policy decisions to limit its Bank investments to the neighborhoods where the Bank **has placed the bank branches** -- with the net result of the Anglo neighborhoods receiving 95% of the Banks investment -- to the detriment of the neighborhoods in the black American Zip Codes that were denied Bank branches.

The net effect of this deliberate bank policy is that the Bank investments enriches, stabilizes and attracts other investments to the neighborhoods in the Anglo Zip Codes -- with a **reckless disregard** for the rights of equal investment in the black American neighborhoods. This Bank policy denies the protected class all of the favorable advantages and benefits that come with Bank investments and is **Disparate Treatment**. This Bank policy has the disproportionate discriminate effect on the members of the protected class -- and is pursuant to the **Effects Test** -- illegal discrimination.

Bank Financed Developments The **Claim** in the banking complaint is that the black American neighborhoods in the 21 Zip Codes that are redlined by **Comerica Bank** are denied the equal bank financed developments investments that **Comerica Bank** makes in the Anglo Zip Codes. This sophisticated form of (illegal) discrimination follows the same patterns and is formed by the same Bank policy that places the Bank financed

developments – stores, hotels, restaurants, retail outlets, mixed use luxury complexes – only where the Bank has made earlier policy decisions to place the Bank branches and where the Bank has made its own in-house investments i. e. the Anglo neighborhoods. The Bank policy decisions on where to place the **Bank financed developments** are not based on any **legitimate business necessity argument**. As part of the sophisticated illegal discrimination the Banks make policy decisions that deny the black American neighborhoods the free-standing Bank branch edifices and the Banks' own in-house investments and then make further Bank **policy decisions to limit the placement** of the Bank financed developments in the Zip Codes where the Bank has Bank branches and Bank in-house investments.

The net result of this Bank policy is that 95% of the bank financed developments are placed in the Anglo Zip Codes – this Bank policy displays a reckless disregard for the equal rights of the protected class of black Americans and is **Disparate Treatment** of same.

Beyond this the Bank financed developments supports the businesses and properties in the Anglo Zip Codes with no corresponding bank financed developments to support the businesses and properties in the black American Zip Codes. As a direct result of this Bank policy these neighborhoods are denied the **equal investments** of capital of bank financed developments, are denied the stabilizing effects and are aggrieved by the wreckage of neighborhoods that are denied Bank financed developments.

Commercial Building Loans Disparities The **Claim** in the banking complaint is that the black American neighborhoods are **denied the equal** access to capital and equal capital outlays in the form of commercial building loans. The clear majority – 100% - of the **Comerica Bank** commercial building loans are made in the Anglo Zip Codes and go to support the businesses and properties in the Anglo Zip Codes with no corresponding commercial building loan support for the businesses and properties located in the 21 Zip Codes of the protected class. The banks' lending and credit policy on this matter is such that it provides the capital for the commercial building loans in those neighborhoods and Zip Codes with "higher demand".

The fatal defect of this argument is that the Banks' **earlier** lending and credit **policies** are what caused the "**higher demand**" in the Anglo Zip Codes in the first place. The Banks' earlier and initial policies to deliberately place the vast majority **95%** of all of its Bank branches, in-house investments and bank financed developments in the Anglo Zip Codes is what caused the "**higher demand**" now for commercial building loans. The bank now hides behind this policy of "higher demand" to deny the protected class of black Americans in the redlined Zip Codes their rights of equal access to capital and to continue to enrich and to stabilize the neighborhoods in the Anglo Zip Codes.

This bank policy is not one of **business necessity** – the bank would not go out of business where it made the same **equal** access to capital and the same **Equal** capital outlays for commercial building loans in the 21 Zip Codes of the protected class of black

Americans. This policy greatly benefits the citizens, businesses and property owners in the Anglo Zip Codes. This lending and credit policy, however, has a devastatingly disproportionate discriminate effect on the protected class of black Americans.

Advertising/Marketing Disparities The **Claim** in the banking complaint is that the black American Media and the black American citizens are aggrieved by the denial of equal investments in the advertising and marketing of the **Comerica Banks'** loan products and banking services, from the denial of direct mailings and of solicitations by these Banks – both in the dollar amounts and in the number of advertisements. This disparity is part and parcel of the overall denial of equal access to capital and denies the protected class the equal knowledge and the equal benefits of the loan products.

This Bank policy – to **place 99%** of the Bank advertisements in the Anglo general media and in the Anglo business and community newspapers – is not based on any legitimate business necessity on the part of the Banks. The supporting evidence for the redlining charge against these Banks is manifested in the Bank advertising policy and in the fact that the **black American Media is excluded** from the Bank advertising campaigns. The bank named in the RCG banking complaints have never signed full advertising contracts with the black American owned and operated Media – to include newspapers, radio, TV or Internet. **The Bank does not have a single full advertising contract with any black American owned and operated newspaper, radio station or TV** in Houston. The result of this policy of exclusion of equal marketing and advertising dollars and number of advertisements in the black American Media is that the black Americans are not made aware of the loan products and banking services that the Banks offers or of any Bank promotions – and are in effect denied the equal treatment by these Banks.

The vast and glaring disparities in advertising between these two sets of Zip Codes reveals that the Banks prefers one (Anglo Zip Codes) over the other (black American Zip Codes). Since the differences in the amounts of investments in advertising between these two racially distinct areas of **Dallas** is so stark and glaring this in and of itself is redlining and illegal discrimination as pursuant to the holdings in the governing case of **US V Chevy Chase FSB**. This advertising disparity also results in the disproportionate discriminate effect on the protected class of black Americans and establishes the case for illegal discrimination pursuant to the **Effects Test**. There is no legitimate “business necessity” argument to legally justify this brand of discriminatory actions.

Community Development Loans. The **Claim** in the banking complaint is that the protected class of black Americans in the neighborhoods of the 26 Zip Codes in **Dallas** (and in Houston). are denied the equal investments in community development loans by **Comerica Bank**. That 90% of these **Banks'** community development dollars are placed in the Anglo Zip Codes – to the detriment of the 21 Zip Codes of the protected class – is the very kind of disproportionate discriminate effect that the forms the prima facie case for illegal discrimination pursuant to the **Effects Test**. What meager efforts **Comerica Bank** makes in this regard are based on different standards for what constitutes community development – while **these Banks** is willing to make community

development loans available for rehab cesspools, detoxification sewer holes and “affordable housing” in the neighborhoods of the protected class of black Americans it will not and has made any community development loans or investments for high-tech **Centers**; apprenticeship **Academies** to train machinists or welders or for gleaming **Neighborhood Centers** for neighborhood improvements.

Bridge Loans The **Claim** in the banking complaint is that the protected class of black Americans - both **businesses and homeowners** - is aggrieved by the denial of equal access to Bridge Loans from **Comerica Bank**— both in the dollar amounts and in the number of Bridge Loans applications and approvals. This disparity is part and parcel of the overall denial of equal access to capital and denies the protected class the equal benefits of the credit and loan products that the banks freely make available to the Anglo neighborhoods in the Anglo Zip Codes. That **90%** or better of the **Bank** bridge loans are made in the Anglo neighborhoods – to the detriment and reckless disregard for the equal rights of the neighborhoods of the protected class of black Americans. This is the very kind of disproportionate discriminate effect on members of a protected class that forms the prima facie case for illegal discrimination pursuant to the **Effects Test**; that is violation of the **ECOA** and is violation of the holding in **US V Chevy Chase FSB**

Working Capital Loans, The Claim in the banking complaint is that the businesses in the neighborhoods of the protected class of black Americans are denied equal **Working Capital Loans** that freely make available to the businesses in the Anglo neighborhoods – to the tune of a 95% ratio. This denial – like the other denials – has devastating consequences for the survival – much less the thriving – of the businesses in the black American neighborhoods. The negative impact on the whole community leaves in its wake closed businesses and abandoned shops – a situation not suited to attracting the very kind of private investment needed for a thriving neighborhood. This situation also affects the appraisal of home and property values in the community and makes for an unlivable environment. Beyond this the deliberate denial of **Working Capital Loans** to the protected class of black Americans is the worst kind of redlining and illegal discrimination and is in violation of the banking laws: **CRA, ECOA, Regulation B** and of the ruling in **US V Chevy Chase FSB**

Bank Discretionary Accommodations The **Claim** in the banking complaint is that the protected class of black Americans in the neighborhoods of the 21 Zip Codes in **Houston** presently redlined by **Comerica Bank** is aggrieved by the blanket denial of any of the discretionary accommodations to get their loans and credit lines approved. Yet **these same Banks** freely extends all of the discretionary accommodations to the individual applicants and businesses in the Anglo neighborhoods. This policy and practice by **these Banks** have the requisite disproportionate discriminate effect on the protected class of black Americans most egregious kind of illegal discrimination and has devastating effects on the communities and neighborhoods in the 21 Zip Codes of the protected class of black Americans. The denials of the discretionary banker accommodations include: waivers of credit marks, counseling and overrides.

Informational Banking Services – The **Claim** in the banking complaint is that the protected classes of black Americans in the 21 Zip Codes that are presently redlined by **Comerica Bank** are aggrieved by the blanket denial of the direct mailings, solicitations, and pre-approved credit cards that **Comerica Bank** freely makes available to the Anglo Zip Codes. It is **the Banks'** policy to limit the direct mailings and solicitations for the loan products to the neighborhoods where it has placed Bank branches. As **these Banks** discriminates against the neighborhoods of this class for placement of Bank branches the individuals and businesses are also denied the equal Bank informational services in the same way that **Comerica Bank** accommodates the individuals and businesses in the Anglo Zip Codes.

Ascertainment of Credit Needs The **Claim** in the banking complaint is that the neighborhoods of the protected class of black Americans are denied the equal rights under the **CRA** – for **Comerica Bank** to take the equal affirmative steps and the equal continuing actions to assess and to meet the credit needs of the individuals; businesses and non-profits. **Comerica Bank** has not formed any viable and visible working relations and CRA partners in the black American neighborhoods; has not sponsored any “Meet Your Banker” Galas and has not sponsored any real Financial Literacy Seminars at any Hotels or ay any University Halls to accommodate the black Americans in the same way that the Bank does for the Anglo neighborhoods.

Promotion of Loan / Credit Products The **Claim** in the banking complaint is that **Comerica Bank** has failed to promote the loan and credit products in the neighborhoods of the protected class of black Americans in the same way it does in the neighborhoods in the Anglo Zip Codes. The businesses in the first set of neighborhoods are denied even the basic business loan products – much less the “expanded suite of specialty commercial loan products” and “wider array of credit products” that **Comerica Bank** presently provides for the businesses in the Anglo neighborhoods in Houston and beyond.

Overrides/ The Claim in the banking complaint is that the individuals and businesses in the neighborhoods and Zip Codes of the protected class of black Americans are aggrieved by the outright denial of the equal granting of overrides and exceptions to the credit underwriting and pricing policies that **Comerica Bank** freely grants to the individuals and businesses in the Anglo neighborhoods and Zip Codes in Houston.

Factoring The **Claim** in the banking complaint is that the small businesses owned and operated by the protected class of black Americans are denied and are aggrieved by illegal discrimination in the banking service of factoring (Asset based lending). This is an important banking service offered **Comerica Bank** and makes the difference between a thriving business and business failures. **Comerica Bank** does not promote or advertise this banking service to the protected class of black Americans nor does the Claimant find anywhere in the 21 Zip Codes where **Comerica Bank** has made this service available to any of the black American small businesses.

Loan Product Disparate Treatment

The **Claim** in the banking complaint is that the individuals and businesses in the neighborhoods of the protected class of black Americans – **Comerica Bank**:

--are **charged higher rates** of interest for the same loans and credit products as similarly situated Anglo applicants in the second set of Zip Codes

--are required to put up **larger amounts and sizes of collateral** to secure same loans products as similarly situated Anglo applicants and businesses in the second set of Zip Codes

--are **denied** the equal **favorable treatment of deferments** on repayments on the loan products as similarly situated Anglo applicants

These actions, practices and policies of the Banks are violations of the banking laws: **CRA, ECOA, FHA** – to include the Final Rule, **Regulation B, FTC Act – Section 5 and HMDA** form the prima facie case for illegal discrimination pursuant to the **Effects Test** and is redlining and denial of equal access to capital pursuant of the holdings in **US V Hudson City Savings Bank and US V B/A Countywide US V Chevy Chase FSB**

Reverse Redlining

The **Claim** in the banking complaint is that the individuals and businesses in the neighborhoods and Zip Codes of the protected class of black Americans are aggrieved by the Banks policies, practices, actions (and non-actions) that target this class for “approval” of only the most toxic, exploitative and high cost loan and credit products – this includes everything from business, home equity, mortgages, auto, construction and personal loans and lines of credit.

The actions and policies of **Comerica Bank** is **Disparate Treatment** with **Disparate Impact** on the protected class of black Americans and are illegal discrimination pursuant to the **Effects Test** and redlining pursuant to the holdings in **US V Chevy Chase FSB**.

These actions, practices and patterns of **Comerica Bank** are systemic, pervasive, and continuing and will only be corrected by the deep, wide, Color of Money investigation and full prosecution and imposition Fines, Penalties, Sanctions, Monitoring, and capital Fund.

Charitable Contributions The Claim in the banking complaint is that the Charities and non-profits in the neighborhoods of the protected class of black Americans are denied the charitable contributions; **Comerica Bank** employee assistance and the Capital Campaigns that **Comerica Bank** freely makes available for the Non-Profit Corporations in the Anglo Zip Codes. Beyond this outright denial **Comerica Bank** sets different standards for the pittance that it does make to the black Americans Charities – it is limited to the homeless services; rehabilitation cesspools and detoxification sewer holes for a class of degenerates that does not revitalize the community. In the Anglo Zip

Codes **these Banks** makes much larger donations to Charities that stabilize the neighborhoods.

As all three parties to this action are bound by the **laws** and in pursuit of the whole **truth** the Bank must not be allowed to “address” or otherwise dance around the Claim in the banking complaint. To this end Claimant petitions that **Comerica Bank** is to be directed to answer the Claim directly – as in **YES** or **NO** – as in refute completely with evidence and with legitimate business necessity argument. The Claim is either true or it is not.

Disparate Treatment – the protected class of black Americans are denied the equal rights of equal treatment by **Comerica Bank**. AS the individual bankers within these Banks have wide discretion and the granting – or denial – of this discretion makes all of the difference in the granting or denial of credit. The black Americans are denied the **counseling** by these Banks and are denied any **waivers** of credit marks; denied the **banker discretion** to get their loans approved; denied the opportunity for signature loans; denied the equal knowledge of the loan products or of any special promotions due to the Banks policy **to not advertise** in the black American Media; denied the direct mailings and solicitations. This is failure to provide equal information services. AS there is no legitimate “business necessity” argument for these policies and actions that deny equal rights to black Americans and as these policies have a disproportionate discriminate effect on the protected class this establishes the case for illegal discrimination – pursuant to the **Effects Test**. These policies are all the more egregious in that the courts have ruled that this action – **Disparate Treatment** – is intentional discrimination because the difference in treatment on this prohibited basis has no credible non-discriminatory explanation.

Redlining The black Americans in the specified Zip Codes in **Houston** and the in the 26 Zip Codes in Dallas are aggrieved by the policies and actions of these banks and suffer redlining where the Banks practices make for **unequal** access to capital and credit; **unequal** access to the information services; **unequal** access to banking services and **deliberately deny** the protected class the same favorable treatment that the Bank freely extends to the Anglo population in the second set of Zip Codes. The black American neighborhoods are also aggrieved by revers redlining – where the Bank only makes available the high cost toxic loan and credit products.

Disparate Impact the black Americans are further aggrieved by **Comerica Banks**’ seemingly neutral lending and credit policies because these Bank policies disproportionately excludes and places undue burdens on the protected class – as in minimum home mortgage amounts which places the purchase of a home out of reach of the black Americans; as in years long relations with the local Banks to get approved for loan products – the black Americans could not have had the same years’ long relations with the Banks as the Anglo applicants because the black neighborhoods are denied the bank branches; as in requiring years of experience in owning and operating **wealth creating entities** – stock brokerage houses, trading companies and private equity groups – black Americans **could not have** had the years of experience in these entities

because black Americans have historically been denied the equal access to the relatively large amounts of capital needed to own and operate the wealth creating entities in the first place.

Comerica Bank has no credible legally sufficient justification argument to justify the present practices, actions (and non-actions) and policies and actions that result in **disparate treatment** and have the **disproportionate discriminate effect** on the protected class of black Americans is disallowed in the case of **Disparate Treatment** on a prohibited basis. The “substantial, legitimate non-discriminatory” argument is further disallowed to justify discriminatory Bank policies because the argument is routinely dismissed as a pretext for illegal discrimination and redlining. The prima facie case for illegal discrimination is further established due to the disparate impact and disproportionate discriminate effect that the Bank policies have on the members of the protected class – in this case black Americans – pursuant to the **Effects Test**.

The [REDACTED] petitions that in the Complaint proceedings of **Comerica Bank**

-that the Bureau issue the Agency Directive to the Bank to answer the Illegal Discrimination Claims / **Questions directly** and to provide the supporting evidence pursuant to the Fair Housing Act – Final Rule

-Interviews of the Complainant

-Neighborhoods/Zip Code Tours – for comparison purposes

--The CRA Rating remains downgraded and be placed in **indefinite suspension** pending full resolution of the Illegal Discrimination Claims outlined in the [REDACTED] CRA Protest Complaint proceedings

-that enforcement actions at the Agency level be imposed – to include

Fines - **\$500 Million** Dollars , Penalties, Sanctions, Commitment Orders that bar **Comerica Bank** from submitting any Applications – expansionary or otherwise and includes any Main Office Relocation until such time as **Comerica Bank** has corrected , fixed and ended the practice, actions (and non-actions), policies that are the direct result of the disparate impact – in violation of the FHA – Final Rule and in violation of the Equal Credit Opportunity Act and that result in the disproportionate discriminate effect on members of a protected class – in this case black Americans in the specified Zip Codes of Houston (and of Dallas) Illegal Discrimination Claims

--that **Comerica Banks'** FDIC insurance be canceled, Cease and Desist Orders be imposed, and that Removal Orders be executed against the entire Board to include the chairman and of the senior management.

--that the case be referred to the Department of Justice Civil Rights Division for civil actions to be filed against **Comerica Bank**

-that the case be referred to the Department of Housing and Urban Development for civil actions to be filed against **Comerica Bank**

In The Relentless Pursuit of Justice,

[REDACTED]

Chairman / [REDACTED]

[REDACTED]

[REDACTED] — [REDACTED]

[REDACTED]

Christopher Swart
Senior Counsel
Corporate Legal Department
1717 Main Street, Dallas, Texas 75201
214.462.1134 | cswart@comerica.com

August 24, 2023

VIA SECURE CFPB PORTAL

[REDACTED]

Re: Response to CFPB Compliance regarding alleged illegal discrimination

Dear [REDACTED]

Comerica Bank (“Comerica or the “Bank”) is in receipt of the CFPB Complaint that you filed on July 27, 2023 alleging illegal discrimination and making broad assertions referencing numerous laws including the Community Reinvestment Act (“CRA”), the Equal Credit Opportunity Act, the Fair Housing Act, and the Home Mortgage Disclosure Act. As discussed below, the Complaint is unsupported and inconsistent with Comerica’s record of compliance with the CRA and fair lending laws.

Fair Lending Concerns

The Complaint does not provide any specific instances of the Bank’s violation of fair lending laws; consequently, we are not in a position to address your concerns with any level of specificity. We note, however, that neither federal nor state regulators have cited the Bank for violations of any fair lending or anti-discrimination laws. Specifically, in Applicant’s most recent Community Reinvestment Act (CRA) examination, in February of 2021, the FRB did not cite Applicant for violations of any fair lending laws and noted it was not aware of any violations of the Equal Credit Opportunity Act (ECOA) or Regulation B, or of any unfair, deceptive, or abusive acts or practices identified by the Consumer Financial Protection Bureau with respect to Applicant.

Throughout, its history and through its various banking programs, Comerica has demonstrated a consistent and firm commitment to following all applicable laws relating to the provision of banking and financial services, including fair lending and anti-discrimination laws. Comerica’s federal and state regulators have, over the years, reviewed these programs and are well-aware of Applicant’s lending programs, as well as Applicant’s policies and procedures in place to prevent violations of fair lending and anti-discrimination laws. Comerica Bank remains today, as it has throughout its 170+ year history, committed to serving the communities in which it is located in a manner that not only complies with applicable laws, but actively supports and

Community Reinvestment Act Concerns

The Complaint also criticizes Comerica's lending, investment and service performance in the Houston and Dallas metropolitan statistical areas. We note that in Comerica's most recent CRA examination, it received an overall rating of "Satisfactory," and specifically, Applicant's lending, investment, and service performance tests were all rated "High Satisfactory."

- Lending Performance. With respect to lending performance, the FRB noted that Applicant's "lending activity reflects good responsiveness to assessment areas' credit needs," and noted that Applicant "makes a relatively high number of community development loans and services" and provides lending services to LMI borrowers and small business through a combination of participation in government-sponsored lending programs (such as FHA, VA, SBA), in addition to its own small business lending programs.

- Investment Performance. With respect to investment performance, the FRB noted that Applicant had "an excellent level of qualified community development investments and grants," and in this area, "Comerica is often in a leadership position."

- Service Performance. With respect to service performance, the FRB noted that Applicant's retail and community development services "reflect good responsiveness to the needs of the assessment areas," and the Applicant's record of opening and closing branches does not adversely impact the accessibility of services or systems, particularly to LMI customers and communities. The FRB also recognized the commitment by Applicant's employees, including directors, executives, and senior officers, to providing community development services in all states where Applicant provides banking and financial services, including participation in financial literacy programs in LMI communities.

We note that contrary to your Complaint, the FRB specifically found Comerica's lending, investment, and service performance in the Dallas/Ft. Worth assessment area to be strong and responsive to community needs. With respect to HMDA-reportable loans, the FRB found that since 2018, Applicant has consistently outperformed other lenders in the aggregate in terms of the percentage of its HMDA-reportable loans to LMI borrowers. The FRB also noted that 32.7% of Applicant's full-service branches and 27.1% of ATMs in the Dallas/Ft. Worth assessment area are in LMI areas. The FRB conducted a limited-scope review of the Houston assessment area and concluded that Comerica's performance was consistent with the Bank's overall performance in the state of Texas. Comerica's rating for lending, investment, and service was high satisfactory, outstanding, and high satisfactory, respectively, in Texas.

For the foregoing reasons, the Complaint against the Bank should be dismissed by the CFPB.

[REDACTED]
August 24, 2023
Page 3

Sincerely,

[REDACTED]

Christopher Swart
Senior Counsel

cc: [REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Monday, December 5, 2022 3:56 PM
To: [REDACTED]
Subject: FW: [External] CRA Protest Application -
Attachments: CRA Protest Complaint - FRB (1).docx; Zip Codes Dallas (1).docx; Zip Codes Dallas (1) (1).docx

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NONCONFIDENTIAL // FRSONLY



[REDACTED]
Coordinator - Mergers & Acquisitions
 Banking Supervision
 [REDACTED] dal.frb.org

Federal Reserve Bank of Dallas
 2200 N. Pearl St., Dallas, TX 75201
dallasfed.org

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, November 22, 2022 12:17 PM
To: [REDACTED] <[REDACTED]@dal.frb.org>
Subject: [External] CRA Protest Application -

PLEASE NOTE: This email is not from a Federal Reserve address.
 Do not click on suspicious links. Do not give out personal or bank information to unknown senders.

This Letter is the CRA Protest Application filed against Comerica Bank to deny Approval of the New Bank Branch Application; to remove it from expedited processing and another request for Due Process Rights - to include Interview with Complainant.

Please verify receiving

Thank You

[REDACTED]

[REDACTED]

[REDACTED]

Federal Reserve Bank
[REDACTED] - Enforcement

November 21, 2022

RE: CRA Protest Complaint / Illegal Discrimination Claims –

This letter is part of the continuing communications between the Federal Reserve Bank (FRB) and the [REDACTED] ([REDACTED] Claimant) and forms the CRA Protest Complaint filed against **Comerica Bank**. Please find the Illegal Discrimination Claims (IDC) as part of the CRA Protest Complaint against the Approval of the New Bank Branch Applications filed by **Comerica Bank** for the 4145 South Cooper Street - Arlington, Texas 76015 location

This Petition is to take Comerica Banks' New Bank Branch Application out of expedited processing.

The CRA Protest Complaint is filed under the banking laws

-Community Reinvestment Act -Equal Credit Opportunity Act, Fair Housing Act – to include the Final Rule, Home Mortgage Disclosure Act, Fair Lending Laws, FTC Act – Section 5, Regulation B/ C

-under the controlling authority of the applicable Court rulings – US V Chevy Chase FSB, US V Hudson City Savings Bank, US V 1st American Bank, TDHCA V ICP, Inc (Supreme Court case codifying the FHA Final Rule)

-under the Civil Rights laws – Title VIII – 1968 Civil Rights Act

-under the Department rules the HUD Fair Housing Act Final Rule p- and US V Midland States Bancorp

-under the Constitutional laws – Equal Protection Clause – 14th Amendment -United States Constitution

The Claimant petitions that the following rights be honored by the FRB

The Rights to honest investigations to include independent Agency investigations where the FRB findings are independent of the Banks "addressings" "responses" and "replies" and "representations". The overarching theme in the [REDACTED] Complaints states that Comerica Bank has avoided doing Equal business in the black American Neighborhoods in the 21 specified Zip Codes in Dallas.

Rights to comparative analysis of the banking categories – between the two sets of Zip Codes outlined in the Complaint. Neither the FRB nor **Comerica Bank** has the right to

-reframe the Complaint to suit its own purposes and then to offer up an "addressing" to the reframed Claim.

-to bring in outside minority census tracts or other LMI tracts that are all outside of the specified Zip Codes in the Complaint

-to hold the protected class of black Americans to a lowered and lesser standard of full enjoyment of Equal rights secured under the banking laws – US V 1st American Bank- and to use this unequal and unlawful standard to get **Comerica Bank** off on the Claims

The comparative analysis between the two sets of Zip Codes is to be certified for what it is and it is either Equal or it is not. Where the IDC s state that the black American Neighborhoods have been discriminated against by **Comerica Bank** and are denied the Equal bank branches, the equal bank financed developments and the equal community development loans – and where the physical address reality confirms these Claims the truth is what it is.

Where the IDC states that the individuals, businesses and households in the black American Neighborhoods are discriminated against in the Equal lending of **Comerica Bank** 's range of lending and credit products – business lending - to include start-up, working capital and bridge loans, mortgages to include perks as in Skip Payment Privileges , Graduated Payment Mortgages, and home equity loans to include full lines of credit and where the geographical dollar amounts in these three lending categories confirms these Claims the truth is to be certified for what it is.

Where the IDC states that **Comerica Bank** has discriminated against the black American Neighborhoods and Media in denial of Equal advertisements, marketing, promotions and outreach of its lending and credit products and where the dollar amounts expenditures verify these Claims the truth of the Claims are what they are and are to be confirmed as such.

The protected class of black Americans in the specified Zip Codes are either entitled to the full enjoyment of Equal rights secured under the CRA, ECOA, FHA – to include the Final Rule, Fair Lending Laws, Title VIII – 1968 Civil Rights Act and secured under the Equal Protection Clause – 14th Amendment – US Constitution – or they are not. Operating under these New Standards to make the determinations is

Has the protected class of black Americans received and are receiving the full enjoyment of Equal rights secured under the above banking laws and other enumerated laws

Where **Comerica Bank** refuses, fails or does not answer the Claim directly and fails to present the legally sufficient justification to prove that the practices challenged in the Complaint – Illegal Discrimination Claims – are necessary to achieve one or more of the Banks' legitimate substantia interests – and that these interest – where legitimate – could not be achieved by another practice with a less discriminatory effect. The Banks legally sufficient justification must be supported with evidence and cannot be speculative or hypothetical – in any attempt to justify the stark disparities in the above

the Claim and where **Comerica Bank's** answers are not consistent with the findings of the independent FRB investigation the Claims are too certified for what they are.

The RIG CRA Protest Complaint outlines the violations of the banking laws: CRA, FHA- to include the Final Rule, ECOA, Regulation B, FTC Act – Section 5 and HMDA –FTC Act – Section 5 and violations of Title VIII – 1968 Civil Rights Act and of the Equal Protection Clause – 14th Amendment – US Constitution. The banking complaint outlines the systemic, pervasive and continuing redlining, illegal discrimination and denial of equal access to capital perpetrated against the protected class of black Americans - as direct result of the entrenched policies, patterns and actions of [REDACTED]

The [REDACTED] CRA Protest Complaint outlines illegal discrimination pursuant to the Effects Test which states as follows:

--the party alleging illegal discrimination need only establish a prima facie case by showing that the action in question has a disproportionate discriminate effect on members of the protected class, and is therefore discriminatory in effect -----

Enclosed please find the Illegal Discrimination Claims letter that outlines the policies of **Comerica Bank** and how these policies have the requisite disproportionate discriminate effect on the members of the protected class of black Americans.

Claimant reiterates the earlier Petition to the FRB that the Banks named in the [REDACTED] banking complaint be directed to answer the Claims in the [REDACTED] banking complaint directly – as in - refute the Claim completely with evidence and that failing a legitimate business necessity reason that the Claim be certified as part of the findings in the investigation report.

The Claimant petitions for and is entitled to honest enforcement and independent FRB investigations – **Comerica Bank** does not get to investigate itself

RE: Comerica Bank

This letter and the enclosed stark and glaring disparities and outright denials of the amounts of capital, number of Bank branches, in-house bank investments, bank financed developments, commercial lending and loan products to include mortgages, home equity and business loans and lines of credit establishes the prima facie case for illegal discrimination, redlining and denial of equal access to capital pursuant to the banking laws, statutes and regulations – against the above-named Bank

The law – pursuant to the New Standards – outlined in the Fair Housing Act – Final Rule (2015), US Supreme Court case – Texas Department of Housing and Community Affairs V Inclusive Communities Properties Inc.(2015)and US V Hudson City Savings

Bank FSB (2015) – pursuant to the Complaint calls for the Bank to provide the legally sufficient justification to prove that the challenge practice – in this case Illegal Discrimination Claims – is necessary to achieve one or more of the Banks' legitimate, substantial, nondiscriminatory interests – and that these interests – where legitimate – cannot be achieved through another practice or action that has a less discriminatory effect. The legally sufficient justification must be supported by evidence and cannot be hypothetical or speculative.

Where the Bank fails in this 3-tiered test the Illegal Discrimination Claim stands, the Claim is certified as true and the prima facie case for disparate impact, disproportionate discriminate effect on members of a protected class and illegal discrimination is established.

Illegal Discrimination Claims

Bank Branch Disparities the Claim in the banking complaint is that the Zip Codes and neighborhoods of the protected class of black Americans are systematically denied the free-standing edifices of Bank branches from **Comerica Bank** that stabilize the communities, attracts the banks' own investments, lead to Bank financed developments, attracts outside investments and lays the groundwork for City and municipal investments. These favorable advantages work to the benefit of the neighborhoods that have the bank branches – 95 % of which are in the Anglo Zip Codes – but work to the detriment of the neighborhoods denied the free-standing edifices of Bank branches. This Bank policy that results in the denial of Bank branches to the black American neighborhoods is not one of business necessity – the only argument available to the Banks. This Bank policy of Bank branch placement has a devastating, disproportionate discriminate effect on the black American neighborhoods in that these neighborhoods are denied both the Bank branches and the attendant benefits that come from same. Pursuant to the governing case in US V Chevy Chase FSB this action and policy is redlining.

Home Equity Loans The Claim in the banking complaint is that **Comerica Bank** illegally discriminates against the protected class of black Americans and denies the equal access to capital for home equity loans – the higher rejection rate for this loan product is due to the lending and credit policies of these Banks. These Banks set up obstacles that deny the protected class its rights of equal access to capital for home equity loans – where the homes of black Americans are appraised differently from the homes in the Anglo neighborhoods; where the state of the community is taken into account to determine approval and where the protected class are denied the favorable benefits of banker discretion of counseling and waiver of certain credit marks to get their home equity loans approved. Since these banks have a higher approval rate for home equity loans in the neighborhoods where the bank has placed Bank branches – the

Deliberate policy to deny black American neighborhoods equal (in some cases no Bank branches) has a devastating effect on the approval of home equity loans in the black

American Zip Codes. The few mortgage loans that are made to the protected class of black Americans come saddled with higher interest rates, with higher fees and denial of any of the banker discretionary benefits as in deferments on repayments. This Bank policy is Disparate Treatment of black Americans – which is in violation of the banking laws. This lending and credit policy by these Banks have a disproportionate discriminate effect on the protected class of black Americans – and establishes the prima facie case for illegal discrimination – pursuant to the **ECOA Effects Test**

Business Loans / Lines of Credit The Claim in the banking complaint is that **Comerica Bank** illegally discriminates against the protected class of black Americans are denied the Equal access and approvals for business loans and lines of credit in both the number of business loans and in the amounts - that are needed to stabilize, develop and to revitalize the neighborhoods. The black American businesses are also denied the equal advertising and promotion of business loans as well. This Bank policy -- to refusal to finance the businesses in the black American neighborhoods – both existing and start-ups - is the worst kind of Disparate Treatment and forms the worst kind of redlining and is in violation of the banking laws. The Banks also refuse to seek out black American businesses – as in direct mailings and solicitations- for the loan packages in the same way that it does for the Anglo businesses in the other set of Zip Codes. The black American applicants are denied the wide banker discretion of counseling and waiver of credit marks to get their business loans approved in the same way the banks accommodate the Anglo businesses. The few business loans that these Banks do make to the protected class are piecemeal pittances by comparison and come with higher interest rates, denial of any banker discretion of deferments: more onerous late payment penalties and the black American applicants are required to put up larger amounts of collateral. These Bank policies form the disproportionate discriminate effect on the protected class of black Americans and establish the prima facie case for illegal discrimination – pursuant to the Effects Test. While these Banks are willing to loan black Americans \$50,000 to buy an expensive vehicle it will not loan black Americans the same \$50,000 to go into business or for a credit line for an existing business. This is the very kind of subtle and sophisticated illegal discrimination that The FRB must be on lookout for.

Bank Investment Disparities The Claim in the banking complaint is that the black American neighborhoods are denied the equal in-house investments that **Comerica Bank** makes in the Anglo Zip Codes. The policies that go into the decisions on where to make the Bank investments are not based on any legitimate business necessity. As part of the sophisticated illegal discrimination the Banks make policy decisions that deny the black American neighborhoods the free-standing edifices of Bank branches – then makes further policy decisions to limit its Bank investments to the neighborhoods where the Bank has placed the bank branches – with the net result of the Anglo neighborhoods receiving 95% of the Banks investment – to the detriment of the neighborhoods in the black American Zip Codes that were denied Bank branches.

The net effect of this deliberate bank policy is that the Bank investments enriches, stabilizes and attracts other investments to the neighborhoods in the Anglo Zip Codes – with a reckless disregard for the rights of equal investment in the black American neighborhoods. This Bank policy denies the protected class all of the favorable advantages and benefits that come with Bank investments and is Disparate Treatment. This Bank policy has the disproportionate discriminate effect on the members of the protected class – and is pursuant to the Effects Test – illegal discrimination.

Bank Financed Developments The Claim in the banking complaint is that the black American neighborhoods in the 21 Zip Codes that are redlined by **Comerica Bank** are denied the equal bank financed developments investments that **Comerica Bank** makes in the Anglo Zip Codes. This sophisticated form of (illegal) discrimination follows the same patterns and is formed by the same Bank policy that places the Bank financed developments – stores, hotels, restaurants, retail outlets, mixed use luxury complexes – only where the Bank has made earlier policy decisions to place the Bank branches and where the Bank has made its own in-house investments i. e. the Anglo neighborhoods. The Bank policy decisions on where to place the Bank financed developments are not based on any legitimate business necessity argument. As part of the sophisticated illegal discrimination the Banks make policy decisions that deny the black American neighborhoods the free-standing Bank branch edifices and the Banks' own in-house investments and then make further Bank policy decisions to limit the placement of the Bank financed developments in the Zip Codes where the Bank has Bank branches and Bank in-house investments.

The net result of this Bank policy is that 95% of the bank financed developments are placed in the Anglo Zip Codes – this Bank policy displays a reckless disregard for the equal rights of the protected class of black Americans and is Disparate Treatment of same.

Beyond this the Bank financed developments supports the businesses and properties in the Anglo Zip Codes with no corresponding bank financed developments to support the businesses and properties in the black American Zip Codes. As a direct result of this Bank policy these neighborhoods are denied the equal investments of capital of bank financed developments, are denied the stabilizing effects and are aggrieved by the wreckage of neighborhoods that are denied Bank financed developments.

Commercial Building Loans Disparities The Claim in the banking complaint is that the black American neighborhoods are denied the equal access to capital and equal capital outlays in the form of commercial building loans. The vast majority – 95% - of the **Comerica Bank** commercial building loans are made in the Anglo Zip Codes and go to support the businesses and properties in the Anglo Zip Codes with no corresponding commercial building loan support for the businesses and properties located in the 21 Zip Codes of the protected class. The banks' lending and credit policy on this matter is such that it provides the capital for the commercial building loans in those neighborhoods and Zip Codes with “higher demand”.

The fatal defect of this argument is that the Banks' earlier lending and credit policies are what caused the "higher demand" in the Anglo Zip Codes in the first place. The Banks' earlier and initial policies to deliberately place the vast majority 95% of all of its Bank branches, in-house investments and bank financed developments in the Anglo Zip Codes is what caused the "higher demand" now for commercial building loans. The bank now hides behind this policy of "higher demand" to deny the protected class of black Americans in the redlined Zip Codes their rights of equal access to capital and to continue to enrich and to stabilize the neighborhoods in the Anglo Zip Codes.

This bank policy is not one of business necessity – the bank would not go out of business where it made the same equal access to capital and the same Equal capital outlays for commercial building loans in the 21 Zip Codes of the protected class of black Americans. This policy greatly benefits the citizens, businesses and property owners in the Anglo Zip Codes. This lending and credit policy, however, has a devastatingly disproportionate discriminate effect on the protected class of black Americans.

Advertingis/Marketing Disparities The Claim in the banking complaint is that the black American Media and the black American citizens are aggrieved by the denial of equal investments in the advertising and marketing of the **Comerica Bank**'s loan products and banking services, from the denial of direct mailings and of solicitations by these Banks – both in the dollar amounts and in the number of advertisements. This disparity is part and parcel of the overall denial of equal access to capital and denies the protected class the equal knowledge and the equal benefits of the loan products.

This Bank policy – to place 99% of the Bank advertisements in the Anglo general media and in the Anglo business and community newspapers – is not based on any legitimate business necessity on the part of the Banks. The supporting evidence for the redlining charge against these Banks is manifested in the Bank advertising policy and in the fact that the black American Media is excluded from the Bank advertising campaigns. The bank named in the RIG banking complaints have never signed full advertising contracts with the black American owned and operated Media – to include newspapers, radio, TV or Internet.

The Bank does not have a single full advertising contract with any black American owned and operated newspaper, radio station or TV in Dallas. The result of this policy of exclusion of equal marketing and advertising dollars and number of advertisements in the black American Media is that the black Americans are not made aware of the loan products and banking services that the Banks offers or of any Bank promotions – and are in effect denied the equal treatment by these Banks. The vast and glaring disparities in advertising between these two sets of Zip Codes reveals that the Banks prefers one (Anglo Zip Codes) over the other (black American Zip Codes). Since the differences in the amounts of investments in advertising between these two racially distinct areas of Houston is so stark and glaring this in and of itself is redlining and illegal discrimination as pursuant to the holdings in the governing case of US V Chevy Chase FSB. This advertising disparity also results in the disproportionate discriminate effect on the

protected class of black Americans and establishes the case for illegal discrimination pursuant to the Effects Test. There is no legitimate “business necessity” argument to legally justify this brand of discriminatory actions.

Community Development Loans. The Claim in the banking complaint is that the protected class of black Americans in the neighborhoods of the 21 Zip Codes in Dallas are denied the equal investments in community development loans by [REDACTED]. That 90% of these Banks’ community development dollars are placed in the Anglo Zip Codes – to the detriment of the 21 Zip Codes of the protected class – is the very kind of disproportionate discriminate effect that forms the prima facie case for illegal discrimination pursuant to the Effects Test. What meager efforts **Comerica Bank** makes in this regard are based on different standards for what constitutes community development – while these Banks is willing to make community development loans available for rehab cesspools, detoxification sewer holes and “affordable housing” in the neighborhoods of the protected class of black Americans it will not and has made any community development loans or investments for high-tech Centers; apprenticeship Academies to train machinists or welders or for gleaming Neighborhood Centers for neighborhood improvements.

Bridge Loans The Claim in the banking complaint is that the protected class of black Americans - both businesses and homeowners - is aggrieved by the denial of equal access to Bridge Loans from **Comerica Bank** – both in the dollar amounts and in the number of Bridge Loans applications and approvals. This disparity is part and parcel of the overall denial of equal access to capital and denies the protected class the equal benefits of the credit and loan products that the banks freely make available to the Anglo neighborhoods in the Anglo Zip Codes. That 90% or better of the Bank bridge loans are made in the Anglo neighborhoods – to the detriment and reckless disregard for the equal rights of the neighborhoods of the protected class of black Americans. This is the very kind of disproportionate discriminate effect on members of a protected class that forms the prima facie case for illegal discrimination pursuant to the Effects Test; that is violation of the ECOA and is violation of the holding in US V Chevy Chase FSB

Working Capital Loans, The Claim in the banking complaint **is** that **the** businesses in the neighborhoods of the protected class of black Americans are denied equal Working Capital Loans that **Comerica Bank** freely make available to the businesses in the Anglo neighborhoods – to the tune of a 95% ratio. This denial – like the other denials – has devastating consequences for the survival – much less the thriving – of the businesses in the black American neighborhoods. The negative impact on the whole community leaves in its wake closed businesses and abandoned shops – a situation not suited to attracting the very kind of private investment needed for a thriving neighborhood. This situation also affects the appraisal of home and property values in the community and makes for an unlivable environment. Beyond this the deliberate denial of Working Capital Loans to the protected class of black Americans is the worst kind of redlining

and illegal discrimination and is in violation of the banking laws: CRA, ECOA, Regulation B and of the ruling in US V Chevy Chase FSB

Bank Discretionary Accommodations The Claim in the banking complaint is that the protected class of black Americans in the neighborhoods of the specified Zip Codes in Dallas presently redlined by **Comerica Bank** is aggrieved by the blanket denial of any of the discretionary accommodations to get their loans and credit lines approved. Yet these same Banks freely extends all of the discretionary accommodations to the individual applicants and businesses in the Anglo neighborhoods. This policy and practice by these Banks has the requisite disproportionate discriminate effect on the protected class of black Americans most egregious kind of illegal discrimination and has devastating effects on the communities and neighborhoods in the 21 Zip Codes of the protected class of black Americans. The denials of the discretionary banker accommodations include: waivers of credit marks, counseling and overrides.

Informational Banking Services – The Claim in the banking complaint is that the protected classes of black Americans in the 21 Zip Codes that are presently redlined by **Comerica Bank** are aggrieved by the blanket denial of the direct mailings, solicitations and pre-approved credit cards that these Banks freely makes available to the Anglo Zip Codes. It is the Banks' policy to limit the direct mailings and solicitations for the loan products to the neighborhoods where it has placed Bank branches. As these Banks discriminates against the neighborhoods of this class for placement of Bank branches the individuals and businesses are also denied the equal Bank informational services in the same way that **Comerica Bank** accommodates the individuals and businesses in the Anglo Zip Codes.

Ascertainment of Credit Needs The Claim in the banking complaint is that the neighborhoods of the protected class of black Americans are denied the equal rights under the CRA – for **Comerica Bank** to take the equal affirmative steps and the equal continuing actions to assess and to meet the credit needs of the individuals; businesses and non-profits. **Comerica Bank** has not formed any viable and visible working relations and CRA Partners in the black American neighborhoods; has not sponsored any “Meet Your Banker” Galas and has not sponsored any real Financial Literacy Seminars at any Hotels or ay any University Halls to accommodate the black Americans in the same way that the Bank does for the Anglo neighborhoods.

Promotion of Loan / Credit Products The Claim in the banking complaint is that **Comerica Bank** has failed to promote the loan and credit products in the neighborhoods of the protected class of black Americans in the same way it does in the neighborhoods in the Anglo Zip Codes. The businesses in the first set of neighborhoods are denied even the basic business loan products – much less the “expanded suite of specialty commercial loan products” and “wider array of credit products” that **Comerica Bank** presently provides for the businesses in the Anglo neighborhoods in Dallas and beyond.

Overrides/ The Claim in the banking complaint is that the individuals and businesses in the neighborhoods and Zip Codes of the protected class of black Americans are aggrieved by the outright denial of the equal granting of overrides and exceptions to the credit underwriting and pricing policies that **Comerica Bank** freely grants to the individuals and businesses in the Anglo neighborhoods and Zip Codes in Houston (and in Dallas).

Factoring The Claim in the banking complaint is that the small businesses owned and operated by the protected class of black Americans are denied and are aggrieved by illegal discrimination in the banking service of factoring (Asset based lending). This is an important banking service offered by **Comerica Bank**. It is one where the outstanding invoices of a business are purchased by the Bank with the Bank making available immediate working capital for the business – and can make the difference between a business thriving and a business failure. **Comerica Bank** does not promote or advertise this banking service to the protected class of black Americans nor does the Claimant find anywhere in the specified Zip Codes where these Banks has made this service available to any of the black American small businesses.

Loan Product Disparate Treatment

The Claim in the banking complaint is that the individuals and businesses in the neighborhoods of the protected class of black Americans – even where approved for loans – are aggrieved by the unequal and discriminatory actions of **Comerica Bank**:

--are charged higher rates of interest for the same loans and credit products as similarly situated Anglo applicants in the second set of Zip Codes

--are required to put up larger amounts and sizes of collateral to secure same loans products as similarly situated Anglo applicants and businesses in the second set of Zip Codes

--are denied the equal favorable treatment of deferments on repayments on the loan products as similarly situated Anglo applicants

These actions, practices and policies of the Banks are violations of the banking laws: CRA, ECOA, FHA – to include the Final Rule, Regulation B, FTC Act – Section 5 and HMDA form the prima facie case for illegal discrimination pursuant to the Effects Test and is redlining and denial of equal access to capital pursuant of the holdings in US V Hudson City Savings Bank and US V B/A Countywide US V Chevy Chase FSB

Reverse Redlining

The Claim in the banking complaint is that the individuals and businesses in the neighborhoods and Zip Codes of the protected class of black Americans are aggrieved by the Banks policies, practices, actions (and non-actions) that target this class for “approval” of only the most toxic, exploitative and high cost loan and credit products –

this includes everything from business, home equity, mortgages, auto, construction and personal loans and lines of credit.

The actions and policies of **Comerica Bank** is Disparate Treatment with Disparate Impact on the protected class of black Americans and are illegal discrimination pursuant to the Effects Test and redlining pursuant to the holdings in US V Chevy Chase FSB.

These actions, practices and patterns of these Banks are systemic, pervasive and continuing and will only be corrected by the deep, wide, Color of Money investigation and full prosecution and imposition Fines, Penalties, Sanctions, Monitoring and capital Fund.

Charitable Contributions The Claim in the banking complaint is that the Charities and non-profits in the neighborhoods of the protected class of black Americans are denied the charitable contributions; Bank employee assistance and the Capital Campaigns that **Comerica Bank** freely makes available for the Non-Profit Corporations in the Anglo Zip Codes. Beyond this outright denial **Comerica Bank** sets different standards for the pittance that it does make to the black Americans Charities – it is limited to the homeless services; rehabilitation cesspools and detoxification sewer holes for a class of degenerates that does not revitalize the community. In the Anglo Zip Codes these Banks makes much larger donations to Charities that actually stabilize the neighborhoods.

As all three parties to this action are bound by the laws and in pursuit of the whole truth the Bank must not be allowed to “address” or otherwise dance around the Claim in the banking complaint. To this end Claimant petitions that **Comerica Bank** is to be directed to answer the Claim directly – as in YES or NO – as in refute completely with evidence and with legitimate business necessity argument. The Claim is either true or it is not.

Disparate Treatment – the protected class of black Americans are denied the equal rights of equal treatment by **Comerica Bank**. AS the individual bankers within these Banks have wide discretion and the granting – or denial – of this discretion makes all of the difference in the granting or denial of credit. The black Americans are denied the counseling by these Banks and are denied any waivers of credit marks; denied the banker discretion to get their loans approved; denied the opportunity for signature loans; denied the equal knowledge of the loan products or of any special promotions due to the Banks policy to not advertise in the black American Media; denied the direct mailings and solicitations. This is failure to provide equal information services. AS there is no legitimate “business necessity” argument for these policies and actions that deny equal rights to black Americans and as these policies have a disproportionate discriminate effect on the protected class this establishes the case for illegal discrimination – pursuant to the Effects **Test**. These policies are all the more egregious in that the courts have ruled that this action – Disparate Treatment – is intentional discrimination because the difference in treatment on this prohibited basis has no credible non-discriminatory explanation.

Redlining The black Americans in the 21 Zip Codes in Dallas are aggrieved by the policies and actions of these banks and suffer redlining where the Banks practices make for unequal access to capital and credit; unequal access to the information services; unequal access to banking services and deliberately deny the protected class the same favorable treatment that the Bank freely extends to the Anglo population in the second set of Zip Codes. The black American neighborhoods are also aggrieved by revers redlining – where the Bank only makes available the high cost toxic loan and credit products.

Disparate Impact the black Americans are further aggrieved by **Comerica Bank 's** seemingly neutral lending and credit policies because these Bank policies disproportionately excludes and places undue burdens on the protected class – as in minimum home mortgage amounts which places the purchase of a home out of reach of the black Americans; as in years long relations with the local Banks to get approved for loan products – the black Americans could not have had the same years' long relations with the Banks as the Anglo applicants because the black neighborhoods are denied the bank branches; as in requiring years of experience in owning and operating wealth creating entities – stock brokerage houses, trading companies and private equity groups – black Americans could not have had the years of experience in these entities because black Americans have historically been denied the equal access to the relatively large amounts of capital needed to own and operate the wealth creating entities in the first place.

Comerica Bank has no credible legally sufficient justification argument to justify the present practices, actions (and non-actions) and policies and actions that result in disparate treatment and have the disproportionate discriminate effect on the protected class of black Americans because a “legally sufficient justification” argument is disallowed in the case of

Disparate Treatment on a prohibited basis. The “substantial, legitimate non-discriminatory” argument is further disallowed to justify discriminatory Bank policies because the argument is routinely dismissed as a pretext for illegal discrimination and

redlining. The prima facie case for illegal discrimination is further established due to the disparate impact and disproportionate discriminate effect that the Bank policies have on the members of the protected class – in this case black Americans – pursuant to the **Effects Test**.

The ■■■ petitions that the **Comerica Bank**

--New Bank Branch Applications be **taken out of expedited processing** and be placed in indefinite suspension pending full resolution of the CRA Protest Complaint proceedings

--New Bank Branch Applications be denied with no possibility of any new expansionary activities Applications until the Bank is in full compliance with the banking pursuant to the FHA Final Rule and the above outlined Supreme Court case on disparate impact

-that enforcement actions at the Agency level be imposed – to include

Fines - \$500 Million Dollars , Penalties, Sanctions, Commitment Orders that bar Plains Capital Bank from submitting any Applications – expansionary or otherwise and includes any **Bank Application** until such time as Comerica Bank has corrected , fixed and ended the practice, actions (and non-actions), policies that are the direct result of the disparate impact – in violation of the FHA – Final Rule and that result in the disproportionate discriminate effect on members of a protected class – in this case black Americans in the specified Zip Codes of Dallas Illegal Discrimination Claims

--that **Comerica Banks'** FDIC insurance be canceled, Cease and Desist Orders be imposed and that Removal Orders be executed against the entire Board to include the chairman and of the senior management.

--that the case be referred to the Department of Justice Civil Rights Division for civil actions to be filed against **Comerica Bank**

-that the case be referred to the Department of Housing and Urban Development for civil actions to be filed against **Comerica Bank**

The Rules that the FRB and the Board and this proceeding are bound by are clear: the Bank named in the Complaint – **Comerica Bank**- is either in full compliance with all of the components of all of the banking laws; in full compliance with all of the components of the Civil Rights laws; in full compliance with all of the components of the Constitutional laws -Equal Protection Clause – 14th Amendment -and in full compliance with all of the

components of the controlling authority of the applicable Court rulings – (as cited above) or the Bank is not in full compliance with all of the above.

Where **Comerica Bank** is not in full compliance with all of the components of al of the above– and cannot provide the supporting evidence – the Banks' New Application cannot be approved and must be denied until such time that Comerica Bank is in full compliance with all of the components of all of the above

In The Relentless Pursuit of Justice,

[REDACTED]

[REDACTED]

[REDACTED]

JUNE 10, 2010

This letter is part of the banking complaints that the [REDACTED] [REDACTED] has filed with the **FRB**. The banking complaints highlight entrenched systemic, pervasive and continuing illegal discrimination, redlining and denial of equal access to capital – as direct result of the **Bank lending and credit policies** of whole neighborhoods of the protected class of black Americans in by the Banks named in the [REDACTED] banking complaints.

The specific neighborhoods that are aggrieved by the **Bank lending and credit policies** that deny the equal access to capital and credit and result in the disproportionate discriminate effect perpetrated against the protected class of black Americans are: **75215, 75218, 75214, 75223, 75298,75206,75134,77242,75224,75216,,75210,75236,75211,75237,75204,75235,75202,7521, 75134,75207,75226,75233,75232,77208.. ----- South Dallas**

These neighborhoods suffer from the discriminatory effect of the bank policies that **denies equal access to Capital** – the very capital that is needed to make these neighborhoods whole. The black Americans in these **Zip Codes** are further aggrieved by the Banks deliberate refusal to solicit business and refusal to advertise the loan products and to provide the banking services in these neighborhoods – the way it does for the Anglo Zip Codes. Beyond this these neighborhoods are denied the equal **Bank branches – free-standing edifices- and bank** financed developments that stabilize neighborhoods. The citizens in these Zip Codes also are aggrieved by the unequal availability of mortgages, home equity loans and business loans and by the **Disparate Treatment** from these Banks.

The comparative neighborhoods – Anglo Zip Codes – that benefit not only from a disproportionate number of Bank branches – free-standing edifices – but also from the Bank officers actively seeking out the citizens and businesses in these Zip Codes to make sure all of their capital and credit needs are met. The Zip Codes favored by these Banks are:**77093,75230 75231,75225,75203,75205,75225,75206,75214,75242,75254,75962,75240,75242,75254,75248 ,75006,75287,75234,75252,75080,75230,75243,75231,75075,75001,75244,75251,75093,7502 5,7508,75007,75225,75251,75214, 75219, 75062,77205,75206 and 77042. In these** neighborhoods developers receive hundreds of millions of dollars in loans and lines of credit with little or no collateral- similarly situated black American developers are denied same and prospective Anglo home-owners are not relegated to sub-prime loans the way similarly situated black Americans are

Where the homebuyers in the Anglo neighborhoods request home equity loans to maintain their property values the banks not only grant these loans but have waived whatever credit marks have to be waived to guarantee loan approval. Where the business owners in the Anglo Zip Codes apply for loans and lines of credit the Banks counsel the applicants and waive credit marks to get the business loans approved. As no such counseling or waiver by the Banks is granted to the black American applicants the first set of Zip Codes suffer disproportionately as a result of the Bank policies. Negative credit marks are not a **“death sentence”** for the Anglo Zip

Codes the way the same negative credit marks are for the protected class of black Americans in the first set of Zip Codes – in Dallas, Texas MSA.

JUNE 10, 2010

This letter is part of the banking complaints that the [REDACTED] [REDACTED] has filed with the **FRB**. The banking complaints highlight entrenched systemic, pervasive and continuing illegal discrimination, redlining and denial of equal access to capital – as direct result of the **Bank lending and credit policies** of whole neighborhoods of the protected class of black Americans in by the Banks named in the [REDACTED] banking complaints.

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These neighborhoods suffer from the discriminatory effect of the bank policies that **denies equal access to Capital** – the very capital that is needed to make these neighborhoods whole. The black Americans in these **Zip Codes** are further aggrieved by the Banks deliberate refusal to **solicit** business and refusal **to advertise** the loan products and to **provide** the banking services in these neighborhoods – the way it does for the Anglo Zip Codes. Beyond this these neighborhoods are denied the equal **Bank branches – free-standing edifices- and bank** financed developments that stabilize neighborhoods. The citizens in these Zip Codes also are aggrieved by the unequal availability of mortgages, home equity loans and business loans and by the **Disparate Treatment** from these Banks.

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December 14, 2022

Via FedEZFile

██████████
Director – Applications
Federal Reserve Bank of Dallas
Banking Supervision Department
2200 N. Pearl Street
Dallas, Texas 75201

Subject: Application by Comerica Bank, Dallas, Texas (“Applicant” or “we”) to establish a branch located at 4145 S. Cooper St., Arlington, Tarrant County, TX 76015, pursuant to Section 9 of the Federal Reserve Act.

Dear ██████████

In response to your letter dated December 5, 2022, regarding the application by Comerica Bank to establish the above-referenced branch, we are pleased to provide additional information to address the issues raised by Mr. ██████████ in his correspondence to your office. As a preliminary matter, we note that the issues raised by ██████████ in his letter dated November 21, 2022 are substantively the same issues that ██████████ has raised in prior letters to the Federal Reserve Bank of Dallas (“FRB”) regarding Applicant.

Fair Lending Concerns

In his letter, ██████████ makes several broad assertions accusing Applicant of violations of federal fair lending laws. ██████████ letter, however, provides no information regarding any specific instances involving Applicant’s violation fair lending laws; consequently, we are not in a position to address his concerns with any level of specificity. We note, however, that to date, neither Applicant’s federal nor state regulators have cited Applicant for violations of any fair lending or anti-discrimination laws. Specifically, in Applicant’s most recent Community Reinvestment Act (CRA) examination, in February of 2021¹, the FRB did not cite Applicant for violations of any fair lending laws and noted it was not aware of any violations of the Equal Credit Opportunity Act (ECOA) or Regulation B, or of any unfair, deceptive, or abusive acts or practices identified by the Consumer Financial Protection Bureau with respect to Applicant.

Throughout its history and through its various banking programs, Applicant has demonstrated a consistent and firm commitment to following all applicable laws relating to the provision of banking and financial services, including fair lending and anti-discrimination laws. Applicant’s federal and state regulators have, over the years, reviewed these programs and are well-aware of Applicant’s lending programs, as well as Applicant’s policies and procedures in place to prevent violations of fair lending and

¹ Community Reinvestment Act Performance Evaluation – Public Disclosure (February 8, 2021)

anti-discrimination laws. As we previously noted, [REDACTED] does not raise concerns regarding any specific instance of an alleged violation of law by Applicant; therefore, we respectfully ask that the FRB consider its previous reviews of Applicant's business with respect to these matters. Comerica Bank remains today, as it has throughout its 170+ year history, committed to serving the communities in which it is located in a manner that not only complies with applicable laws, but actively supports and pursues fair lending and equal credit opportunities.

Community Reinvestment Act Concerns

In addition to unsupported claims of Applicant's alleged violation of fair lending and anti-discrimination laws, [REDACTED] also asserts, without support, that Applicant has failed to provide sufficient community development loans and sufficiently invest in low-to-moderate income ("LMI") geographic areas. We note that in Applicant's most recent CRA examination, we received an overall rating of "Satisfactory," and specifically, Applicant's lending, investment, and service performance tests were all rated "High Satisfactory."

- Lending Performance. With respect to lending performance, the FRB noted that Applicant's "lending activity reflects good responsiveness to assessment areas' credit needs," and noted that Applicant "makes a relatively high number of community development loans and services" and provides lending services to LMI borrowers and small business through a combination of participation in government-sponsored lending programs (such as FHA, VA, SBA), in addition to its own small business lending programs.
- Investment Performance. With respect to investment performance, the FRB noted that Applicant had "an excellent level of qualified community development investments and grants," and in this area, "Comerica is often in a leadership position."
- Service Performance. With respect to service performance, the FRB noted that Applicant's retail and community development services "reflect good responsiveness to the needs of the assessment areas," and the Applicant's record of opening and closing branches does not adversely impact the accessibility of services or systems, particularly to LMI customers and communities. The FRB also recognized the commitment by Applicant's employees, including directors, executives, and senior officers, to providing community development services in all states where Applicant provides banking and financial services, including participation in financial literacy programs in LMI communities.

Application to Establish a New Branch – 4145 Cooper St., Arlington, Tarrant County, Texas 76015 (the "New Branch")

As you are aware, Applicant filed an application with respect to the New Branch on November 9, 2022, with the Federal Reserve Bank of Dallas and the Texas Department of Banking. The New Branch is scheduled to open in the first quarter of 2023 and will be located .30 miles from a prior branch located at 4200 Cooper Street, Arlington, Tarrant County, Texas 76015. The prior branch closed effective September 30, 2022 due to ongoing facility issues that made the branch premises uninhabitable for business. The New Branch will be located in the same assessment area and will service the same

Comerica Bank

community as the prior branch. We also note that the assessment area is a moderate/high minority census tract.

In addition to the strong overall CRA performance noted in the Applicant's last examination, we specifically note that the FRB found Applicant's lending, investment, and service performance in the Dallas/Ft. Worth assessment area to be strong and responsive to community needs. With respect to HMDA-reportable loans, the FRB found that since 2018, Applicant has consistently outperformed other lenders in the aggregate in terms of the percentage of its HMDA-reportable loans to LMI borrowers. The FRB also noted that 32.7% of Applicant's full-service branches and 27.1% of ATMs in the Dallas/Ft. Worth assessment area are in LMI areas.

Finally, since our relocation to Dallas in 2007, we have committed to serving our local neighbors in LMI areas through not only our banking business but also through partnerships with community organizations. Most recently, we announced the formation of a business banking team to serve the South Dallas community, as well as the development of a community resource center called Comerica BusinessHQ, which will utilize idle real estate owned by Applicant to provide a space for small businesses to incubate, develop, and grow. Attached are press releases and a public report on Applicant's activities in serving the South Dallas community.

In summary, for the reasons set forth in this letter, we believe [REDACTED] assertions in his November 21 letter are unsupported by facts. We respectfully request that the FRB dismiss [REDACTED] assertions and allow the application for the New Branch to continue without undue delay.

Sincerely,

[REDACTED]

Irvin Ashford, Jr.
SVP, Chief Community Officer

Cc: Mr. [REDACTED] – [REDACTED] (via CAFÉ)
Mr. [REDACTED] – [REDACTED] (via email)

Comerica Bank

COMERICA BANK

COMMUNITY UPDATE

SOUTH DALLAS SPOTLIGHT



www.comerica.com/cra



IRVIN ASHFORD, JR.
Chief Community Officer

This past year, we have faced a truly unprecedented time in history. The COVID-19 pandemic, natural disasters and social justice issues have affected lives, communities and businesses in a profound way. Comerica remains committed to providing support to those that have been impacted and we are dedicated to improving the communities we serve.

Texas Winter Weather Event

In early 2021, our Texas family faced challenging winter weather conditions that further disrupted the lives of so many throughout the state. In response, Comerica Bank and the Comerica Charitable Foundation donated \$85,000 in contributions to support relief efforts associated with this devastating event, and we continue to work with our customers and community partners to provide support for their long-term recovery efforts.

South Dallas Focus

At Comerica, we recognize that our success is intertwined

with the prosperity of the communities we serve. In our South Dallas community, it is more important than ever that we support our local businesses and customers and nonprofit agencies that are providing critical products and services to the community.

This Community Update spotlights our commitment to South Dallas by providing a brief history of South Dallas initiatives we have supported, highlights several of our South Dallas community partners, and offers a glimpse of our service to South Dallas and the lasting impact of our dedicated volunteers.

SNAPSHOT



South Dallas Banking Centers



invested in nonprofit organizations located in South Dallas since 2019



colleagues work in South Dallas



colleagues live in South Dallas



business customers in South Dallas



personal banking customers in South Dallas



companies in South Dallas that received Paycheck Protection Loans (PPP)



in total PPP Loans for South Dallas companies



colleague volunteer hours since 2007 in South Dallas

**As of March 1, 2021, unless otherwise noted*



BRIEF HISTORY

Comerica relocates corporate headquarters to Dallas, Texas



2007



Comerica partners with seven nonprofits in South Dallas to host Financial Literacy workshops



2011



Comerica invests \$50,000 in Financial Literacy Collection and unveils a new African American Literature Collection for Dallas Public Library system



Comerica invests \$50,000 into the GrowSouth Education Investment Plan

2019



Comerica's Brandon Jones serves on the City of Dallas Diversity Task Force's Insurance and Finance Committee to help make recommendations on access to capital and insurance needs that will help the city achieve its diversity goals



2021

growSouth



Comerica among first institutions to join Grow South Initiative

Comerica Bank announces its title sponsorship of "Celebrate Downtown" New Year's Parade



Photo by: By T. C. - originally posted to Flickr as Comerica Bank New Year's Parade 21, CC BY-SA 2.0, <https://commons.wikimedia.org/w/index.php?curid=10370858>



Comerica Bank's financial education program, the Gift of Knowledge expands its reach through a partnership with the City of Dallas and two local nonprofits



Comerica makes an investment of \$250,000 to the City of Dallas' COVID-19 Small Business Fund



COMMUNITY PARTNERS

EMPOWER Series Inc. Education

EMPOWER Series, Inc., is a nonprofit organization formed in 2015 to inspire people to thrive in every area of their life and provides financial coaching, financial literacy and personal development workshops to Dallas-area individuals with an emphasis in the South Dallas area. The workshops encourage participants to make positive life choices that lead to the assertion of financial and personal goals. EMPOWER programs are free and open to the general public but target under-served individuals. With Comerica's support, the EMPOWER webinars have been able to pivot to an online format and continue to provide services in a safe matter.



Project Still I Rise Education

Project Still I Rise (PSIR) is a community-based nonprofit organization founded in 2002. The mission of the agency is to empower today's youth for tomorrow's opportunities through academic enrichment, mentoring and leadership development programming. Through the "Gift of Knowledge" program, Comerica is able to help hundreds of students in South Dallas gain access to school supplies and educational technology, as well as launch PSIR's first ever Virtual Summer Camp.



Kym's Kids Human Services

Kym's Kids was established in 1994 to help abused, neglected and low- to moderate-income (LMI) children and families. The nonprofit offers year-round mentoring, tutoring, a food pantry (which distributes about 1,000 pounds per month), low-income housing, field trips to cultural events, books, school supplies/uniforms, clothing, furniture and vehicle donations. With Comerica's support, Kym's Kids was able to provide food and Personal Protective Equipment to hundreds of South Dallas children.



COMMUNITY PARTNERS

Harmony Community Development Corporation Economic/Community Development

Harmony Community Development Corporation, established in 2001 is a catalyst for transforming communities to become whole and empowered. The organization was organized to stimulate the development of affordable housing, create business ownership and employment opportunities, combat crime, increase social services and provide other charitable and educational services in our community. Harmony targets residents of the South Oak Cliff area of Dallas with additional concentration throughout the southern sector of Dallas including Cedar Hill, DeSoto, Duncanville, and Lancaster. With Comerica's support Harmony is able to assist thousands of South Dallas residents through the provision of job placement, housing assistance and PPE.



The Dallas Entrepreneur Center Economic/Community Development

Located in South Dallas' Redbird community, the Dallas Entrepreneur Center (DEC) Network is a nonprofit organization driving innovation and economic impact by helping entrepreneurs start, build and grow their businesses. With a innovation hubs across Dallas/Fort Worth, the DEC provides expert education, access to knowledgeable mentors and a vibrant community of like-minded entrepreneurs. In 2020, Comerica invested \$250,000 in the DEC's COVID-19 Small Business Relief Fund that helps minority and small business owners whose business has been significantly affected by COVID-19. Comerica has also partnered with the DEC to host 16 Business \$ense Bootcamp sessions with the organization over the past several years.

BUSINESS RESOURCE GROUPS

Comerica's Business Resource Groups play an integral role in its commitment to supporting the health and economic development of South Dallas. In just the last two years, Comerica's Business Resource Groups have provided thousands of dollars in support of the following organizations.

African American Museum of Dallas

Comerica provided program support to maintain and expand educational offerings through exhibitions, significant programs, workshops, lectures and other educational services that will facilitate awareness and understanding of African American history and culture. Comerica presented the Comerica Money \$ense program as a component of the summer STEAM initiative "Science of Art." The African American Museum of Dallas offers the program on scholarship to LMI students who qualify for free and reduced lunch. About 83% of the students served through the African American Museum through its Science of Art STEAM Summer are LMI.

For Oak Cliff

Comerica supports educational programming responsive to the needs of the community, like the Pre-K through grade 12 academic enrichment program's transition to online due to COVID-19. For Oak Cliff provides culturally responsive initiatives in South Oak Cliff to liberate the community from systemic oppression, create a culture of education, and increase social mobility and social capital.

Regional Hispanic Contractors Association (RHCA)

Through RHCA, Comerica supports the men and women of the construction industry who have stepped up by continuing to deliver projects while meeting changing demands and regulations. RHCA provides resources and assistance to those that have had to pivot their services during the COVID-19 pandemic

Mount Auburn Parents and Community for Kids

Comerica has invested in classroom supplies for Mount Auburn Elementary School where more than 50% of the students in attendance are from LMI households.

NAACP Dallas

The NAACP Dallas has a commitment to those within low and moderate socio-economic communities. Comerica supports the NAACP ACT-SO (Afro-Academic Cultural Technological Scientific Olympics) and Youth Council focus on leadership development, as well as academic achievement that prepares students in STEM, cultural and financial education preparing them to compete in a global and competitive society. The Dallas NAACP ACT-SO program primarily serves that Dallas Independent School District where 84% of the students are from LMI households.

Dallas Black Chamber of Commerce and Greater Dallas Hispanic Chamber of Commerce

Through its corporate membership, Comerica supports business development and growth in the Dallas African American and Hispanic/Latino communities and South Dallas.



AFRICAN AMERICAN
MUSEUM



SERVICE



- In 2020, Comerica partnered with the Hear My Cry Foundation to host a free community mental health and pandemic drive through event in South Dallas. Volunteers handed out essential COVID-19 relief supplies, mental health items and groceries.

The Hear My Cry Foundation is a 501(c)(3) charitable organization that was founded upon a mission to address the growing epidemic of suicide impacting communities and the under-served populations through programs and services.

- Last year, Comerica colleagues teamed up with local banking centers to donate a surplus of unused PPE items to Mount Auburn Elementary in Dallas. The team was able to collect and donate:
 - 9 large tubs of wipes
 - 8 large bottles of sanitizers
 - 10 boxes of gloves (various sizes)
 - 12 boxes of masks, 100 bottles of personal size hand sanitizer

In addition to the donation of PPE items, Comerica presented the school with a check to purchase additional school supplies and PPE items for students and staff.



- In 2020, Comerica colleagues taught several financial education sessions for the Wilkinson Center. The financial education sessions focused on topics like work readiness and elder fraud.

The Wilkinson Center mission is to transform the lives of Dallas families by providing pathways to self-sufficiency with dignity and respect. They fulfill their mission by helping families face critical life challenges including food insecurity, lack of education, economic instability, unemployment and underemployment. All programs are provided free of charge to the community.

- In 2020, Comerica colleagues taught work readiness sessions to students participating in Mountain View College's BankWork\$@ program. The BankWork\$@ to train the next generation of bank employees. BankWork\$@ is an entirely free, eight-week program that prepares individuals for a career in the financial sector. The program covers essential skills and information needed to succeed in the financial sector such as business etiquette, money handling procedures and banking regulations.





Comerica®

News Releases

Comerica Bank Creates Business Banking Team to Serve Southern Sector of Dallas County

DALLAS, Sept. 20, 2022 /PRNewswire/ -- [Comerica Bank](#) has named **Trent Sampson, Jerry Collazo** and **Adriana Najera** to its newly-formed South Dallas Business Banking Team led by Group Manager Derric Hicks.

"As the leading bank for business, it is imperative that we raise expectations in all the communities where we live and serve," said Comerica Bank Dallas Market President Amanda Mahaney. "For many years, we have provided retail banking services and made community investments in the South Dallas community. Now, Derric and his team will focus on finding access to capital solutions for underserved entrepreneurs and small businesses."



Hicks, who joined the bank earlier this year, said he assembled a team that best represented the diverse communities the team will serve.

"This firm foundation will help our team build trust and cultivate key relationships as we continuously work to bridge the financial gap between conventional lending and meeting the needs of businesses in our footprint."

Sampson, who will serve as the DFW South Senior Relationship Manager, has been a fixture in the North Texas commercial banking community as well as at Comerica for more than 25 years. The Southern (La.) University graduate earned a bachelor's degree in finance and economics, and later completed his studies at Southern Methodist University Southwestern Graduate School of Banking. Sampson volunteers for the North Texas Food Bank and teaches personal finance courses in low- to moderate-income communities as a member of Comerica's Financial Education Brigade.

Collazo, a Business Banking Relationship Manager, has worked in banking for more than 15 years. A graduate of the University of Texas at Arlington, he holds a Bachelor of Science degree in Criminology with a minor in Spanish. Collazo is active in the community, participating in financial education panels for SCORE in Dallas and Fort Worth and the Dallas Mexican Consulate Office.

Najera has assumed the role of senior lending assistant after working as a member of Comerica's retail banking team for close to three years. In addition to her day-to-day responsibilities, Najera is a member of Comerica's North Texas Women's Forum and Mi Gente employee resource groups (ERG), designed to recruit and retain talent as well as provide personal and professional development opportunities among women and Latino employees, respectively.

The South Dallas Business Banking team is based in Comerica's R.L. Thornton building (5201 E. R L Thornton; Dallas, TX 75223).

Comerica Incorporated (NYSE: CMA) is a financial services company headquartered in Dallas, Texas, and strategically aligned by three business segments: The Commercial Bank, The Retail Bank and Wealth Management. Comerica focuses on relationships, and helping people and businesses be successful. In addition to Texas, Comerica Bank locations can be found in Arizona, California, Florida and Michigan, with select businesses operating in several other states, as well as in Canada and Mexico. Comerica reported total assets of \$86.9 billion as of June 30, 2022.

SOURCE Comerica Bank

For further information: Carmen Branch, 214-462-6681

News Releases

Comerica Bank Creates Collaborative Community Space to Support Small Businesses in Dallas' Southern Sector

BusinessHQ will empower Comerica's community partners to deliver critical services to small businesses in high need, high opportunity areas.

DALLAS, Dec. 8, 2022 /PRNewswire/ -- [Comerica Bank](#) today revealed plans for **Comerica BusinessHQ**, a collaborative space that will provide integral services and value to small businesses in the Southern sector of Dallas.



Comerica is transforming idle real estate on the first floor of its R.L. Thornton location into a unique community resource that provides high-need, high-opportunity small businesses with the necessary tools to develop, grow and endure. Through a mix of coworking spaces, incubation fellowships and technical assistance, Comerica BusinessHQ will address the three essential needs of aspiring small businesses: capital, cultivation and connectivity.

"Comerica has long been invested in the South Dallas community, and we are taking our commitment a step further with the creation of Comerica BusinessHQ," said Irvin Ashford, Jr., Comerica Bank's Chief Community Officer. "It is imperative that we help provide solutions to the challenges facing entrepreneurs in this footprint."

BusinessHQ will function as a part of the Dallas Small Business Ecosystem and serve as an epicenter of vetted, credible community partners to present effective and impactful small business incubation and technical assistance. The project lead, Regional External Affairs Manager Brandon Q. Jones, has secured a growing roster of partners that includes Community Incubation Partner the Veteran Women's Enterprise Center (VWEC), as well as BCL of Texas, the City of Dallas, Dallas Black Chamber of Commerce, DreamSpring, Impact Ventures, National Youth Chamber of Commerce powered by Project Still I Rise, Philippine-American Chamber of Commerce of Texas DFW, State Fair of Texas, and the United Way of Metropolitan Dallas.

"To ensure this initiative is truly community-driven, we plan to empower our broad network of strategic community partners to facilitate programming and assist in identifying small businesses for BusinessHQ opportunities," said Jones. "The key findings from our community-based focus groups and meetings with local leaders, stakeholders and small business owners, indicated we should focus on the following areas – technology and connectivity, access and security and membership and exclusivity – to make the most impact as we continue to contribute to the Southern sector's economic revitalization efforts."

Essential features

- **Technology and connectivity** – The space will have free, flexible, temporary workspaces and turnkey access to high-speed, uninterrupted Wi-Fi; information security and privacy; printing; scanning; large scale projection video conferencing rooms; as well as space furnished with equipment for small-scale content creation needs. Technical assistance services also will be offered, which will be open to all small businesses and led by a strategic community partner.
- **Access and security** – BusinessHQ will be in a secure location and open Monday through Friday with extended hours and some weekend hours to reflect the reality of entrepreneurs.
- **Membership and exclusivity** – There will be a conscientious registration and vetting process for small businesses to gain access and membership to BusinessHQ.

BusinessHQ membership opportunities

- **Incubators** – BusinessHQ Community Partner VWEC will select small businesses for membership and administer the program. Incubators will receive dedicated/private office space, one-on-one cultivation support and consultations with small business capital providers, and exclusive access to the content creation studio.
- **Coworkers** – Strategic community partners will refer small businesses that are enrolled in or have completed formal technical assistance training. These entities will have access to private and/or shared office space or open workspace twice a week (subject to availability), one-on-one consultations with small business capital providers and exclusive access to the content creation space.

- **Community Coworkers** – Any small business operating in a high need, high opportunity area, with revenues less than \$1 million, will have the opportunity to take advantage of the space. A BusinessHQ staff member will meet with a small business that is requesting access to help identify key need areas. Once a membership is confirmed, the community coworker can use shared, open workspaces (subject to availability) and BusinessHQ's library of resources for six months.

All small businesses utilizing BusinessHQ can grow as members and gain access to more benefits once the initial duration of their membership has ended.

More on BusinessHQ

A Comerica BusinessHQ Success Manager will oversee general operations of the community center, which will include client scheduling, event planning and membership operations.

The approximately 8,000-square-foot area, located at 5201 E. R.L. Thornton, is currently undergoing renovations. When it reopens in March 2023, it will have clear, engaging signage illuminated with blue lights at night.

Comerica Incorporated (NYSE: CMA) is a financial services company headquartered in Dallas, Texas, and strategically aligned by three business segments: The Commercial Bank, The Retail Bank and Wealth Management. Comerica focuses on relationships, and helping people and businesses be successful. In addition to Texas, Comerica Bank locations can be found in Arizona, California, Florida and Michigan, with select businesses operating in several other states, as well as in Canada and Mexico. Comerica reported total assets of \$84.1 billion as of Sept. 30, 2022.

SOURCE Comerica Bank

For further information: MEDIA CONTACT: Carmen Branch, (214) 462-6681

**COMERICA BANK
BANKING CENTER LOCATIONS
FL CRA ASSESSMENT AREAS
AS OF 4/1/2024**

MSA Name	CRA Name	Branch	Location	Address	City, State, Zip	County	Census Tract	Income Level	Minority*
MIAMI-FT LAUDERDALE-WEST PALM BEACH	FORT LAUDERDALE-WEST PALM BEACH	814	Singer Island Bridge	155 E Blue Heron Blvd	Riviera Beach, FL 33404	PALM BEACH	0015.00	MODERATE	Y
MIAMI-FT LAUDERDALE-WEST PALM BEACH	FORT LAUDERDALE-WEST PALM BEACH	806	Palm Beach Gardens	2401 PGA Blvd	Palm Beach Gardens, FL 33410	PALM BEACH	0003.04	MIDDLE	N
MIAMI-FT LAUDERDALE-WEST PALM BEACH	FORT LAUDERDALE-WEST PALM BEACH	811	Wellington	1037 State Road 7	Wellington, FL 33414	PALM BEACH	0077.63	MIDDLE	Y
MIAMI-FT LAUDERDALE-WEST PALM BEACH	FORT LAUDERDALE-WEST PALM BEACH	817	East Boca	1 S Federal Hwy	Boca Raton, FL 33432	PALM BEACH	0075.05	UPPER	N
MIAMI-FT LAUDERDALE-WEST PALM BEACH	FORT LAUDERDALE-WEST PALM BEACH	805	Broward-NE Third	100 NE 3rd Ave	Ft. Lauderdale, FL 33301	BROWARD	0425.01	UPPER	N
NAPLES-MARCO ISLAND	NAPLES	474	GoMerica Mobile Bank	7500 Davis Blvd	Naples, FL 34104	COLLIER	0105.18	UPPER	N
NAPLES-MARCO ISLAND	NAPLES	802	Naples	3001 Tamiami Trl N	Naples, FL 34103	COLLIER	0003.01	UPPER	N
TOTAL NUMBER OF BANKING CENTERS: 7									

Florida Banking Center Hours as of 4.1.2024

BC#	BC Name	Address	City	State	Zip Code	Lobby Mon-					
						Thurs	Lobby Fri	Lobby Sat	DT Mon-Thurs	DT Fri	DT Sat
474	gomerica Mobile Bank	7500 Davis Blvd.	Naples	FL	34104	1-4	1-4	N/A	BConn 9-5	BConn 9-5	Closed
802	Naples	3001 Tamiami Trail, Ste 100	Naples	FL	34103	9-4:30	9-5	Closed	N/A	N/A	N/A
805	Broward-NE Third	100 NE 3rd Ave., Ste 100	Fort Lauderdale	FL	33301	9-4:30	9-5	Closed	N/A	N/A	N/A
806	Palm Beach Gardens	2401 PGA Blvd., Ste 198	Palm Beach Gardens	FL	33410	9-4:30	9-5	Closed	N/A	N/A	N/A
811	Wellington	1037 State Rd. 7, Ste 117	Wellington	FL	33414	9-4:30	9-5	Closed	N/A	N/A	N/A
814	Singer Island Bridge	155 E. Blue Heron Blvd., Ste. 100	Riviera Beach	FL	33404	9-4:30	9-5	Closed	9-4:30	9-5	Closed
817	East Boca	1 S. Federal Hwy	Boca Raton	FL	33432	9-4:30	9-5	Closed	N/A	N/A	N/A

Banking Centers Opened or Closed

A list of banking officers opened or closed during the current year and each of the prior two calendar years, their street addresses, and the census tract in which they are (were) located.

No Openings

**COMERICA BANK
BANKING CENTERS CLOSED
FL CRA ASSESSMENT AREAS
JANUARY 1, 2022 - APRIL 1, 2024**

MSA Name	CRA Name	Branch	Location	Address	City, State, Zip	County	Census Tract	Income Level	Minority*	Year Closed
MIAMI-FT LAUDERDALE-POMPANO BEACH	FORT LAUDERDALE-WEST PALM BEACH	804	Boca Raton	1675 N Military Trail	Boca Raton, FL 33486	PALM BEACH	0076.22	UPPER	N	2023

TOTAL NUMBER OF BANKING CENTERS CLOSED: 1

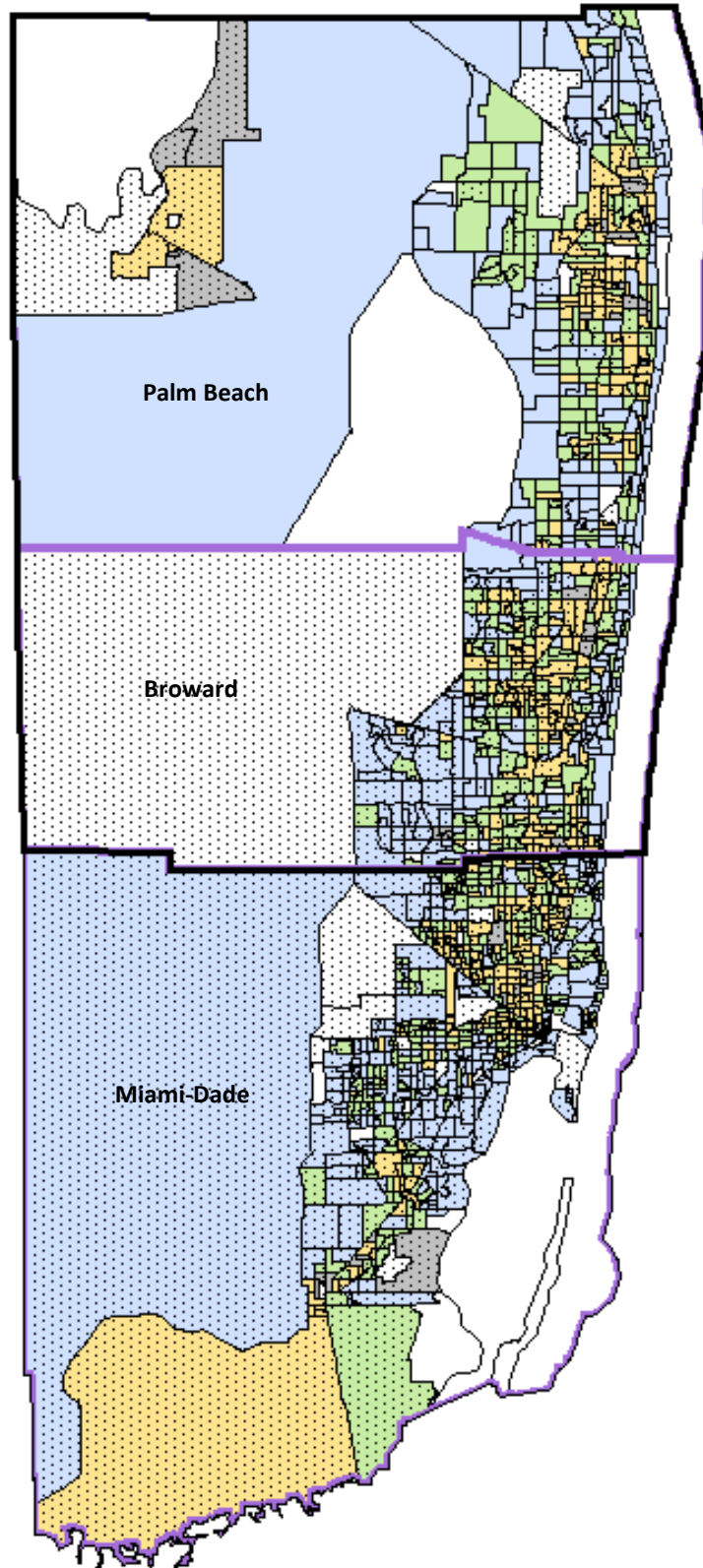
Product/Service (2023)	2023 Fee Reference Materials & Fee Information
Account Activity Printouts	Personal Services and Charges brochure[i]
Account Activity Printouts	Business Account Service Charge and Interest Information brochure[ii]
Account Balance Fee (formerly FDIC Charge)	Business Account Service Charge and Interest Information brochure[ii]
Account Maintenance Fee	Personal Services and Charges brochure[i]
Account Maintenance Fee	Business Account Service Charge and Interest Information brochure[ii]
Account Reconciliation & Research	Personal Services and Charges brochure[i]
ACH Intl Transactions Received	Business Account Service Charge and Interest Information brochure[ii]
ACH Return Item Request	Business Account Service Charge and Interest Information brochure[ii]
Activity Fee	Personal Services and Charges brochure[i]
Activity Fee	Business Account Service Charge and Interest Information brochure[ii]
Automated Teller Machines (ATM) Transactions:	Personal Services and Charges brochure[i]
Automated Teller Machines (ATM) Transactions:	Business Account Service Charge and Interest Information brochure[ii]
Balance Inquiries	Personal Services and Charges brochure[i]
Business Sweep Account	Business Account Service Charge and Interest Information brochure[ii]
Cash & Coin Orders	Business Account Service Charge and Interest Information brochure[ii]
Cash/Items Deposited	Business Account Service Charge and Interest Information brochure[ii]
Cashier's Check	Personal Services and Charges brochure[i]
Cashier's Check	Business Account Service Charge and Interest Information brochure[ii]
Check Cashing	Personal Services and Charges brochure[i]
Check Cashing	Business Account Service Charge and Interest Information brochure[ii]
Check Ordering/Printing	Cost varies by market, relationship pricing, and check style.
Check Reject Fee	Personal Services and Charges brochure[i]
Check Reject Fee	Business Account Service Charge and Interest Information brochure[ii]
Check Safekeeping	Personal Services and Charges brochure[i]
Checking Accounts and Related Services (Personal)	Personal Services and Charges brochure[i]
Checking Accounts and Related Services (Business)	Business Account Service Charge and Interest Information brochure[ii]
CheckPhoto	Personal Services and Charges brochure[i]
Coin Deposits/Vault Processing	Personal Services and Charges brochure[i]
Coin Deposits/Vault Processing	Business Account Service Charge and Interest Information brochure[ii]
Coin Rolls Provided	Business Account Service Charge and Interest Information brochure[ii]
Collections	Personal Services and Charges brochure[i]
Collections	Business Account Service Charge and Interest Information brochure[ii]
Combined Statement (Personal Accounts Only)	No Fee
Continuous Overdraft Fee	Personal Services and Charges brochure[i]
Copy of Check/Item/Statement	Personal Services and Charges brochure[i]
Copy of Check/Item/Statement	Business Account Service Charge and Interest Information brochure[ii]
Counter Checks	Personal Services and Charges brochure[i]
Counter Checks	Business Account Service Charge and Interest Information brochure[ii]
CPA Balance Verification	Business Account Service Charge and Interest Information brochure[ii]
Debit/Credit Fee	Personal Services and Charges brochure[i]
Debit/Credit Fee	Business Account Service Charge and Interest Information brochure[ii]
Deposit Error Correction	Business Account Service Charge and Interest Information brochure[ii]
Direct Deposit Acceptance- Retail and Business	No fee for service. For transaction fees refer to: Business Account Service Charge and Interest Information brochure[ii]
Electronic Funds Transfers (EFT) Debits & Credits	Personal Services and Charges brochure[i]
Electronic Funds Transfers (EFT) Debits & Credits	Business Account Service Charge and Interest Information brochure[ii]
Escheatment Notification	Personal Services and Charges brochure[i] Note: Applies to Western Market only
eStatement/Paper Statement Suppression Discount	Personal Services and Charges brochure[i]
Excess Withdrawal Fee	Personal Services and Charges brochure[i]
Exit Fee (IRA) (through 2/28/15)	Personal Services and Charges brochure[i]
IRA Transfer Fee (effective 3/1/15)	
Foreign Check(s)/ Processing	Personal Services and Charges brochure[i]
Foreign Check(s)/ Processing	Business Account Service Charge and Interest Information brochure[ii]
Foreign Drafts	Personal Services and Charges brochure[i]
Foreign Drafts	Business Account Service Charge and Interest Information brochure[ii]
Check & Save (Transfers)	Check and Save Transfer Request Form includes customer disclosure/no fee for setting up check and save
Mortgage Loans ~ Government - FHA	No change, but removed the language in red. The product was launched in 2018.
Money Market Investment Accounts	Personal Services and Charges brochure[i] Business Account Service Charge and Interest Information brochure[ii]
Mobile Banking - "Downloadable" Application (Includes Remote Deposit Capture) o Android, iPhone, iPad, Android tablet - Mobile Web Browser - Text Banking - Alerts (included within Mobile Banking)	
Comerica Rewards Card	Corporate Order Forms, KYC Form and Cardholder Terms and Conditions [xvii]
Small Business Loans and Lines (Business)	Fees are available on the SB Loan Rate Bulletin on Connect
Early Withdrawal Penalty (CD, ESA, IRA)	Personal Services and Charges brochure[i]
Comerica Credit Card: Consumer Visa Rewards and Non-Rewards Cards Small Business Mastercard Rewards and Non-Rewards Cards	Fees and disclosures are published by Elan in Elan Materials (e.g. application, terms and conditions)

Comerica ATM or Debit Cards (Personal and Business)	Personal Services and Charges brochure[i] Business Account Service Charge and Interest Information brochure[ii]
Bank by Mail	No fee; envelopes available in Banking Center Business Account Service Charge and Interest Information brochure[ii]
Bonds (Bearer US Treasury Bills, Notes Bonds, Municipal, Corporate and Church)	Refer to ("Collection Items"): Personal Services and Charges brochure[i] & Business Account Service Charge and Interest Information brochure[ii]; Business & Personal Deposit Contract
Discount Brokerage Service	No fee for consultation; banker makes referral to Comerica Securities/Ameriprise.
Foreign Bond Coupons	Refer to ("Collection Items"): Personal Services and Charges brochure[i] Business Account Service Charge and Interest Information brochure[ii]
Foreign Currency Account - Canadian Only	Comerica International Department for fee information
Quicken® Banking Quicken® Banking with Bill Pay LifeLock (Norton)	
Mortgage Loans ~ Conventional - Fixed Rate, Adjustable Rate, Interest Only; Affordable Housing programs	Mortgage uses two standard print on demand pieces that have campaign versions.
Consumer Loans - Auto, Boat, RV, Sport Vehicle - Personal Secured & Unsecured, Special Loans	Consumer Loans Product Guidelines [x]
Municipal Tax Acceptance	Michigan market only: certain City/County tax payments accepted
Municipal Water Bill Acceptance	Michigan market only: certain water payments accepted
Night Depository	Night deposit service fees may vary, refer to Night Deposit Agreement (CP03807). For transaction fees refer to: Business Account Service Charge and Interest Information brochure[ii]
Notary Fees	Personal Services and Charges brochure[i]
Online Banking - Comerica Web Banking® - Comerica Web Bill Pay® - Comerica Web Bill Pay® Overnight Check - Comerica External Transfer - Comerica Person-to-Person Transfer -eStatement	
Overdraft/Uncollected Funds Interest	Business Account Service Charge and Interest Information brochure[ii]
Pay Envelopes	Envelope for cash; manual fee for business customers who may request a box
Phone-Assisted Transaction Fee	No fee for service. For transaction fees refer to: Personal Services and Charges brochure[i]
Photocopies	Personal Services and Charges brochure[i]
Photocopies	Business Account Service Charge and Interest Information brochure[ii]
Rate Inquiries	No Fee
Relationship Pricing	No Fee
Research/Subpoena	Personal Services and Charges brochure [i] Business Account Service Charge and Interest Information brochure[ii]
Returned Item Handling - Returned Item Represented - Returned Item - Returned Item Re-Presented - Returned Item Fax Notification - Returned Item Additional Invoice	Business Account Service Charge and Interest Information brochure[ii]
Safe Deposit Box	Fees vary by market and location - fee disclosed at time of opening
Savings Accounts And Related Services -Comerica Web Pay Express -External Transfer -Comerica Web Invoicing	Personal Services and Charges brochure[i] Business Account Service Charge and Interest Information brochure[ii]
Signature Guarantee	No Fee
Special Statement Production/Handling	Personal Services and Charges brochure[i]
Special Statement Production/Handling	Business Account Service Charge and Interest Information brochure[ii]
Stop Payments	Personal Services and Charges brochure[i]
Stop Payments	Business Account Service Charge and Interest Information brochure[ii]
Telephone Transfers	Business Account Service Charge and Interest Information brochure[ii]
Time Deposits - Certificate of Deposit (CD)	Business and Personal Deposit Contract[xii] Business Account Service Charge and Interest Information brochure[ii]
Time Deposits - Education Savings Accounts (ESA)	Business and Personal Deposit Contract[xii] Business Account Service Charge and Interest Information brochure[ii] ESA Master Terms [xiii]
Time Deposits – Individual Retirement Account (IRA)	Business and Personal Deposit Contract[xiii] Business Account Service Charge and Interest Information brochure[ii] IRA Master Terms [xiv]
U.S. Savings Bonds - Encashment, Exchange	No charge to redeem. MI/FL - Reissue fee (thru Domestic Collections) = \$0.50/ 1st bond + \$0.10/each additional bond

Wire Transfers - Domestic - Incoming/Outgoing - Repetitive/Non-Repetitive - Automatic Standing Transfer - Book Transfer - Trace, Mail Advice, Cancel, Phone Notification, Fax Notification	Personal Services and Charges brochure[i]
Wire Transfers - Domestic - Incoming/Outgoing - Repetitive/Non-Repetitive - Automatic Standing Transfer - Book Transfer - Trace, Mail Advice, Cancel, Phone Notification, Fax Notification	Business Account Service Charge and Interest Information brochure[ii]
Wire Transfers - International - Incoming - Outgoing/Consumer (Personal Only) - Outgoing/Non-Consumer - Repetitive/Non-Repetitive (Non-Consumer Only) - Book Transfer - Trace, Mail Advice, Cancel, Phone Notification, Fax Notification	Personal Services and Charges brochure[i]
Wire Transfers - International - Incoming - Outgoing/Consumer (Personal Only) - Outgoing/Non-Consumer - Repetitive/Non-Repetitive (Non-Consumer Only) - Book Transfer - Trace, Mail Advice, Cancel, Phone Notification, Fax Notification	Business Account Service Charge and Interest Information brochure[ii]
Withdrawal Subject to Legal Process	Personal Services and Charges brochure[i]
Withdrawal Subject to Legal Process	Business Account Service Charge and Interest Information brochure[ii]
Zero Balance Account Service	Business Account Service Charge and Interest Information brochure[ii]
HELOC - FlexLine	Consumer Loans Product Guidelines [x] What You Should Know About Home Equity Lines of Credit [xviii]
Online Account Opening (Consumer)	No new fee information - we are reusing existing brochures
Small Business Convenient Capital Loans & Lines of Credit (CCap)	
Overdrafts (OD)	Personal Services and Charges brochure[i]

FORT LAUDERDALE-WEST PALM BEACH ASSESSMENT AREA

MIAMI-FT LAUDERDALE-POMPANO BEACH, FL MSA



Geography

- Assessment Area
- County

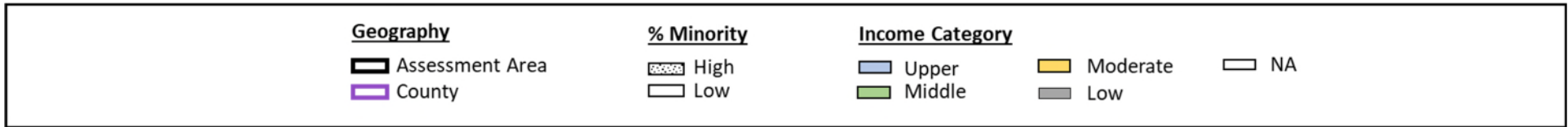
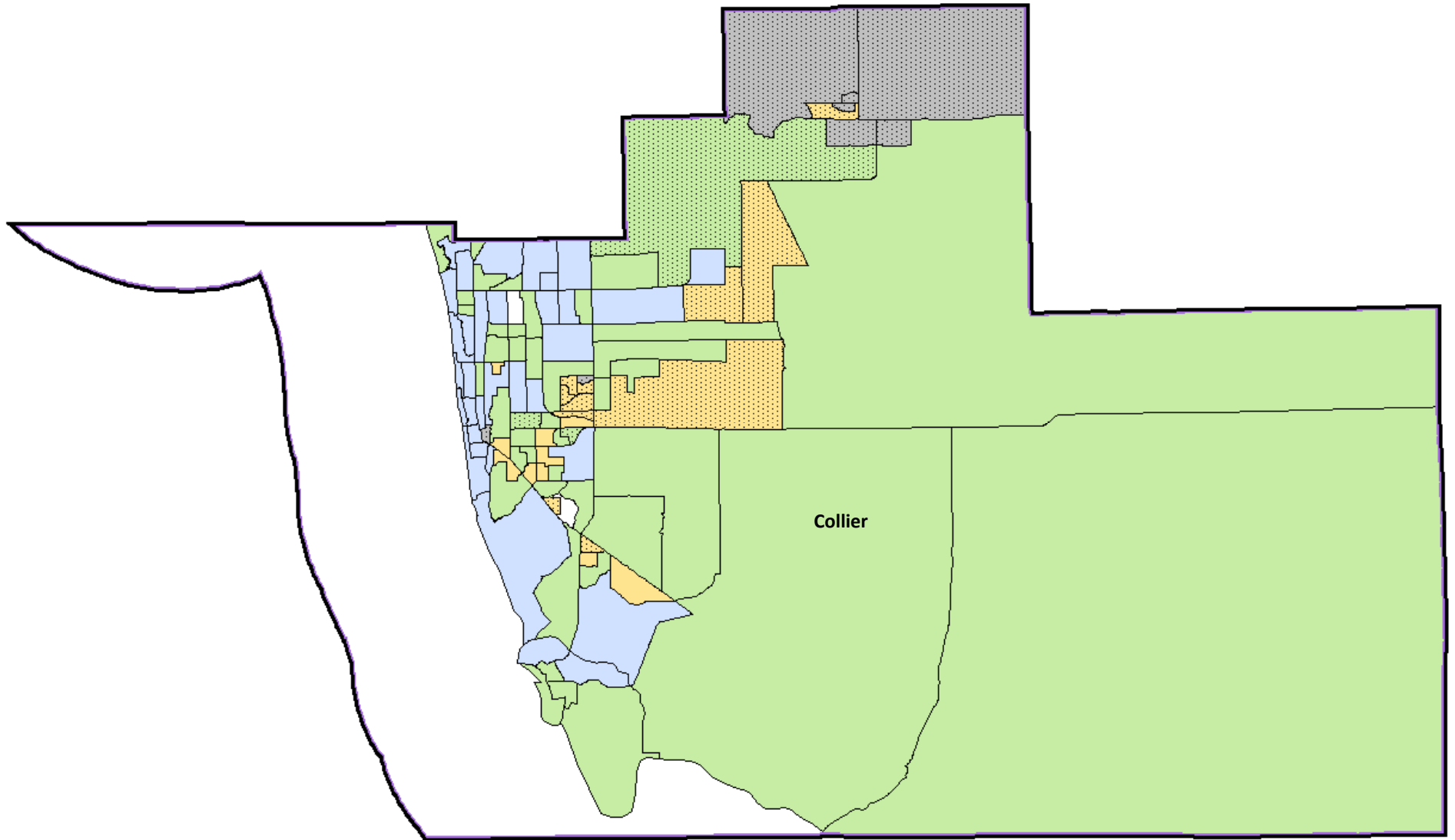
% Minority

- High
- Low

Income Category

- Upper
- Middle
- Moderate
- Low
- NA

NAPLES ASSESSMENT AREA—NAPLES-MARCO ISLAND, FL MSA



COMERICA BANK
CENSUS TRACT LISTINGS
FLORIDA
CRA ASSESSMENT AREA

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	011	0101.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0101.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0101.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0102.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0102.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0103.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0103.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0103.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0103.07	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0103.08	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0104.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0104.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0104.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0104.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0104.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0104.07	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0105.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0105.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0105.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0106.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0106.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0106.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0106.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0106.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0106.09	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0106.10	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0106.11	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0106.12	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0106.13	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0106.14	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0106.15	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0107.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0107.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0108.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0109.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0109.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0110.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0201.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0201.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y

*MINORITY: "Y" = 50% OR GREATER

COMERICA BANK
CENSUS TRACT LISTINGS
FLORIDA
CRA ASSESSMENT AREA

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	011	0201.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0202.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0202.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0202.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0202.09	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0202.10	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0202.11	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0202.12	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0202.13	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0202.14	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.08	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.09	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.11	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.12	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.13	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.14	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.15	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.16	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.17	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.18	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.19	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.20	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.21	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.22	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.23	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.24	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.25	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0203.26	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.07	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.12	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.14	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.15	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.16	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.17	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.18	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y

*MINORITY: "Y" = 50% OR GREATER

COMERICA BANK
CENSUS TRACT LISTINGS
FLORIDA
CRA ASSESSMENT AREA

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.19	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.20	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0204.21	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0205.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0205.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0301.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0302.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0302.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0302.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0303.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0303.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0304.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0304.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0305.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0306.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0306.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0307.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0307.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0307.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0307.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0308.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0308.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0308.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0308.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0309.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0309.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0309.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0310.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0310.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0311.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0311.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0312.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0312.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0312.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0312.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0312.07	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0401.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0401.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0402.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N

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COMERICA BANK
CENSUS TRACT LISTINGS
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	011	0402.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0402.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0402.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0403.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0404.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0404.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0405.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0405.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0405.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0405.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0406.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0406.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0407.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0407.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0408.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0408.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0409.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0409.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0410.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0411.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0412.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0413.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0414.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0415.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0416.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0416.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0417.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0418.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0418.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0419.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0420.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0421.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0422.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0423.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0423.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0424.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0425.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0425.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0426.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N

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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	011	0426.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0427.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0428.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0428.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0429.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0430.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0430.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0431.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0433.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0433.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0501.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0502.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0502.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0502.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0502.07	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0502.08	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0503.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0503.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0503.08	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0503.09	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0503.11	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0503.12	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0503.13	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0503.14	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0503.15	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0503.16	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0504.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0504.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0505.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0505.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0506.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0506.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0507.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0507.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0508.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0509.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0510.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0510.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y

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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.07	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.09	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.11	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.13	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.14	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.15	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.16	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.17	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.18	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.19	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.20	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.21	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.22	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.23	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.24	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.25	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.26	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.27	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.28	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.29	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0601.30	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0602.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0602.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0602.07	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0602.08	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0602.09	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0602.10	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0602.11	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0602.12	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0602.14	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0602.15	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0603.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0603.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0603.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0603.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0603.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0604.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0604.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0604.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y

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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	011	0604.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0605.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0605.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0605.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0605.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0606.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0606.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0606.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0606.07	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0606.08	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0606.09	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0607.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0608.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0608.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0609.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0610.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0610.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0610.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0611.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0701.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0701.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0701.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0702.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0702.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0702.08	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0702.09	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0702.10	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0702.11	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0702.12	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0702.13	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.10	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.11	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.12	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.14	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.15	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.16	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.18	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y

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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.19	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.20	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.21	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.23	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.24	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.25	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.26	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.27	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.28	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.29	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.30	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0703.31	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0704.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0704.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0704.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0704.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0704.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0705.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0705.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0705.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0706.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0706.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0801.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0801.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0801.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0801.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0802.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0804.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0804.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0804.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0804.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0805.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0901.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0901.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0901.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0902.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0903.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0903.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0903.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N

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COMERICA BANK
CENSUS TRACT LISTINGS
FLORIDA
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	011	0904.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0904.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0904.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0905.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0905.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0905.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0906.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0906.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0907.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0908.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0908.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0909.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0910.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0911.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0912.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0912.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0913.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0914.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0915.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0916.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0916.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0917.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0917.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0918.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0918.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0918.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0919.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	0919.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0919.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	0920.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	1001.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	1001.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	1001.05	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	1001.06	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	1001.07	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	1001.08	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	1002.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1002.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	N
FORT LAUDERDALE-WEST PALM BEACH	12	011	1002.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y

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COMERICA BANK
CENSUS TRACT LISTINGS
FLORIDA
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	011	1003.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1003.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1004.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1005.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1005.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1006.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1007.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1008.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1008.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1008.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1101.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.07	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.08	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.09	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.11	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.12	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.13	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.19	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.21	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.23	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.26	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.27	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.28	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.30	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.32	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.33	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.34	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.37	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.38	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.39	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.41	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.44	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.45	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.46	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.47	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.48	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.49	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	Y

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COMERICA BANK
CENSUS TRACT LISTINGS
FLORIDA
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.50	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.51	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.52	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.53	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.54	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.55	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.56	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.57	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.58	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.59	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.60	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.61	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.62	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.63	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.64	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.65	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.66	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.67	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1103.68	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1104.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1104.03	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1104.04	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1105.01	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1105.02	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	1106.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	9800.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	Y
FORT LAUDERDALE-WEST PALM BEACH	12	011	9900.00	22744	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	NA
FORT LAUDERDALE-WEST PALM BEACH	12	099	0001.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0001.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0001.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.08	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.10	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.11	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.13	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.14	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.16	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.17	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N

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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.18	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.19	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.20	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.21	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.22	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0002.23	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0003.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0003.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0003.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0004.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0004.06	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0004.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0004.08	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0004.10	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0005.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0005.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0005.09	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0005.12	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0005.13	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0006.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0007.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0007.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0008.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0008.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0009.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0009.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0009.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0009.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0010.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0010.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0010.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0011.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0011.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0012.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0013.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0013.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0014.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0014.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0014.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y

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FORT LAUDERDALE-WEST PALM BEACH	12	099	0015.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0016.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0017.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0018.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0018.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.09	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.10	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.11	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.12	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.13	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.16	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.17	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.18	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.19	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.20	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0019.21	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0020.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0020.06	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0021.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0022.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0023.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0024.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0026.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0027.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0027.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0027.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0028.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0029.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0030.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0031.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0031.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0032.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0032.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0033.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0034.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0035.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0035.12	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N

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FORT LAUDERDALE-WEST PALM BEACH	12	099	0035.13	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0035.14	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0036.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0037.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0038.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0038.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0039.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0039.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0040.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0040.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0040.08	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0040.09	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0040.10	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0040.11	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0040.12	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0040.13	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0041.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0041.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0042.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0042.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0042.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0042.06	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0042.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0043.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0044.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0044.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0045.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0046.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0046.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0047.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0047.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0047.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0047.06	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0048.10	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0048.13	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0048.15	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0048.16	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0048.17	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0048.18	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	N

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FORT LAUDERDALE-WEST PALM BEACH	12	099	0048.19	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0048.20	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0048.21	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0048.22	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0048.23	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0049.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0049.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0049.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0050.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0051.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0051.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0052.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0052.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0052.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0053.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0054.11	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0054.12	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0054.13	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0055.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0055.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0056.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0056.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0057.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0057.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0057.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0058.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0058.10	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0058.11	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0058.12	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0058.13	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0058.14	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0058.15	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0058.18	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0058.19	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0058.20	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0058.21	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.16	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.17	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.18	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y

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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.21	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.22	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.23	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.26	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.30	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.31	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.33	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.34	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.36	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.37	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.38	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.39	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.40	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.42	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.43	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.44	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.45	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.46	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.47	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.49	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.50	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.51	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.52	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.53	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.54	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.55	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.57	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.58	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.59	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.60	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0059.61	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0060.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0060.06	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0060.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0060.08	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0060.09	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0060.10	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0060.11	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0060.12	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N

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FORT LAUDERDALE-WEST PALM BEACH	12	099	0061.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0062.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0062.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0062.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0063.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0063.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0064.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0064.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0065.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0065.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0066.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0066.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0066.06	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0066.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0067.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0068.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0068.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0069.06	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0069.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0069.08	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0069.09	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0069.10	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0069.11	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0069.12	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0070.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0070.06	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0070.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0070.08	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0070.09	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0070.10	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0070.11	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0070.12	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0070.13	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0071.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0072.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0072.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0072.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0072.06	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0072.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N

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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	099	0072.08	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0073.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0073.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0074.07	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0074.10	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0074.12	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0074.14	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0074.20	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0074.21	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0075.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0075.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0075.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.04	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.10	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.12	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.13	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.14	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.15	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.16	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.19	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.20	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.21	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.22	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.23	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0076.24	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.10	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.16	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.21	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.23	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.24	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.25	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.30	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.31	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.32	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.35	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.36	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y

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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.38	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.39	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.40	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.41	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.42	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.43	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.46	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.47	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.48	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.49	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.50	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.51	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.52	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.54	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.57	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.58	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.59	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.63	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.64	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.66	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.67	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.68	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.69	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.70	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.71	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.72	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.73	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.74	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.75	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.76	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.77	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.78	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.79	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0077.80	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.05	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.12	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.13	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.14	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.18	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N

*MINORITY: "Y" = 50% OR GREATER

COMERICA BANK
CENSUS TRACT LISTINGS
FLORIDA
CRA ASSESSMENT AREA

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.20	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.21	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.23	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.30	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.31	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.32	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.33	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.34	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.35	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.37	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.38	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.40	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.41	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.42	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.43	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.44	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.45	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.46	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.47	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.48	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.49	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.50	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.51	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.52	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	NA
FORT LAUDERDALE-WEST PALM BEACH	12	099	0078.53	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0079.09	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0079.13	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0079.14	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0079.15	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0079.16	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0079.17	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	UPPER	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0079.18	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0079.19	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MIDDLE	N
FORT LAUDERDALE-WEST PALM BEACH	12	099	0080.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0080.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0081.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0081.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	NA
FORT LAUDERDALE-WEST PALM BEACH	12	099	0082.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0082.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y

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COMERICA BANK
CENSUS TRACT LISTINGS
FLORIDA
CRA ASSESSMENT AREA

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
FORT LAUDERDALE-WEST PALM BEACH	12	099	0082.03	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	LOW	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0083.01	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	0083.02	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	MODERATE	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	9800.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	NA
FORT LAUDERDALE-WEST PALM BEACH	12	099	9801.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	9802.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	Y
FORT LAUDERDALE-WEST PALM BEACH	12	099	9804.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	NA
FORT LAUDERDALE-WEST PALM BEACH	12	099	9805.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	NA
FORT LAUDERDALE-WEST PALM BEACH	12	099	9900.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	NA
FORT LAUDERDALE-WEST PALM BEACH	12	099	9901.00	48424	MIAMI-FT LAUDERDALE-POMPANO BEACH	NA	NA
NAPLES	12	021	0001.01	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0001.02	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0002.00	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0003.01	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0003.02	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0004.01	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0004.02	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0005.00	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0006.00	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0007.00	34940	NAPLES-MARCO ISLAND	LOW	Y
NAPLES	12	021	0101.02	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0101.07	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0101.08	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0101.09	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0101.10	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0101.11	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0101.12	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0101.13	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0101.14	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0102.05	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0102.08	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0102.09	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0102.10	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0102.11	34940	NAPLES-MARCO ISLAND	MODERATE	N
NAPLES	12	021	0102.13	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0102.15	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0102.16	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0102.17	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0103.00	34940	NAPLES-MARCO ISLAND	MIDDLE	N

*MINORITY: "Y" = 50% OR GREATER

COMERICA BANK
CENSUS TRACT LISTINGS
FLORIDA
CRA ASSESSMENT AREA

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
NAPLES	12	021	0104.01	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0104.08	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0104.11	34940	NAPLES-MARCO ISLAND	MODERATE	Y
NAPLES	12	021	0104.16	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0104.19	34940	NAPLES-MARCO ISLAND	MODERATE	Y
NAPLES	12	021	0104.20	34940	NAPLES-MARCO ISLAND	MODERATE	Y
NAPLES	12	021	0104.21	34940	NAPLES-MARCO ISLAND	MODERATE	Y
NAPLES	12	021	0104.22	34940	NAPLES-MARCO ISLAND	LOW	Y
NAPLES	12	021	0104.23	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0104.24	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0104.25	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0104.26	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0104.27	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0104.28	34940	NAPLES-MARCO ISLAND	MODERATE	Y
NAPLES	12	021	0104.29	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0104.30	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0104.31	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0104.32	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0104.33	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0104.34	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0104.35	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0104.36	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0104.37	34940	NAPLES-MARCO ISLAND	NA	N
NAPLES	12	021	0104.38	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0105.08	34940	NAPLES-MARCO ISLAND	MODERATE	N
NAPLES	12	021	0105.11	34940	NAPLES-MARCO ISLAND	MODERATE	N
NAPLES	12	021	0105.12	34940	NAPLES-MARCO ISLAND	MODERATE	Y
NAPLES	12	021	0105.13	34940	NAPLES-MARCO ISLAND	MIDDLE	Y
NAPLES	12	021	0105.14	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0105.15	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0105.16	34940	NAPLES-MARCO ISLAND	MODERATE	N
NAPLES	12	021	0105.17	34940	NAPLES-MARCO ISLAND	MODERATE	N
NAPLES	12	021	0105.18	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0105.19	34940	NAPLES-MARCO ISLAND	MIDDLE	Y
NAPLES	12	021	0105.20	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0106.01	34940	NAPLES-MARCO ISLAND	MODERATE	N
NAPLES	12	021	0106.02	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0106.04	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0106.05	34940	NAPLES-MARCO ISLAND	MODERATE	N

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COMERICA BANK
CENSUS TRACT LISTINGS
FLORIDA
CRA ASSESSMENT AREA

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
NAPLES	12	021	0106.06	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0107.01	34940	NAPLES-MARCO ISLAND	MODERATE	N
NAPLES	12	021	0107.02	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0108.01	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0108.04	34940	NAPLES-MARCO ISLAND	MODERATE	Y
NAPLES	12	021	0108.05	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0108.06	34940	NAPLES-MARCO ISLAND	NA	N
NAPLES	12	021	0108.07	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0108.08	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0109.02	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0109.04	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0109.05	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0109.06	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0109.07	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0110.03	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0111.03	34940	NAPLES-MARCO ISLAND	MODERATE	Y
NAPLES	12	021	0111.07	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0111.08	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0111.09	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0111.10	34940	NAPLES-MARCO ISLAND	MODERATE	N
NAPLES	12	021	0111.11	34940	NAPLES-MARCO ISLAND	MODERATE	N
NAPLES	12	021	0111.12	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0111.13	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0111.14	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0112.04	34940	NAPLES-MARCO ISLAND	LOW	Y
NAPLES	12	021	0112.05	34940	NAPLES-MARCO ISLAND	LOW	Y
NAPLES	12	021	0112.06	34940	NAPLES-MARCO ISLAND	MODERATE	Y
NAPLES	12	021	0112.07	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0112.08	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0112.09	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0112.10	34940	NAPLES-MARCO ISLAND	MIDDLE	N
NAPLES	12	021	0112.11	34940	NAPLES-MARCO ISLAND	MIDDLE	Y
NAPLES	12	021	0112.12	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0112.13	34940	NAPLES-MARCO ISLAND	UPPER	N
NAPLES	12	021	0112.14	34940	NAPLES-MARCO ISLAND	MODERATE	Y
NAPLES	12	021	0113.03	34940	NAPLES-MARCO ISLAND	LOW	Y
NAPLES	12	021	0113.04	34940	NAPLES-MARCO ISLAND	MODERATE	Y
NAPLES	12	021	0113.05	34940	NAPLES-MARCO ISLAND	LOW	Y
NAPLES	12	021	0113.06	34940	NAPLES-MARCO ISLAND	LOW	Y

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COMERICA BANK
CENSUS TRACT LISTINGS
FLORIDA
CRA ASSESSMENT AREA

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
NAPLES	12	021	0114.00	34940	NAPLES-MARCO ISLAND	LOW	Y
NAPLES	12	021	9900.00	34940	NAPLES-MARCO ISLAND	NA	NA

*MINORITY: "Y" = 50% OR GREATER

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
BROWARD COUNTY (011), FL										
MSA 22744										
Inside AA 0007										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	1	571	1	571	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	1	25	0	0	0	0	0	0	0	0
Median Family Income 70-80%	2	150	1	150	6	3,555	3	1,555	0	0
Median Family Income 80-90%	1	50	0	0	2	1,300	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	1	25	1	150	0	0	1	150	0	0
Median Family Income 110-120%	1	75	0	0	1	600	0	0	0	0
Median Family Income >= 120%	4	185	0	0	4	2,400	3	610	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	10	510	2	300	14	8,426	8	2,886	0	0
COLLIER COUNTY (021), FL										
MSA 34940										
Inside AA 0018										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	1	10	0	0	0	0	1	10	0	0
Middle Income	2	147	1	250	0	0	1	47	0	0
Upper Income	0	0	0	0	1	400	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	3	157	1	250	1	400	2	57	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
ESCAMBIA COUNTY (033), FL										
MSA 37860										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	25	0	0	1	750	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	25	0	0	1	750	0	0	0	0
HIGHLANDS COUNTY (055), FL										
MSA 42700										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	1	7	0	0	0	0	1	7	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	7	0	0	0	0	1	7	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
HILLSBOROUGH COUNTY (057), FL										
MSA 45300										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	1	80	0	0	0	0	0	0	0	0
Median Family Income 70-80%	1	25	0	0	0	0	1	25	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	1	25	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	1	75	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	4	205	0	0	0	0	1	25	0	0
INDIAN RIVER COUNTY (061), FL										
MSA 42680										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	1	300	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	300	0	0	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
LEE COUNTY (071), FL										
MSA 15980										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	1	200	2	1,300	2	1,300	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	1	60	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	1	250	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	1	100	0	0	1	1,000	0	0	0	0
Median Family Income Not Known	0	0	1	250	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	160	3	700	3	2,300	2	1,300	0	0
MARTIN COUNTY (085), FL										
MSA 38940										
Outside Assessment Area										
Low Income	1	50	0	0	1	268	1	50	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	1	250	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	50	1	250	1	268	1	50	0	0

Loans by County

Respondent ID: 000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
MIAMI-DADE COUNTY (086), FL										
MSA 33124										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	1	500	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	1	375	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	5	218	1	150	2	1,000	1	8	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	5	218	1	150	4	1,875	1	8	0	0

Loans by County

Respondent ID: 000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
ORANGE COUNTY (095), FL										
MSA 36740										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	1	50	1	250	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	50	1	250	0	0	0	0	0	0

Loans by County

Respondent ID: 000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
PALM BEACH COUNTY (099), FL										
MSA 48424										
Inside AA 0007										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	1	70	0	0	0	0	1	70	0	0
Median Family Income 40-50%	0	0	0	0	1	300	1	300	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	1	25	2	450	0	0	1	25	0	0
Median Family Income 70-80%	1	50	2	368	0	0	1	168	0	0
Median Family Income 80-90%	1	60	1	120	2	1,500	2	1,060	0	0
Median Family Income 90-100%	1	10	0	0	1	748	0	0	0	0
Median Family Income 100-110%	1	80	1	150	2	1,196	1	696	0	0
Median Family Income 110-120%	4	212	1	250	0	0	3	112	0	0
Median Family Income >= 120%	3	210	6	1,299	5	3,550	8	3,649	0	0
Median Family Income Not Known	6	355	0	0	3	2,183	2	820	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	19	1,072	13	2,637	14	9,477	20	6,900	0	0

Loans by County

Respondent ID: 000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
PINELLAS COUNTY (103), FL										
MSA 45300										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	1	1,000	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	1	100	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	1	250	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	100	1	250	1	1,000	0	0	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
POLK COUNTY (105), FL										
MSA 29460										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	1	304	1	304	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	0	0	3	1,750	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	4	2,054	1	304	0	0
ST. JOHNS COUNTY (109), FL										
MSA 27260										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	20	0	0	0	0	1	20	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	20	0	0	0	0	1	20	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
SARASOTA COUNTY (115), FL										
MSA 35840										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	2	120	0	0	2	1,300	1	100	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	120	0	0	2	1,300	1	100	0	0
SEMINOLE COUNTY (117), FL										
MSA 36740										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	5	0	0	0	0	1	5	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	5	0	0	0	0	1	5	0	0
TOTAL INSIDE AA IN STATE	32	1,739	16	3,187	29	18,303	30	9,843	0	0
TOTAL OUTSIDE AA IN STATE	20	960	7	1,600	17	9,847	10	1,819	0	0
STATE TOTAL	52	2,699	23	4,787	46	28,150	40	11,662	0	0

Loans by County

Respondent ID: 000060143

Small Business Loans - Purchases

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
BROWARD COUNTY (011), FL										
MSA 22744										
Inside AA 0007										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	1	8	0	0	0	0	0	0	0	0
Median Family Income 60-70%	2	22	0	0	0	0	2	22	0	0
Median Family Income 70-80%	2	43	0	0	0	0	2	43	0	0
Median Family Income 80-90%	1	4	0	0	0	0	1	4	0	0
Median Family Income 90-100%	1	16	0	0	0	0	1	16	0	0
Median Family Income 100-110%	1	16	0	0	0	0	0	0	0	0
Median Family Income 110-120%	1	13	0	0	0	0	0	0	0	0
Median Family Income >= 120%	3	42	0	0	0	0	0	0	0	0
Median Family Income Not Known	1	16	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	13	180	0	0	0	0	6	85	0	0

Loans by County

Small Business Loans - Purchases

Institution: COMERICA BANK

Respondent ID: 000060143

Agency: FRS - 2

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
PALM BEACH COUNTY (099), FL										
MSA 48424										
Inside AA 0007										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	1	13	0	0	0	0	0	0	0	0
Median Family Income >= 120%	3	43	0	0	0	0	1	6	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	4	56	0	0	0	0	1	6	0	0
TOTAL INSIDE AA IN STATE	17	236	0	0	0	0	7	91	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
STATE TOTAL	17	236	0	0	0	0	7	91	0	0

2022 Institution Disclosure Statement - Table 3
Assessment Area/Non-Assessment Area Activity
Small Business Loans
Institution: COMERICA BANK

Respondent ID: 0000060143
Agency: FRS - 2

ASSESSMENT AREA LOANS	Originations		Originations to Businesses with <= \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
MI - WASHTENAW COUNTY (161) - MSA 11460	131	31,238	46	10,311	0	0
TX - TRAVIS COUNTY (453) - MSA 12420	142	33,167	30	3,381	6	102
TX - WILLIAMSON COUNTY (491) - MSA 12420	28	5,640	10	1,195	8	93
TX - KERR COUNTY (265) - MSA NA	13	2,027	6	1,016	0	0
MI - CALHOUN COUNTY (025) - MSA 12980	54	15,477	19	2,483	0	0
TX - COLLIN COUNTY (085) - MSA 19124	107	30,708	39	9,260	0	0
TX - DALLAS COUNTY (113) - MSA 19124	435	124,210	114	21,941	8	99
TX - DENTON COUNTY (121) - MSA 19124	48	12,427	11	1,440	4	44
TX - ELLIS COUNTY (139) - MSA 19124	5	1,057	3	707	1	11
TX - ROCKWALL COUNTY (397) - MSA 19124	6	1,786	0	0	0	0
TX - TARRANT COUNTY (439) - MSA 23104	117	32,335	34	7,055	9	164
MI - GENESEE COUNTY (049) - MSA 22420	26	7,397	3	437	0	0
FL - BROWARD COUNTY (011) - MSA 22744	26	9,236	8	2,886	13	180
FL - PALM BEACH COUNTY (099) - MSA 48424	46	13,186	20	6,900	4	56
MI - KENT COUNTY (081) - MSA 24340	132	40,688	30	4,836	0	0
MI - OTTAWA COUNTY (139) - MSA 24340	42	13,686	9	2,586	0	0
CA - LOS ANGELES COUNTY (037) - MSA 31084	343	99,394	89	17,908	47	851
CA - ORANGE COUNTY (059) - MSA 11244	143	41,190	32	5,880	16	310
TX - BRAZORIA COUNTY (039) - MSA 26420	14	3,237	6	1,137	1	22
TX - FORT BEND COUNTY (157) - MSA 26420	51	14,283	19	3,315	4	56
TX - GALVESTON COUNTY (167) - MSA 26420	9	1,668	3	88	1	6
TX - HARRIS COUNTY (201) - MSA 26420	489	119,016	163	30,186	58	914
TX - MONTGOMERY COUNTY (339) - MSA 26420	38	11,478	14	2,999	7	115

2022 Institution Disclosure Statement - Table 3
Assessment Area/Non-Assessment Area Activity
Small Business Loans
Institution: COMERICA BANK

Respondent ID: 0000060143
Agency: FRS - 2

ASSESSMENT AREA LOANS	Originations		Originations to Businesses with <= \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
CA - RIVERSIDE COUNTY (065) - MSA 40140	13	3,642	1	170	43	2,067
CA - SAN BERNARDINO COUNTY (071) - MSA 40140	36	12,346	8	2,156	73	4,100
MI - JACKSON COUNTY (075) - MSA 27100	125	36,201	46	11,285	0	0
MI - KALAMAZOO COUNTY (077) - MSA 28020	51	13,659	15	2,362	0	0
MI - CLINTON COUNTY (037) - MSA 29620	9	1,696	6	571	0	0
MI - EATON COUNTY (045) - MSA 29620	12	4,330	3	598	0	0
MI - INGHAM COUNTY (065) - MSA 29620	49	8,385	20	1,747	0	0
MI - LENAWEE COUNTY (091) - MSA NA	15	3,656	6	1,571	0	0
MI - MIDLAND COUNTY (111) - MSA 33220	12	2,071	7	491	0	0
MI - MUSKEGON COUNTY (121) - MSA 34740	53	9,564	15	1,373	0	0
FL - COLLIER COUNTY (021) - MSA 34940	5	807	2	57	0	0
AZ - MARICOPA COUNTY (013) - MSA 38060	108	30,012	40	10,063	1	22
CA - MONTEREY COUNTY (053) - MSA 41500	15	4,653	6	1,413	2	116
TX - BEXAR COUNTY (029) - MSA 41700	64	19,582	18	5,907	7	122
TX - KENDALL COUNTY (259) - MSA 41700	3	1,150	2	900	0	0
CA - SAN DIEGO COUNTY (073) - MSA 41740	103	28,952	31	4,997	25	716
CA - ALAMEDA COUNTY (001) - MSA 36084	95	29,515	19	2,530	27	1,300
CA - CONTRA COSTA COUNTY (013) - MSA 36084	37	11,317	11	1,990	12	650
CA - SAN FRANCISCO COUNTY (075) - MSA 41884	42	14,877	6	2,510	3	56
CA - SAN MATEO COUNTY (081) - MSA 41884	43	8,594	10	1,380	3	173
CA - SANTA CLARA COUNTY (085) - MSA 41940	211	58,026	47	9,450	6	72
CA - SANTA CRUZ COUNTY (087) - MSA 42100	59	12,965	21	3,638	0	0
MI - LAPEER COUNTY (087) - MSA 47664	10	2,683	2	350	0	0

2022 Institution Disclosure Statement - Table 3
Assessment Area/Non-Assessment Area Activity
Small Business Loans
Institution: COMERICA BANK

Respondent ID: 0000060143
Agency: FRS - 2

ASSESSMENT AREA LOANS	Originations		Originations to Businesses with <= \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
MI - LIVINGSTON COUNTY (093) - MSA 47664	42	10,156	13	2,045	0	0
MI - MACOMB COUNTY (099) - MSA 47664	420	120,797	132	20,465	0	0
MI - OAKLAND COUNTY (125) - MSA 47664	846	214,245	301	53,292	0	0
MI - WAYNE COUNTY (163) - MSA 19804	588	155,979	216	35,373	2	22
CA - VENTURA COUNTY (111) - MSA 37100	19	4,270	3	165	4	190

2022 Institution Disclosure Statement - Table 4
Assessment Area/Non-Assessment Area Activity
Small Farm Loans
Institution: COMERICA BANK

Respondent ID: 0000060143
Agency: FRS - 2

ASSESSMENT AREA LOANS	Originations		Originations to Farms with ≤ \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
MI - WASHTENAW COUNTY (161) - MSA 11460	2	225	2	225	0	0
TX - KERR COUNTY (265) - MSA NA	1	45	1	45	0	0
MI - JACKSON COUNTY (075) - MSA 27100	3	610	3	610	0	0
MI - KALAMAZOO COUNTY (077) - MSA 28020	1	75	0	0	0	0
MI - LENAWEE COUNTY (091) - MSA NA	2	550	2	550	0	0
MI - MIDLAND COUNTY (111) - MSA 33220	1	50	1	50	0	0
MI - MUSKEGON COUNTY (121) - MSA 34740	1	100	0	0	0	0
AZ - MARICOPA COUNTY (013) - MSA 38060	1	90	0	0	0	0
CA - MONTEREY COUNTY (053) - MSA 41500	1	500	1	500	0	0
CA - SANTA CRUZ COUNTY (087) - MSA 42100	4	1,333	0	0	0	0

2022 Institution Disclosure Statement - Table 5
Community Development/Consortium-Third Party Activity
Institution: COMERICA BANK

PAGE: 1 OF 1

Respondent ID: 000060143
Agency: FRS - 2

Memo Item: Loans by Affiliates

	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
Community Development Loans				
Originated	455	2,023,438	0	0
Purchased	0	0	0	0
Total	455	2,023,438	0	0
Consortium/Third Party Loans (optional)				
Originated	4,191	2,106		
Purchased	0	0		
Total	4,191	2,106		

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

*** denotes no loans made in specified tracts**

Agency: FRS - 2

Institution: COMERICA BANK

ASSESSMENT AREA - 0007

BROWARD COUNTY (011), FL

MSA: 22744

Median Family Income 30-40%

0304.02* 0308.03* 0308.04* 1005.01*

Median Family Income 40-50%

0104.05* 0303.01 0415.00* 0428.02* 0503.09* 0503.14* 0602.14* 0602.15* 0604.05* 0705.04* 0919.04*

1002.03* 1005.02* 1103.34* 1103.54* 1103.55*

Median Family Income 50-60%

0103.05* 0204.12* 0205.02* 0412.00* 0414.00* 0416.01* 0416.02* 0417.00* 0427.00* 0503.11* 0503.12*

0601.27* 0601.30* 0602.03* 0603.02* 0603.03* 0604.02* 0701.04* 0804.05* 0911.00* 1002.01* 1003.01*

1004.00* 1007.00* 1008.01 1008.04*

Median Family Income 60-70%

0103.07* 0107.01* 0107.02* 0201.03* 0202.12* 0303.02* 0306.01 0306.02* 0310.01* 0409.01* 0409.02*

0410.00* 0411.00* 0413.00* 0433.02* 0502.07* 0502.08* 0503.13* 0507.02* 0508.00* 0601.17* 0603.04*

0603.06* 0611.00* 0805.00* 0901.03* 0903.01* 0904.03* 0904.04* 0912.01 0914.00* 0915.00* 0919.03*

1001.03* 1001.06* 1002.04* 1008.03* 1103.51* 1103.67

Median Family Income 70-80%

0102.02 0103.04* 0103.06 0104.02* 0104.03* 0202.13* 0203.02* 0203.08* 0203.11* 0203.13* 0203.23*

0203.24* 0204.04* 0204.05* 0204.07* 0204.17* 0204.20* 0204.21* 0302.01 0305.00 0307.03* 0307.05*

0308.05* 0308.06* 0403.00* 0428.01* 0429.00 0501.00* 0503.06* 0503.08* 0503.15* 0601.07* 0601.11*

0601.15* 0601.23* 0601.24* 0601.28 0601.29* 0602.07* 0602.08* 0602.11* 0603.05* 0703.24* 0703.27*

0706.01* 0905.04* 0916.01* 0917.01* 0917.02* 0918.03* 1006.00* 1103.12* 1103.23* 1103.46* 1106.00*

Median Family Income 80-90%

0101.04* 0104.07 0201.01* 0201.04* 0202.06* 0203.25* 0204.06* 0204.16* 0205.01* 0302.03* 0309.03*

0310.02* 0312.03* 0408.01* 0408.02* 0426.02* 0430.02* 0502.04 0503.01* 0504.02* 0507.01* 0602.06*

0604.01* 0605.01* 0606.03* 0608.02* 0702.12* 0702.13* 0703.23* 0802.00* 0912.02* 0916.02 0918.02*

0918.04* 1001.04* 1103.13* 1103.37* 1103.38* 1103.41* 1104.04*

Median Family Income 90-100%

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

*** denotes no loans made in specified tracts**

Agency: FRS - 2

Institution: COMERICA BANK

0106.13* 0108.00* 0202.11* 0203.12 0203.26* 0204.14* 0204.15* 0302.02* 0304.01* 0312.04* 0503.16*
0505.02* 0601.05* 0601.13* 0602.09* 0604.04* 0605.05* 0606.05* 0606.06* 0606.08* 0702.10* 0801.02*
0804.03* 0904.01* 0906.01* 0908.01* 0919.01* 1101.00* 1103.11* 1103.39* 1103.66* 1104.03* 1105.01*
1105.02*

Median Family Income 100-110%

0102.01* 0106.10* 0106.14* 0202.04* 0202.05* 0202.09* 0202.10* 0202.14* 0203.14* 0401.01* 0402.04*
0421.00* 0502.06* 0504.01 0505.01* 0506.02* 0601.09* 0606.09* 0701.02* 0701.03* 0702.04* 0703.28*
0705.03* 0801.04* 0801.05* 0804.06* 0910.00 0913.00* 1001.08* 1103.01* 1103.08* 1103.09* 1103.48*
1103.53* 1103.65* 1104.02*

Median Family Income 110-120%

0101.03* 0109.02* 0203.16 0203.20* 0204.19* 0309.04* 0601.16* 0601.25* 0608.01* 0610.04 0703.25*
0706.02* 0801.03* 0908.02* 1103.63*

Median Family Income >= 120%

0101.02* 0103.08* 0104.01* 0104.06* 0105.02* 0105.03* 0105.04* 0106.01* 0106.03* 0106.04* 0106.05*
0106.06* 0106.09* 0106.11* 0106.12* 0106.15* 0109.01* 0110.00* 0203.09* 0203.15* 0203.17* 0203.18*
0203.19* 0203.21* 0203.22* 0204.18* 0301.00* 0307.02* 0307.04* 0309.02* 0311.01* 0311.02* 0312.05*
0312.06* 0312.07* 0401.02* 0402.03* 0402.05* 0402.06* 0404.01* 0404.02* 0405.02* 0405.03* 0405.06*
0406.01* 0406.02* 0407.01 0407.02* 0418.01* 0418.02* 0419.00* 0420.00* 0422.00* 0423.01* 0423.02*
0424.00* 0425.01* 0425.02 0426.01* 0430.01* 0431.00* 0433.01* 0502.05* 0506.01 0509.00* 0510.01*
0510.02* 0601.14* 0601.18* 0601.19* 0601.20 0601.21* 0601.22* 0601.26* 0602.10* 0602.12* 0605.03*
0605.04* 0606.07* 0607.00* 0609.00* 0610.01* 0610.03* 0702.05* 0702.08 0702.09* 0702.11* 0703.04*
0703.06* 0703.10* 0703.11 0703.12* 0703.14* 0703.15* 0703.16* 0703.18* 0703.19* 0703.20* 0703.21*
0703.26* 0703.29* 0703.30* 0703.31* 0704.01* 0704.02* 0704.03* 0704.04* 0704.05* 0705.01* 0901.02*
0901.04* 0902.00* 0903.04* 0905.02 0905.03* 0906.02* 0907.00* 0909.00* 0920.00* 1001.05* 1001.07*
1103.03* 1103.07* 1103.19* 1103.21 1103.26* 1103.27 1103.28* 1103.30* 1103.32* 1103.33* 1103.44*
1103.45* 1103.47* 1103.50* 1103.52* 1103.56* 1103.57* 1103.58* 1103.59* 1103.60* 1103.61* 1103.64*
1103.68*

Median Family Income Not Known

0405.05* 0804.02* 0903.03* 1003.02 1103.49* 1103.62* 9800.00* 9900.00*

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

* denotes no loans made in specified tracts

Agency: FRS - 2

Institution: COMERICA BANK

PALM BEACH COUNTY (099), FL

MSA: 48424

Median Family Income 20-30%

0080.01*

Median Family Income 30-40%

0019.13* 0022.00 0082.02*

Median Family Income 40-50%

0002.22* 0013.02* 0014.02* 0014.03* 0019.09* 0024.00* 0029.00* 0042.07* 0044.02 0045.00* 0048.18*

0049.03* 0051.01* 0052.02* 0052.03* 0057.03* 0057.04* 0059.44* 0077.69* 0080.02* 0082.03*

Median Family Income 50-60%

0014.04* 0016.00* 0019.10* 0019.12* 0020.06* 0031.02* 0040.07* 0040.08* 0040.12* 0046.02* 0047.04*

0047.05* 0048.10* 0048.17* 0048.19* 0051.02* 0056.01* 0058.14* 0059.36* 0059.43* 0061.00* 0068.02*

0069.10* 0069.11* 0076.20* 0077.67* 0078.32* 0082.01* 0083.02*

Median Family Income 60-70%

0013.01* 0015.00* 0019.11* 0019.17* 0020.05* 0021.00* 0023.00* 0030.00* 0037.00* 0040.05* 0040.09*

0040.10* 0040.11* 0041.02* 0042.03 0042.04* 0047.02* 0047.06* 0048.21* 0052.04* 0058.10* 0058.15*

0059.33* 0059.39* 0060.06* 0062.03* 0065.01* 0068.01* 0072.08* 0077.32* 0077.41 0077.66* 0078.33

0081.01*

Median Family Income 70-80%

0002.13 0010.02* 0010.04* 0017.00* 0018.01* 0019.04* 0019.07* 0019.20* 0019.21* 0032.01* 0038.01*

0038.02* 0039.02* 0040.13* 0041.01* 0046.01* 0048.16* 0048.20* 0049.04* 0057.02* 0058.07* 0058.18*

0058.21* 0059.23* 0059.51* 0060.07* 0060.09 0060.12* 0062.01* 0067.00* 0069.08* 0076.19* 0077.39*

0077.42* 0078.43*

Median Family Income 80-90%

0002.04* 0003.04 0011.01* 0012.00* 0018.02* 0028.00* 0039.01* 0042.06* 0048.13* 0048.15* 0048.22*

0055.02* 0058.11* 0058.12* 0058.13* 0058.20* 0059.22* 0059.31* 0059.40* 0059.45* 0059.53* 0059.57*

0059.58* 0059.59 0060.10* 0060.11* 0072.04* 0072.07* 0073.02 0076.13* 0077.36* 0077.38* 0077.47*

0077.50*

Median Family Income 90-100%

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

*** denotes no loans made in specified tracts**

Agency: FRS - 2

Institution: COMERICA BANK

0002.16* 0019.18* 0032.02* 0042.05* 0044.01* 0056.02* 0059.26* 0059.30* 0059.38* 0060.05 0066.04*
0076.15* 0078.12* 0078.37* 0078.50*

Median Family Income 100-110%

0001.04* 0005.05* 0008.05* 0019.16* 0019.19* 0033.00* 0048.23* 0050.00* 0055.01* 0059.52* 0059.54*
0062.02* 0063.01* 0065.02* 0066.07 0069.09* 0075.04 0077.40* 0077.43* 0077.49* 0077.68* 0078.13*
0078.20* 0078.40* 0078.41* 0078.45* 0079.13* 0079.14* 0079.19*

Median Family Income 110-120%

0001.02* 0009.02* 0009.03* 0010.03 0031.01 0053.00* 0058.19* 0059.16* 0059.17* 0059.21* 0059.47*
0059.55* 0059.60* 0069.06* 0072.02 0076.12* 0077.05 0077.16* 0077.24* 0077.25* 0077.51* 0077.58*
0077.63* 0077.64* 0077.79* 0078.21* 0078.38* 0078.42* 0078.46* 0078.51* 0079.16* 0079.18*

Median Family Income >= 120%

0001.03* 0002.02 0002.08* 0002.10* 0002.11* 0002.14* 0002.17* 0002.19* 0002.20* 0002.21* 0002.23*
0003.01* 0003.03* 0004.05* 0004.06* 0004.07* 0004.08* 0004.10 0005.07* 0005.09* 0005.12* 0005.13*
0006.00* 0007.02* 0007.03 0008.03* 0009.04* 0009.05* 0011.02* 0026.00* 0027.01* 0027.02* 0027.03*
0034.00* 0035.07* 0035.12* 0035.13 0036.00 0043.00* 0049.02* 0054.11* 0054.12* 0054.13* 0059.18*
0059.34* 0059.37* 0059.42* 0059.46* 0059.49* 0059.50* 0059.61* 0060.08* 0063.02* 0064.01* 0064.02*
0066.02* 0066.06 0069.07* 0069.12 0070.05 0070.06* 0070.07* 0070.08* 0070.09 0070.10* 0070.11*
0070.13* 0072.05* 0072.06* 0073.01 0074.07* 0074.10* 0074.12* 0074.14* 0074.20* 0074.21* 0075.01*
0075.05* 0076.03* 0076.04* 0076.05* 0076.10* 0076.14* 0076.16* 0076.21* 0076.22 0076.23* 0076.24*
0077.10* 0077.21* 0077.23* 0077.30* 0077.31* 0077.35* 0077.48* 0077.52* 0077.54* 0077.57* 0077.59*
0077.70* 0077.71* 0077.72* 0077.73 0077.74* 0077.75* 0077.76* 0077.77* 0077.78 0077.80* 0078.05*
0078.14* 0078.18* 0078.23* 0078.30* 0078.31* 0078.34* 0078.35* 0078.44* 0078.47* 0078.48* 0078.49*
0078.53* 0079.09* 0079.15* 0079.17*

Median Family Income Not Known

0002.18* 0035.14 0070.12 0071.00* 0077.46* 0078.52* 0081.02* 0083.01* 9800.00* 9801.00* 9802.00*
9804.00* 9805.00 9900.00* 9901.00*

ASSESSMENT AREA - 0018

COLLIER COUNTY (021), FL

MSA: 34940

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

*** denotes no loans made in specified tracts**

Agency: FRS - 2

Institution: COMERICA BANK

Low Income

0007.00* 0104.22* 0112.04* 0112.05* 0113.03* 0113.05* 0113.06* 0114.00*

Moderate Income

0102.11* 0104.11* 0104.19* 0104.20* 0104.21* 0104.28* 0105.08* 0105.11 0105.12* 0105.16* 0105.17*

0106.01* 0106.05* 0107.01* 0108.04* 0111.03* 0111.10* 0111.11* 0112.06* 0112.14* 0113.04*

Middle Income

0101.07* 0101.08* 0101.09* 0101.10* 0101.12* 0101.14* 0102.16* 0102.17* 0103.00* 0104.01* 0104.08*

0104.24* 0104.25* 0104.26* 0104.27* 0104.29* 0104.30* 0104.34* 0104.36* 0104.38* 0105.13 0105.14*

0105.15* 0105.19* 0105.20* 0106.02* 0106.04* 0106.06* 0107.02* 0108.01* 0108.05* 0108.07* 0109.04*

0109.06* 0109.07* 0110.03* 0111.07* 0111.08* 0111.09* 0111.13* 0111.14* 0112.08* 0112.10* 0112.11*

Upper Income

0001.01* 0001.02* 0002.00* 0003.01* 0003.02* 0004.01* 0004.02* 0005.00* 0006.00* 0101.02* 0101.11*

0101.13* 0102.05* 0102.08* 0102.09* 0102.10* 0102.13* 0102.15* 0104.16* 0104.23* 0104.31* 0104.32

0104.33* 0104.35* 0105.18* 0108.08* 0109.02* 0109.05* 0111.12* 0112.07* 0112.09* 0112.12* 0112.13*

Income Not Known

0104.37* 0108.06* 9900.00*

OUTSIDE ASSESSMENT AREA

ESCAMBIA COUNTY (033), FL

MSA: 37860

Upper Income

0001.00 0026.06

HIGHLANDS COUNTY (055), FL

MSA: 42700

Income Not Known

9802.00

HILLSBOROUGH COUNTY (057), FL

MSA: 45300

Median Family Income 60-70%

0133.17

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

*** denotes no loans made in specified tracts**

Agency: FRS - 2

Institution: COMERICA BANK

Median Family Income 70-80%

0114.14

Median Family Income 100-110%

0017.00

Median Family Income >= 120%

0051.01

INDIAN RIVER COUNTY (061), FL

MSA: 42680

Upper Income

0505.05

LEE COUNTY (071), FL

MSA: 15980

Median Family Income 40-50%

0006.00 0011.01

Median Family Income 60-70%

0013.00

Median Family Income 70-80%

0401.21

Median Family Income >= 120%

0401.13 0401.38

Median Family Income Not Known

0801.00

MARTIN COUNTY (085), FL

MSA: 38940

Low Income

0012.00

Upper Income

0007.01

MIAMI-DADE COUNTY (086), FL

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

*** denotes no loans made in specified tracts**

Agency: FRS - 2

Institution: COMERICA BANK

MSA: 33124

Median Family Income 80-90%

0013.02

Median Family Income 100-110%

0090.66

Median Family Income >= 120%

0037.10 0046.02 0067.13 0067.18 0067.20 0074.01 0090.10

ORANGE COUNTY (095), FL

MSA: 36740

Median Family Income 60-70%

0170.22

PINELLAS COUNTY (103), FL

MSA: 45300

Median Family Income 40-50%

0246.04

Median Family Income 90-100%

0245.07

Median Family Income 100-110%

0273.27

POLK COUNTY (105), FL

MSA: 29460

Median Family Income 60-70%

0109.00

Median Family Income >= 120%

0115.02

ST. JOHNS COUNTY (109), FL

MSA: 27260

Upper Income

0208.04

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

* denotes no loans made in specified tracts

Institution: COMERICA BANK

Respondent ID: 0000060143

Agency: FRS - 2

SARASOTA COUNTY (115), FL

MSA: 35840

Upper Income

0026.01 0027.25 0027.26

SEMINOLE COUNTY (117), FL

MSA: 36740

Upper Income

0208.05

2022 Institution Disclosure Statement - Table E-1

Error Status Information

Respondent ID: 0000060143

Institution: COMERICA BANK

Agency: FRS - 2

Record Identifier: ¹¹	Total Composite Records on File	Total Composite Records Without Errors	Total Validity¹⁰ Errors	Percentage of Validity Errors
Transmittal Sheet	1	1	0	0.00%
Small Business Loans	3,511	3,511	0	0.00%
Small Farm Loans	23	23	0	0.00%
Community Development Loans	1	1	0	0.00%
Consortium/Third Party Loans (Optional)	1	1	0	0.00%
Assessment Area	14,647	14,647	0	0.00%
Total	18,184	18,184	0	0.00%

Footnote:

10. A validity edit helps to verify the accuracy of the data reported. An institution's CRA submission that passes all validity edits does not ensure 100% accurate data. True accuracy is determined during the examination process.

11. A record represents one row of data reported to the Federal Reserve Board. This does not in any way represent the number of loans originated or purchased by the institution.

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
ALACHUA COUNTY (001), FL										
MSA 23540										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	1	500	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	500	0	0	0	0
BROWARD COUNTY (011), FL										
MSA 22744										
Inside AA 0007										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	1	25	0	0	1	1,000	0	0	0	0
Median Family Income 70-80%	2	150	0	0	3	2,000	2	150	0	0
Median Family Income 80-90%	1	50	0	0	2	1,300	1	300	0	0
Median Family Income 90-100%	0	0	1	250	0	0	0	0	0	0
Median Family Income 100-110%	1	25	0	0	0	0	1	25	0	0
Median Family Income 110-120%	1	75	0	0	0	0	1	75	0	0
Median Family Income >= 120%	5	230	0	0	3	1,047	4	595	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	11	555	1	250	9	5,347	9	1,145	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
CLAY COUNTY (019), FL										
MSA 27260										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	1	1,000	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	1,000	0	0	0	0
COLLIER COUNTY (021), FL										
MSA 34940										
Inside AA 0018										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	1	10	0	0	1	260	2	270	0	0
Middle Income	1	100	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	110	0	0	1	260	2	270	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
DUVAL COUNTY (031), FL										
MSA 27260										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	2	1,500	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	2	1,500	0	0	0	0
ESCAMBIA COUNTY (033), FL										
MSA 37860										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	2	55	0	0	1	750	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	55	0	0	1	750	0	0	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
HIGHLANDS COUNTY (055), FL										
MSA 42700										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	1	7	0	0	0	0	1	7	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	7	0	0	0	0	1	7	0	0
HILLSBOROUGH COUNTY (057), FL										
MSA 45300										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	1	80	0	0	0	0	1	80	0	0
Median Family Income 70-80%	1	25	0	0	0	0	1	25	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	1	25	0	0	0	0	1	25	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	1	50	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	4	180	0	0	0	0	3	130	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
INDIAN RIVER COUNTY (061), FL										
MSA 42680										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	1	300	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	300	0	0	0	0
LAKE COUNTY (069), FL										
MSA 36740										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	1	825	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	825	0	0	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
LEE COUNTY (071), FL										
MSA 15980										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	1	300	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	1	60	0	0	1	500	1	500	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	2	400	0	0	1	250	0	0
Median Family Income Not Known	0	0	1	250	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	60	3	650	2	800	2	750	0	0
MARTIN COUNTY (085), FL										
MSA 38940										
Outside Assessment Area										
Low Income	1	50	0	0	0	0	1	50	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	50	1	250	1	500	1	50	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	100	1	250	1	500	2	100	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
MIAMI-DADE COUNTY (086), FL										
MSA 33124										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	1	587	1	587	0	0
Median Family Income 60-70%	0	0	1	200	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	2	1,100	0	0	0	0
Median Family Income 100-110%	0	0	0	0	1	450	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	7	235	1	150	0	0	2	13	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	7	235	2	350	4	2,137	3	600	0	0
MONROE COUNTY (087), FL										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	40	0	0	0	0	1	40	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	40	0	0	0	0	1	40	0	0

Loans by County

Respondent ID: 000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
ORANGE COUNTY (095), FL										
MSA 36740										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	1	924	0	0	0	0
Median Family Income 60-70%	1	60	1	250	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	60	1	250	1	924	0	0	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
PALM BEACH COUNTY (099), FL										
MSA 48424										
Inside AA 0007										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	2	905	1	300	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	1	25	1	200	0	0	1	25	0	0
Median Family Income 70-80%	1	50	1	200	0	0	1	50	0	0
Median Family Income 80-90%	0	0	2	313	4	3,150	2	1,193	0	0
Median Family Income 90-100%	1	10	0	0	0	0	1	10	0	0
Median Family Income 100-110%	1	80	0	0	1	500	0	0	0	0
Median Family Income 110-120%	5	282	1	250	0	0	5	282	0	0
Median Family Income >= 120%	4	235	6	1,250	5	3,050	10	3,775	0	0
Median Family Income Not Known	7	380	0	0	2	1,098	3	55	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	20	1,062	11	2,213	14	8,703	24	5,690	0	0

Loans by County

Respondent ID: 000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
PINELLAS COUNTY (103), FL										
MSA 45300										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	1	900	0	0	0	0
Median Family Income 100-110%	1	25	1	250	0	0	1	25	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	1	50	0	0	1	500	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	75	1	250	2	1,400	1	25	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
POLK COUNTY (105), FL										
MSA 29460										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	0	0	2	1,050	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	2	1,050	0	0	0	0
ST. JOHNS COUNTY (109), FL										
MSA 27260										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	20	0	0	0	0	1	20	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	20	0	0	0	0	1	20	0	0

Loans by County

Respondent ID: 000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
SARASOTA COUNTY (115), FL										
MSA 35840										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	100	0	0	1	300	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	100	0	0	1	300	0	0	0	0
SEMINOLE COUNTY (117), FL										
MSA 36740										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	1	184	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	5	0	0	0	0	1	5	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	5	1	184	0	0	1	5	0	0
WALTON COUNTY (131), FL										
MSA 18880										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	50	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	50	0	0	0	0	0	0	0	0
TOTAL INSIDE AA IN STATE	33	1,727	12	2,463	24	14,310	35	7,105	0	0

Loans by County

Respondent ID: 0000060143

Small Business Loans - Originations

Agency: FRS - 2

Institution: COMERICA BANK

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
TOTAL OUTSIDE AA IN STATE	25	987	9	1,934	20	11,986	15	1,677	0	0
STATE TOTAL	58	2,714	21	4,397	44	26,296	50	8,782	0	0

Loans by County

Small Business Loans - Purchases

Institution: COMERICA BANK

Respondent ID: 000060143

Agency: FRS - 2

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
BROWARD COUNTY (011), FL										
MSA 22744										
Inside AA 0007										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	3	30	0	0	0	0	2	20	0	0
Median Family Income 70-80%	0	0	1	102	0	0	1	102	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	7	70	0	0	0	0	6	60	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	10	100	1	102	0	0	9	182	0	0
COLLIER COUNTY (021), FL										
MSA 34940										
Inside AA 0018										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	1	22	0	0	0	0	1	22	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	22	0	0	0	0	1	22	0	0

Loans by County

Small Business Loans - Purchases

Institution: COMERICA BANK

Respondent ID: 000060143

Agency: FRS - 2

State: FLORIDA (12)

Area Income Characteristics	Loan Amount at Origination <=\$100,000		Loan Amount at Origination >\$100,000 But <=\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues <= \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
PALM BEACH COUNTY (099), FL										
MSA 48424										
Inside AA 0007										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	1	5	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	1	10	0	0	0	0	1	10	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income >= 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	15	0	0	0	0	1	10	0	0
TOTAL INSIDE AA IN STATE	13	137	1	102	0	0	11	214	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
STATE TOTAL	13	137	1	102	0	0	11	214	0	0

2023 Institution Disclosure Statement - Table 3
Assessment Area/Non-Assessment Area Activity
Small Business Loans
Institution: COMERICA BANK

Respondent ID: 0000060143
Agency: FRS - 2

ASSESSMENT AREA LOANS	Originations		Originations to Businesses with <= \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
MI - WASHTENAW COUNTY (161) - MSA 11460	134	30,852	42	7,034	0	0
TX - TRAVIS COUNTY (453) - MSA 12420	116	24,311	43	5,440	4	98
TX - WILLIAMSON COUNTY (491) - MSA 12420	33	8,347	16	2,962	1	47
TX - KERR COUNTY (265) - MSA NA	4	600	1	100	0	0
MI - CALHOUN COUNTY (025) - MSA 12980	54	14,701	19	2,618	0	0
TX - COLLIN COUNTY (085) - MSA 19124	123	35,984	38	6,618	1	5
TX - DALLAS COUNTY (113) - MSA 19124	467	115,172	139	20,878	4	40
TX - DENTON COUNTY (121) - MSA 19124	44	11,185	11	1,077	11	190
TX - ELLIS COUNTY (139) - MSA 19124	8	1,539	4	1,095	1	57
TX - ROCKWALL COUNTY (397) - MSA 19124	5	1,212	1	195	0	0
TX - TARRANT COUNTY (439) - MSA 23104	125	35,009	34	7,554	9	171
MI - GENESEE COUNTY (049) - MSA 22420	25	6,652	4	510	0	0
FL - BROWARD COUNTY (011) - MSA 22744	21	6,152	9	1,145	11	202
FL - PALM BEACH COUNTY (099) - MSA 48424	45	11,978	24	5,690	2	15
MI - KENT COUNTY (081) - MSA 24340	107	30,725	23	2,719	0	0
MI - OTTAWA COUNTY (139) - MSA 24340	35	12,200	5	570	0	0
CA - LOS ANGELES COUNTY (037) - MSA 31084	367	86,658	140	22,946	33	1,411
CA - ORANGE COUNTY (059) - MSA 11244	161	40,335	43	7,128	4	211
TX - BRAZORIA COUNTY (039) - MSA 26420	14	3,119	6	747	5	98
TX - FORT BEND COUNTY (157) - MSA 26420	75	14,179	28	4,481	13	341
TX - GALVESTON COUNTY (167) - MSA 26420	9	2,185	4	205	0	0
TX - HARRIS COUNTY (201) - MSA 26420	570	128,017	221	33,748	66	1,554
TX - MONTGOMERY COUNTY (339) - MSA 26420	36	9,340	16	2,690	4	76

2023 Institution Disclosure Statement - Table 3
Assessment Area/Non-Assessment Area Activity
Small Business Loans
Institution: COMERICA BANK

Respondent ID: 0000060143
Agency: FRS - 2

ASSESSMENT AREA LOANS	Originations		Originations to Businesses with <= \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
CA - RIVERSIDE COUNTY (065) - MSA 40140	22	5,062	5	822	15	1,275
CA - SAN BERNARDINO COUNTY (071) - MSA 40140	31	9,381	5	385	20	1,664
MI - JACKSON COUNTY (075) - MSA 27100	137	33,313	49	8,776	0	0
MI - KALAMAZOO COUNTY (077) - MSA 28020	65	16,247	19	2,799	1	8
MI - CLINTON COUNTY (037) - MSA 29620	7	768	4	475	0	0
MI - EATON COUNTY (045) - MSA 29620	8	1,828	1	250	0	0
MI - INGHAM COUNTY (065) - MSA 29620	52	12,700	15	2,571	0	0
MI - LENAWEE COUNTY (091) - MSA NA	8	1,484	2	280	0	0
MI - MIDLAND COUNTY (111) - MSA 33220	9	1,771	4	366	0	0
MI - MUSKEGON COUNTY (121) - MSA 34740	50	11,337	16	1,696	0	0
FL - COLLIER COUNTY (021) - MSA 34940	3	370	2	270	1	22
AZ - MARICOPA COUNTY (013) - MSA 38060	117	22,922	50	5,836	4	37
CA - MONTEREY COUNTY (053) - MSA 41500	12	1,210	4	370	0	0
TX - BEXAR COUNTY (029) - MSA 41700	73	20,619	21	2,874	48	1,226
TX - KENDALL COUNTY (259) - MSA 41700	2	350	1	100	1	23
CA - SAN DIEGO COUNTY (073) - MSA 41740	118	35,806	39	7,527	35	1,499
CA - ALAMEDA COUNTY (001) - MSA 36084	85	24,179	12	1,695	14	572
CA - CONTRA COSTA COUNTY (013) - MSA 36084	29	8,123	7	1,350	9	728
CA - SAN FRANCISCO COUNTY (075) - MSA 41884	48	11,536	11	2,913	3	81
CA - SAN MATEO COUNTY (081) - MSA 41884	51	9,746	14	1,708	1	25
CA - SANTA CLARA COUNTY (085) - MSA 41940	202	52,596	43	6,092	20	1,258
CA - SANTA CRUZ COUNTY (087) - MSA 42100	63	9,592	21	2,422	0	0
MI - LAPEER COUNTY (087) - MSA 47664	8	3,124	2	1,864	0	0

2023 Institution Disclosure Statement - Table 3
Assessment Area/Non-Assessment Area Activity
Small Business Loans
Institution: COMERICA BANK

Respondent ID: 0000060143
Agency: FRS - 2

ASSESSMENT AREA LOANS	Originations		Originations to Businesses with <= \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
MI - LIVINGSTON COUNTY (093) - MSA 47664	40	7,603	13	1,852	0	0
MI - MACOMB COUNTY (099) - MSA 47664	393	104,484	135	20,757	1	10
MI - OAKLAND COUNTY (125) - MSA 47664	804	194,900	302	47,822	1	10
MI - WAYNE COUNTY (163) - MSA 19804	652	150,955	242	36,094	2	42
CA - VENTURA COUNTY (111) - MSA 37100	15	3,177	7	645	2	152

2023 Institution Disclosure Statement - Table 4
Assessment Area/Non-Assessment Area Activity
Small Farm Loans
Institution: COMERICA BANK

Respondent ID: 0000060143
Agency: FRS - 2

ASSESSMENT AREA LOANS	Originations		Originations to Farms with ≤ \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
MI - WASHTENAW COUNTY (161) - MSA 11460	1	60	0	0	0	0
TX - KERR COUNTY (265) - MSA NA	1	45	1	45	0	0
MI - OTTAWA COUNTY (139) - MSA 24340	1	95	1	95	0	0
MI - JACKSON COUNTY (075) - MSA 27100	1	450	1	450	0	0
MI - LENAWEE COUNTY (091) - MSA NA	2	550	2	550	0	0
MI - MIDLAND COUNTY (111) - MSA 33220	1	50	1	50	0	0
MI - MUSKEGON COUNTY (121) - MSA 34740	1	100	0	0	0	0
CA - MONTEREY COUNTY (053) - MSA 41500	1	500	1	500	0	0
CA - SANTA CRUZ COUNTY (087) - MSA 42100	5	1,725	1	250	0	0
MI - OAKLAND COUNTY (125) - MSA 47664	1	65	0	0	0	0

2023 Institution Disclosure Statement - Table 5
Community Development/Consortium-Third Party Activity
Institution: COMERICA BANK

Respondent ID: 000060143
Agency: FRS - 2

Memo Item: Loans by Affiliates

	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
Community Development Loans				
Originated	469	2,079,336	0	0
Purchased	0	0	0	0
Total	469	2,079,336	0	0
Consortium/Third Party Loans (optional)				

2023 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

*** denotes no loans made in specified tracts**

Agency: FRS - 2

Institution: COMERICA BANK

ASSESSMENT AREA - 0007

BROWARD COUNTY (011), FL

MSA: 22744

Median Family Income 30-40%

0304.02* 0308.03* 0308.04* 1005.01*

Median Family Income 40-50%

0104.05* 0303.01* 0415.00* 0428.02* 0503.09* 0503.14* 0602.14* 0602.15* 0604.05* 0705.04* 0919.04*

1002.03* 1005.02* 1103.34* 1103.54* 1103.55*

Median Family Income 50-60%

0103.05* 0204.12* 0205.02* 0412.00* 0414.00* 0416.01* 0416.02* 0417.00* 0427.00* 0503.11* 0503.12*

0601.27* 0601.30* 0602.03* 0603.02* 0603.03* 0604.02* 0701.04* 0804.05* 0911.00* 1002.01* 1003.01*

1004.00* 1007.00* 1008.01* 1008.04*

Median Family Income 60-70%

0103.07* 0107.01* 0107.02* 0201.03* 0202.12* 0303.02* 0306.01 0306.02* 0310.01* 0409.01* 0409.02*

0410.00* 0411.00* 0413.00* 0433.02* 0502.07 0502.08* 0503.13* 0507.02* 0508.00* 0601.17 0603.04

0603.06* 0611.00* 0805.00* 0901.03* 0903.01* 0904.03* 0904.04* 0912.01* 0914.00* 0915.00* 0919.03

1001.03* 1001.06* 1002.04* 1008.03* 1103.51* 1103.67*

Median Family Income 70-80%

0102.02 0103.04* 0103.06 0104.02* 0104.03* 0202.13* 0203.02* 0203.08* 0203.11* 0203.13* 0203.23*

0203.24* 0204.04* 0204.05* 0204.07* 0204.17* 0204.20* 0204.21* 0302.01 0305.00 0307.03* 0307.05*

0308.05* 0308.06* 0403.00* 0428.01* 0429.00* 0501.00* 0503.06* 0503.08* 0503.15* 0601.07* 0601.11*

0601.15* 0601.23* 0601.24* 0601.28* 0601.29* 0602.07* 0602.08* 0602.11* 0603.05* 0703.24* 0703.27

0706.01* 0905.04* 0916.01* 0917.01* 0917.02* 0918.03* 1006.00* 1103.12* 1103.23* 1103.46* 1106.00*

Median Family Income 80-90%

0101.04* 0104.07 0201.01* 0201.04* 0202.06* 0203.25* 0204.06* 0204.16* 0205.01* 0302.03* 0309.03*

0310.02* 0312.03* 0408.01* 0408.02* 0426.02* 0430.02* 0502.04 0503.01* 0504.02* 0507.01* 0602.06*

0604.01* 0605.01* 0606.03* 0608.02* 0702.12* 0702.13* 0703.23* 0802.00* 0912.02* 0916.02* 0918.02*

0918.04* 1001.04* 1103.13* 1103.37* 1103.38* 1103.41* 1104.04*

Median Family Income 90-100%

2023 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

*** denotes no loans made in specified tracts**

Agency: FRS - 2

Institution: COMERICA BANK

0106.13* 0108.00* 0202.11* 0203.12* 0203.26* 0204.14* 0204.15* 0302.02* 0304.01* 0312.04* 0503.16*
0505.02* 0601.05* 0601.13* 0602.09* 0604.04* 0605.05* 0606.05* 0606.06* 0606.08* 0702.10* 0801.02
0804.03* 0904.01* 0906.01* 0908.01* 0919.01* 1101.00* 1103.11* 1103.39* 1103.66* 1104.03* 1105.01*
1105.02*

Median Family Income 100-110%

0102.01* 0106.10* 0106.14* 0202.04* 0202.05* 0202.09* 0202.10* 0202.14* 0203.14* 0401.01* 0402.04*
0421.00* 0502.06* 0504.01* 0505.01* 0506.02* 0601.09* 0606.09* 0701.02* 0701.03* 0702.04* 0703.28*
0705.03* 0801.04* 0801.05* 0804.06* 0910.00 0913.00* 1001.08* 1103.01* 1103.08* 1103.09* 1103.48*
1103.53* 1103.65* 1104.02*

Median Family Income 110-120%

0101.03* 0109.02* 0203.16* 0203.20* 0204.19* 0309.04* 0601.16* 0601.25* 0608.01* 0610.04 0703.25*
0706.02* 0801.03* 0908.02* 1103.63*

Median Family Income >= 120%

0101.02* 0103.08 0104.01* 0104.06* 0105.02* 0105.03* 0105.04* 0106.01* 0106.03* 0106.04* 0106.05*
0106.06* 0106.09 0106.11* 0106.12* 0106.15* 0109.01* 0110.00* 0203.09 0203.15* 0203.17* 0203.18*
0203.19* 0203.21* 0203.22* 0204.18* 0301.00* 0307.02* 0307.04* 0309.02* 0311.01* 0311.02* 0312.05*
0312.06* 0312.07* 0401.02* 0402.03* 0402.05* 0402.06* 0404.01 0404.02 0405.02* 0405.03* 0405.06*
0406.01* 0406.02* 0407.01* 0407.02 0418.01* 0418.02* 0419.00* 0420.00* 0422.00* 0423.01* 0423.02
0424.00* 0425.01* 0425.02* 0426.01* 0430.01* 0431.00* 0433.01* 0502.05* 0506.01 0509.00* 0510.01*
0510.02* 0601.14* 0601.18* 0601.19* 0601.20* 0601.21* 0601.22* 0601.26* 0602.10* 0602.12* 0605.03
0605.04* 0606.07* 0607.00* 0609.00* 0610.01* 0610.03* 0702.05* 0702.08* 0702.09* 0702.11* 0703.04*
0703.06* 0703.10* 0703.11* 0703.12* 0703.14* 0703.15* 0703.16* 0703.18* 0703.19* 0703.20* 0703.21*
0703.26* 0703.29* 0703.30* 0703.31* 0704.01* 0704.02* 0704.03* 0704.04* 0704.05* 0705.01 0901.02*
0901.04* 0902.00* 0903.04* 0905.02* 0905.03* 0906.02* 0907.00* 0909.00* 0920.00* 1001.05* 1001.07*
1103.03* 1103.07* 1103.19 1103.21 1103.26* 1103.27 1103.28* 1103.30* 1103.32* 1103.33* 1103.44*
1103.45* 1103.47* 1103.50* 1103.52* 1103.56* 1103.57* 1103.58* 1103.59* 1103.60 1103.61* 1103.64*
1103.68*

Median Family Income Not Known

0405.05* 0804.02* 0903.03* 1003.02* 1103.49* 1103.62* 9800.00* 9900.00*

2023 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

* denotes no loans made in specified tracts

Agency: FRS - 2

Institution: COMERICA BANK

PALM BEACH COUNTY (099), FL

MSA: 48424

Median Family Income 20-30%

0080.01*

Median Family Income 30-40%

0019.13* 0022.00* 0082.02*

Median Family Income 40-50%

0002.22* 0013.02* 0014.02* 0014.03* 0019.09* 0024.00* 0029.00* 0042.07* 0044.02 0045.00 0048.18*

0049.03* 0051.01* 0052.02* 0052.03* 0057.03* 0057.04* 0059.44* 0077.69* 0080.02* 0082.03*

Median Family Income 50-60%

0014.04* 0016.00* 0019.10* 0019.12* 0020.06* 0031.02* 0040.07* 0040.08* 0040.12* 0046.02* 0047.04*

0047.05* 0048.10* 0048.17* 0048.19* 0051.02* 0056.01* 0058.14* 0059.36 0059.43* 0061.00* 0068.02*

0069.10* 0069.11* 0076.20* 0077.67* 0078.32* 0082.01* 0083.02*

Median Family Income 60-70%

0013.01* 0015.00* 0019.11* 0019.17* 0020.05* 0021.00* 0023.00* 0030.00* 0037.00* 0040.05* 0040.09*

0040.10* 0040.11* 0041.02* 0042.03 0042.04* 0047.02* 0047.06* 0048.21* 0052.04* 0058.10* 0058.15*

0059.33* 0059.39* 0060.06* 0062.03* 0065.01* 0068.01* 0072.08* 0077.32* 0077.41 0077.66* 0078.33*

0081.01*

Median Family Income 70-80%

0002.13 0010.02* 0010.04* 0017.00* 0018.01* 0019.04* 0019.07* 0019.20* 0019.21* 0032.01* 0038.01*

0038.02* 0039.02* 0040.13* 0041.01* 0046.01* 0048.16* 0048.20* 0049.04* 0057.02* 0058.07* 0058.18*

0058.21* 0059.23* 0059.51* 0060.07* 0060.09 0060.12* 0062.01* 0067.00* 0069.08* 0076.19* 0077.39*

0077.42* 0078.43*

Median Family Income 80-90%

0002.04* 0003.04 0011.01* 0012.00* 0018.02 0028.00 0039.01* 0042.06* 0048.13* 0048.15* 0048.22*

0055.02 0058.11* 0058.12* 0058.13* 0058.20* 0059.22* 0059.31* 0059.40* 0059.45* 0059.53* 0059.57*

0059.58* 0059.59 0060.10* 0060.11* 0072.04* 0072.07* 0073.02* 0076.13* 0077.36* 0077.38* 0077.47

0077.50*

Median Family Income 90-100%

2023 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

*** denotes no loans made in specified tracts**

Agency: FRS - 2

Institution: COMERICA BANK

0002.16* 0019.18* 0032.02* 0042.05* 0044.01* 0056.02* 0059.26* 0059.30* 0059.38* 0060.05 0066.04*
0076.15* 0078.12* 0078.37* 0078.50*

Median Family Income 100-110%

0001.04* 0005.05* 0008.05* 0019.16* 0019.19* 0033.00 0048.23* 0050.00* 0055.01* 0059.52* 0059.54*
0062.02* 0063.01* 0065.02* 0066.07* 0069.09* 0075.04 0077.40* 0077.43* 0077.49* 0077.68* 0078.13*
0078.20* 0078.40* 0078.41* 0078.45* 0079.13* 0079.14* 0079.19*

Median Family Income 110-120%

0001.02* 0009.02* 0009.03* 0010.03 0031.01* 0053.00 0058.19* 0059.16* 0059.17* 0059.21* 0059.47*
0059.55* 0059.60* 0069.06* 0072.02 0076.12* 0077.05 0077.16* 0077.24* 0077.25* 0077.51* 0077.58*
0077.63 0077.64* 0077.79* 0078.21* 0078.38* 0078.42* 0078.46* 0078.51* 0079.16* 0079.18*

Median Family Income >= 120%

0001.03* 0002.02 0002.08* 0002.10* 0002.11* 0002.14* 0002.17* 0002.19* 0002.20* 0002.21* 0002.23*
0003.01* 0003.03* 0004.05* 0004.06* 0004.07* 0004.08* 0004.10 0005.07* 0005.09* 0005.12* 0005.13*
0006.00* 0007.02 0007.03* 0008.03* 0009.04* 0009.05* 0011.02* 0026.00* 0027.01* 0027.02* 0027.03*
0034.00* 0035.07* 0035.12* 0035.13 0036.00 0043.00* 0049.02* 0054.11* 0054.12* 0054.13* 0059.18*
0059.34* 0059.37* 0059.42* 0059.46* 0059.49* 0059.50* 0059.61* 0060.08* 0063.02* 0064.01* 0064.02*
0066.02* 0066.06* 0069.07* 0069.12 0070.05 0070.06* 0070.07* 0070.08* 0070.09 0070.10* 0070.11*
0070.13* 0072.05* 0072.06* 0073.01 0074.07* 0074.10* 0074.12* 0074.14* 0074.20 0074.21* 0075.01*
0075.05 0076.03* 0076.04* 0076.05* 0076.10* 0076.14* 0076.16* 0076.21* 0076.22 0076.23* 0076.24*
0077.10* 0077.21* 0077.23* 0077.30* 0077.31* 0077.35* 0077.48* 0077.52* 0077.54* 0077.57* 0077.59
0077.70* 0077.71* 0077.72* 0077.73 0077.74* 0077.75* 0077.76* 0077.77* 0077.78* 0077.80* 0078.05*
0078.14* 0078.18* 0078.23* 0078.30* 0078.31* 0078.34* 0078.35* 0078.44* 0078.47* 0078.48* 0078.49*
0078.53* 0079.09* 0079.15* 0079.17*

Median Family Income Not Known

0002.18* 0035.14 0070.12 0071.00* 0077.46* 0078.52* 0081.02* 0083.01* 9800.00* 9801.00* 9802.00*
9804.00* 9805.00 9900.00* 9901.00*

ASSESSMENT AREA - 0018

COLLIER COUNTY (021), FL

MSA: 34940

2023 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

*** denotes no loans made in specified tracts**

Agency: FRS - 2

Institution: COMERICA BANK

Low Income

0007.00* 0104.22* 0112.04* 0112.05* 0113.03* 0113.05* 0113.06* 0114.00*

Moderate Income

0102.11* 0104.11* 0104.19 0104.20* 0104.21* 0104.28 0105.08* 0105.11 0105.12* 0105.16* 0105.17*
0106.01* 0106.05* 0107.01* 0108.04* 0111.03* 0111.10* 0111.11* 0112.06* 0112.14* 0113.04*

Middle Income

0101.07* 0101.08* 0101.09* 0101.10* 0101.12* 0101.14* 0102.16* 0102.17* 0103.00* 0104.01* 0104.08*
0104.24* 0104.25* 0104.26* 0104.27* 0104.29* 0104.30* 0104.34* 0104.36* 0104.38* 0105.13 0105.14*
0105.15* 0105.19* 0105.20* 0106.02* 0106.04* 0106.06* 0107.02* 0108.01* 0108.05* 0108.07* 0109.04*
0109.06* 0109.07* 0110.03* 0111.07* 0111.08* 0111.09* 0111.13* 0111.14* 0112.08* 0112.10* 0112.11*

Upper Income

0001.01* 0001.02* 0002.00* 0003.01* 0003.02* 0004.01* 0004.02* 0005.00* 0006.00* 0101.02* 0101.11*
0101.13* 0102.05* 0102.08* 0102.09* 0102.10* 0102.13* 0102.15* 0104.16* 0104.23* 0104.31* 0104.32*
0104.33* 0104.35* 0105.18* 0108.08* 0109.02* 0109.05* 0111.12* 0112.07* 0112.09* 0112.12* 0112.13*

Income Not Known

0104.37* 0108.06* 9900.00*

OUTSIDE ASSESSMENT AREA

ALACHUA COUNTY (001), FL

MSA: 23540

Moderate Income

0003.02

CLAY COUNTY (019), FL

MSA: 27260

Middle Income

0309.05

DUVAL COUNTY (031), FL

MSA: 27260

Median Family Income 30-40%

0174.00

2023 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

* denotes no loans made in specified tracts

Agency: FRS - 2

Institution: COMERICA BANK

ESCAMBIA COUNTY (033), FL

MSA: 37860

Upper Income

0001.00 0026.06

HIGHLANDS COUNTY (055), FL

MSA: 42700

Income Not Known

9802.00

HILLSBOROUGH COUNTY (057), FL

MSA: 45300

Median Family Income 60-70%

0133.17

Median Family Income 70-80%

0114.14

Median Family Income 100-110%

0017.00

Median Family Income >= 120%

0071.02

INDIAN RIVER COUNTY (061), FL

MSA: 42680

Upper Income

0505.05

LAKE COUNTY (069), FL

MSA: 36740

Middle Income

0313.24

LEE COUNTY (071), FL

MSA: 15980

2023 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

*** denotes no loans made in specified tracts**

Agency: FRS - 2

Institution: COMERICA BANK

Median Family Income 40-50%

0006.00

Median Family Income 60-70%

0013.00 0401.34

Median Family Income >= 120%

0401.13 0401.38

Median Family Income Not Known

0801.00

MARTIN COUNTY (085), FL

MSA: 38940

Low Income

0012.00

Upper Income

0007.01 0015.00 0016.01

MIAMI-DADE COUNTY (086), FL

MSA: 33124

Median Family Income 50-60%

0005.05

Median Family Income 60-70%

0091.02

Median Family Income 90-100%

0044.05 0090.64

Median Family Income 100-110%

0090.66

Median Family Income >= 120%

0027.07 0037.10 0046.02 0067.13 0067.18 0067.20 0074.01

MONROE COUNTY (087), FL

MSA: NA

Upper Income

2023 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

Respondent ID: 0000060143

*** denotes no loans made in specified tracts**

Agency: FRS - 2

Institution: COMERICA BANK

9728.00

ORANGE COUNTY (095), FL

MSA: 36740

Median Family Income 50-60%

0150.01

Median Family Income 60-70%

0135.07 0170.22

PINELLAS COUNTY (103), FL

MSA: 45300

Median Family Income 90-100%

0244.10

Median Family Income 100-110%

0245.12 0273.27

Median Family Income >= 120%

0215.01

POLK COUNTY (105), FL

MSA: 29460

Median Family Income >= 120%

0115.02

ST. JOHNS COUNTY (109), FL

MSA: 27260

Upper Income

0208.04

SARASOTA COUNTY (115), FL

MSA: 35840

Upper Income

0027.25 0027.26

SEMINOLE COUNTY (117), FL

2023 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

* denotes no loans made in specified tracts

Institution: COMERICA BANK

Respondent ID: 0000060143

Agency: FRS - 2

MSA: 36740

Moderate Income

0220.01

Upper Income

0208.05

WALTON COUNTY (131), FL

MSA: 18880

Upper Income

9506.07

2023 Institution Disclosure Statement - Table E-1

Error Status Information

Respondent ID: 0000060143

Institution: COMERICA BANK

Agency: FRS - 2

Record Identifier: ¹¹	Total Composite Records on File	Total Composite Records Without Errors	Total Validity¹⁰ Errors	Percentage of Validity Errors
Transmittal Sheet	1	1	0	0.00%
Small Business Loans	3,681	3,681	0	0.00%
Small Farm Loans	25	25	0	0.00%
Community Development Loans	1	1	0	0.00%
Consortium/Third Party Loans (Optional)	0	0	0	0.00%
Assessment Area	14,647	14,647	0	0.00%
Total	18,355	18,355	0	0.00%

Footnote:

10. A validity edit helps to verify the accuracy of the data reported. An institution's CRA submission that passes all validity edits does not ensure 100% accurate data. True accuracy is determined during the examination process.

11. A record represents one row of data reported to the Federal Reserve Board. This does not in any way represent the number of loans originated or purchased by the institution.



Home Mortgage Disclosure Act Notice

The Home Mortgage Disclosure Act (HMDA) data about our residential mortgage lending are available online for review. The data shows geographic distribution of loans and applications; ethnicity, race, sex, age and income of applicants and borrowers; and information about loan approvals and denials. The data is available online at the Consumer Financial Protection Bureau's (CFPB) website (<https://www.consumerfinance.gov/data-research/hmda/>). HMDA data for many other financial institutions are also available on the CFPB website.