

# CRA Public File

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**Public Comments**

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

**2024 – 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** take 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 1<sup>st</sup> 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 Improve”
- 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 14<sup>th</sup> 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 -14<sup>th</sup> 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]  
[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.

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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.

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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 1<sup>st</sup> 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 – 14<sup>th</sup> 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 1<sup>st</sup> 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 – 14<sup>th</sup> 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 – 14<sup>th</sup> 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:

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--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 -----

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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 pittance 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 at 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](mailto: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]  
[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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[REDACTED]  
Coordinator - Mergers & Acquisitions  
Banking Supervision  
[REDACTED]  
[dal.frb.org](mailto:[REDACTED]@dal.frb.org)

Federal Reserve Bank of Dallas  
2200 N. Pearl St., Dallas, TX 75201  
[dallasfed.org](http://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:

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--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 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 **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 reverse 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 [REDACTED] 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 – 14<sup>th</sup> 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, 75025, 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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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.

December 14, 2022

*Via FedEZFile*

[REDACTED]  
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 [REDACTED]

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. [REDACTED] in his correspondence to your office. As a preliminary matter, we note that the issues raised by [REDACTED] in his letter dated November 21, 2022 are substantively the same issues that [REDACTED] has raised in prior letters to the Federal Reserve Bank of Dallas (“FRB”) regarding Applicant.

#### Fair Lending Concerns

In his letter, [REDACTED] makes several broad assertions accusing Applicant of violations of federal fair lending laws. [REDACTED] 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 2021<sup>1</sup>, 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

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<sup>1</sup> 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

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[www.comerica.com/cra](http://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



2019



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



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 manner.



## 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 programing 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

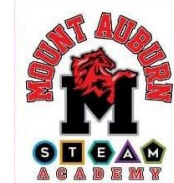
The NAACP Dallas has a commitment to those within low and moderate socio-economic communities. Comerica supports the NAACP ACT-SO (Afro-Academic Cultural Technological Scientific Olympics) and Youth Council focus on leadership development, as well as academic achievement that prepares students in STEM, 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



DALLAS BLACK  
CHAMBER OF COMMERCE



NAACP  
DALLAS



# 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.





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# 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 2025 BANKING CENTER LOCATIONS AZ CRA ASSESSMENT AREAS AS OF 4/1/2025									
MSA Name	CRA Name	Branch	Location	Address	City, State, Zip	County	Census Tract	Income Level	Minority*
PHOENIX-MESA-CHANDLER	PHOENIX	992	Avondale-McDowell	10115 W McDowell Rd	Avondale, AZ 85392	MARICOPA	0820.24	MODERATE	Y
PHOENIX-MESA-CHANDLER	PHOENIX	991	Mesa-Riverview	925 N Dobson Rd	Mesa, AZ 85201	MARICOPA	4212.01	MODERATE	N
PHOENIX-MESA-CHANDLER	PHOENIX	546	Phoenix-44th & Thomas	2804 N 44th St	Phoenix, AZ 85008	MARICOPA	1113.00	MODERATE	Y
PHOENIX-MESA-CHANDLER	PHOENIX	956	North Central Phoenix	3200 N Central Ave	Phoenix, AZ 85012	MARICOPA	1105.01	MODERATE	N
PHOENIX-MESA-CHANDLER	PHOENIX	833	Mesa-Val Vista	1825 S Val Vista Dr	Mesa, AZ 85204	MARICOPA	4225.14	MIDDLE	N
PHOENIX-MESA-CHANDLER	PHOENIX	566	75th Ave and Thunderbird	7525 West Thunderbird Road	Peoria, AZ 85381	MARICOPA	0715.12	MIDDLE	N
PHOENIX-MESA-CHANDLER	PHOENIX	556	20th Street & Camelback	1959 E Camelback Rd	Phoenix, AZ 85016	MARICOPA	1085.01	MIDDLE	N
PHOENIX-MESA-CHANDLER	PHOENIX	555	Bell & Bullard	14211 W Bell Rd	Surprise, AZ 85374	MARICOPA	0610.28	MIDDLE	N
PHOENIX-MESA-CHANDLER	PHOENIX	572	Goodyear-Estrella Falls Mall	1831 N Pebble Creek Pkwy	Goodyear, AZ 85395	MARICOPA	0610.54	UPPER	N
PHOENIX-MESA-CHANDLER	PHOENIX	990	Phoenix-Happy Valley	2025 W Happy Valley Rd	Phoenix, AZ 85085	MARICOPA	6123.01	UPPER	N
PHOENIX-MESA-CHANDLER	PHOENIX	570	Scottsdale-McDowell	7170 E McDowell Rd	Scottsdale, AZ 85257	MARICOPA	2180.00	UPPER	N
PHOENIX-MESA-CHANDLER	PHOENIX	834	Scottsdale-Greenway	14801 N Scottsdale Rd	Scottsdale, AZ 85254	MARICOPA	2168.16	UPPER	N
TOTAL NUMBER OF BANKING CENTERS: 12									

## Arizona Banking Center Hours as of 4.1.2025

BC Number	BC Name	Address	City	State	Zip Code	Lobby		Lobby Sat	DT Mon-Thurs	DT Fri	DT Sat	Region	District
						Mon-Thurs	Fri						
546	Phoenix - 44th & Thomas	2804 N. 44th St	Phoenix	AZ	85008	9-5	9-5	Closed	9-5	9-5	Closed	North Texas/Arizona/Florida	Arizona
555	Surprise - Bell & Bullard	14211 W. Bell Road	Surprise	AZ	85374	9-5	9-5	9-12	9-5	9-5	9-12	North Texas/Arizona/Florida	Arizona
556	20th & Camelback	1959 E. Camelback Rd	Phoenix	AZ	85016	9-5	9-5	9-12	9-5	9-5	9-12	North Texas/Arizona/Florida	Arizona
566	75th & Thunderbird	7525 West Thunderbird Rd	Peoria	AZ	85381	9-5	9-5	Closed	N/A	N/A	N/A	North Texas/Arizona/Florida	Arizona
570	Scottsdale - McDowell	7170 E. McDowell Rd.	Scottsdale	AZ	85257	9-5	9-5	Closed	9-5	9-5	Closed	North Texas/Arizona/Florida	Arizona
572	Goodyear - Estrella Falls Mall	1831 N. Pebble Creek Parkway	Goodyear	AZ	85395	9-5	9-5	Closed	9-5	9-5	Closed	North Texas/Arizona/Florida	Arizona
833	Mesa-Val Vista	1825 S. Val Vista Drive	Mesa	AZ	85204	9-5	9-5	9-12	N/A	N/A	N/A	North Texas/Arizona/Florida	Arizona
834	Scottsdale-Greenway	14801 N. Scottsdale Rd	Scottsdale	AZ	85254	9-5	9-5	9-12	9-5	9-5	9-12	North Texas/Arizona/Florida	Arizona
956	North Central Phoenix	3200 N. Central Ave., Suite 100	Phoenix	AZ	85012	9-5	9-5	Closed	N/A	N/A	N/A	North Texas/Arizona/Florida	Arizona
990	Phoenix - Happy Valley	2025 W. Happy Valley Rd.	Phoenix	AZ	85085	9-5	9-5	Closed	9-5	9-5	Closed	North Texas/Arizona/Florida	Arizona
991	Mesa Riverview	925 N. Dobson Road	Mesa	AZ	85201	9-5	9-5	9-12	9-5	9-5	9-12	North Texas/Arizona/Florida	Arizona
992	Avondale - McDowell	10115 W. McDowell Road	Avondale	AZ	85392	9-5	9-5	9-12	9-5	9-5	9-12	North Texas/Arizona/Florida	Arizona

**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 AZ CRA ASSESSMENT AREAS JANUARY 1, 2023 - APRIL 1, 2025										
MSA Name	CRA Name	Branch	Location	Address	City, State, Zip	County	Census Tract	Income Level	Minority*	Year Closed
PHOENIX-MESA-CHANDLER	PHOENIX	549	Scottsdale-Riverwalk	4545 N Scottsdale Rd	Scottsdale, AZ 85251	MARICOPA	2172.03	MIDDLE	N	2024
PHOENIX-MESA-CHANDLER	PHOENIX	552	Mesa-Gateway	5225 S Power Rd	Mesa, AZ 85212	MARICOPA	8152.01	UPPER	N	2024
PHOENIX-MESA-CHANDLER	PHOENIX	837	Cactus and Tatum	4707 E Cactus Rd	Phoenix, AZ 85032	MARICOPA	1032.09	UPPER	N	2024
PHOENIX-MESA-CHANDLER	PHOENIX	935X	Phoenix-Downtown	1 N Central Ave	Phoenix, AZ 85004	MARICOPA	1141.00	UPPER	Y	2024
PHOENIX-MESA-CHANDLER	PHOENIX	553	Tempe-Mill	425 S Mill Ave	Tempe, AZ 85281	MARICOPA	3187.00	UPPER	N	2023
TOTAL NUMBER OF BANKING CENTERS CLOSED: 5										



## CRA Product and Service List

Comerica Bank provides the following deposit and loan products. For fee information, please request a copy of our Personal Services and Charges brochure or Business Account Service Charges and Interest Information brochure.

### **I. DEPOSIT PRODUCTS**

#### Personal Accounts:

- Comerica Personal Checking Accounts
- Comerica ATM/Debit Card
- Savings Accounts
- Money Market Investment Accounts
- Certificate of Deposit (CD)
- Individual Retirement Account (IRA)
- Education Savings Account (ESA)
- Check and Save (Transfers)
- Overdraft Protection
- Wire Transfer
- Stop Payment
- Telephone Banking (IVR)
- Online Services
  - Comerica Web Banking
  - Comerica Web Bill Pay
  - Mobile Banking
  - Quicken Banking
  - Quicken Banking with Bill Pay
  - Zelle®
- Cashier's Checks
- Safe Deposit Box

#### Business Accounts:

- Comerica Business Checking Accounts
- Business ATM / Debit Cards
- Business Money Market Accounts
- Certificate of Deposit (CD)
- Business Sweep Account
- Zero Balance Account (ZBA)
- Overdraft Protection
- Wire Transfer
- Stop Payment
- Business Online Services
  - Business Web Banking / Business Comerica Web Bill Pay
  - Quicken Business Banking
  - Quicken Business Banking with Bill Pay
  - QuickBooks Banking
  - QuickBooks Banking with Bill Pay
  - Zelle®
- Returned Item Handling
- Money Service Business (MSB)
- Night Deposit
- Positive Pay
- ACH Processing

### **II. LOAN PRODUCTS**

- Comerica Credit Card
- Small Business Credit Card
- Mortgage Loans
- Home Equity Line of Credit (HELOC) – FlexLine®
- Small Business Loans & Lines

## Loans by County

## Small Business Loans - Originations

Institution: COMERICA BANK

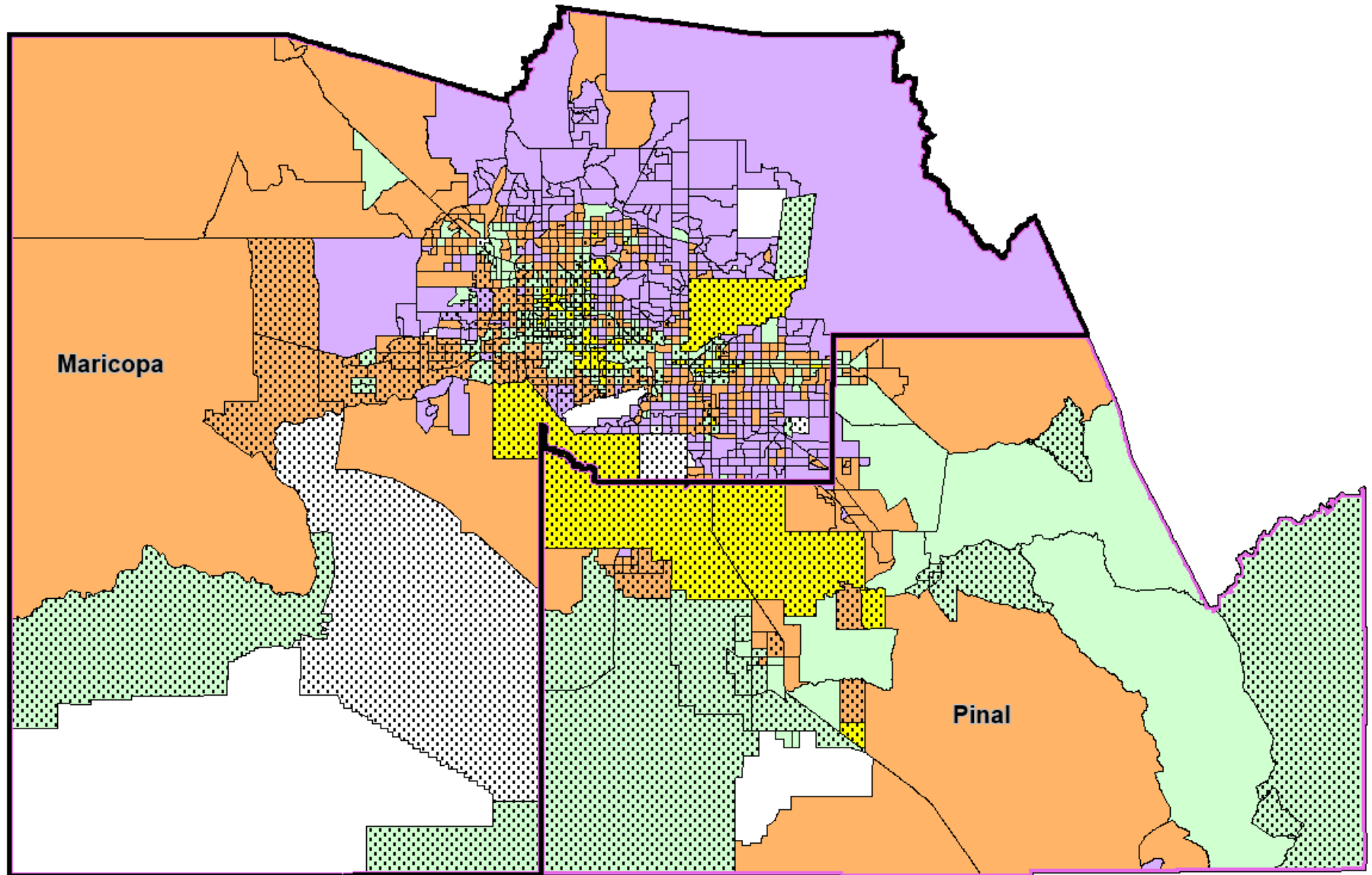
Respondent ID: 0000060143

Agency: FRS - 2

State: ARIZONA (04)

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)
<b>APACHE COUNTY (001), AZ</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
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	1,000	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
<b>MARICOPA COUNTY (013), AZ</b>										
<b>MSA 38060</b>										
<b>Inside AA 0019</b>										
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	1,000	2	1,000	0	0
Median Family Income 40-50%	2	200	4	888	0	0	2	488	0	0
Median Family Income 50-60%	8	410	4	800	4	2,155	4	195	0	0
Median Family Income 60-70%	2	75	2	445	3	1,950	1	25	0	0
Median Family Income 70-80%	5	283	0	0	1	300	3	170	0	0
Median Family Income 80-90%	5	323	2	400	5	3,305	7	1,603	0	0
Median Family Income 90-100%	2	200	1	150	2	850	1	100	0	0
Median Family Income 100-110%	5	381	2	481	4	2,650	3	372	0	0
Median Family Income 110-120%	2	140	4	650	0	0	1	65	0	0
Median Family Income ≥ 120%	12	710	7	1,195	16	9,721	16	6,045	0	0
Median Family Income Not Known	1	50	0	0	1	300	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	44	2,772	26	5,009	38	22,231	40	10,063	0	0

# PHOENIX ASSESSMENT AREA—PHOENIX-MESA-CHANDLER, AZ MSA



## Geography

- Assessment Area
- County

## % Minority

- High 50% - 101%
- Low 0% - 49.99%

## Tract Income Level

- Low (<50%)
- Moderate (50% - <80%)
- Middle (80% - <120%)
- Upper (120%>)

NA

**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	1167.08	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1167.20	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1167.19	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.18	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	1167.17	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1167.15	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.14	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.13	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.12	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.11	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2168.16	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.09	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1167.27	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.07	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1166.21	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1166.20	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1166.19	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	1166.18	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1166.17	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1166.16	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1166.15	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1166.14	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1167.10	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.37	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	1130.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.10	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2168.09	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.07	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.06	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1173.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1172.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1171.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1170.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y

\*MINORITY: "Y" = 50% OR GREATER

**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	1169.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1167.21	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.38	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1167.25	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.36	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1167.35	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1167.34	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1167.33	38060	PHOENIX-MESA-CHANDLER	NA	N
PHOENIX	04	013	1167.32	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1167.31	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.30	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.29	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1167.28	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1166.10	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	1168.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1137.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1166.12	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1146.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1145.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1144.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1144.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1143.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1143.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1142.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1141.00	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	1140.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1147.05	38060	PHOENIX-MESA-CHANDLER	NA	N
PHOENIX	04	013	1138.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1148.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1137.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1136.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1136.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1135.03	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1135.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y

\*MINORITY: "Y" = 50% OR GREATER

**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	1133.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1132.04	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1132.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1132.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	4201.07	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1139.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1160.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	2168.19	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1166.07	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1166.06	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1166.05	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1165.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1164.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1163.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1162.05	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1162.04	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1162.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1147.04	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1161.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1166.11	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	1159.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1158.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1158.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1157.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1156.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1155.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1154.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1153.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1152.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1149.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1162.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	3190.01	38060	PHOENIX-MESA-CHANDLER	NA	N
PHOENIX	04	013	3194.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	3194.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N

\*MINORITY: "Y" = 50% OR GREATER

**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	3194.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	3194.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	3193.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	3192.02	38060	PHOENIX-MESA-CHANDLER	NA	Y
PHOENIX	04	013	3192.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	3191.04	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	3191.03	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	2168.13	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	3190.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	3197.05	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	3189.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	3188.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	3187.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	3185.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	3184.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	2183.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	2182.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2181.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2180.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2179.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	3191.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	3199.04	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1033.03	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4201.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	3201.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	3200.07	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	3200.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	3200.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	3199.10	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	3199.09	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	3199.08	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	3199.07	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	3195.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	3199.05	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N

\*MINORITY: "Y" = 50% OR GREATER

**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	3196.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	3199.03	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	3199.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	3198.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	3198.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	3197.10	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	3197.09	38060	PHOENIX-MESA-CHANDLER	NA	NA
PHOENIX	04	013	3197.08	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	3197.07	38060	PHOENIX-MESA-CHANDLER	NA	Y
PHOENIX	04	013	3197.06	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	2176.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	3199.06	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.35	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2178.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2168.49	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.45	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	2168.44	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.43	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.42	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.41	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.40	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.39	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.38	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.51	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.36	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.52	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2168.34	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.33	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2168.32	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.31	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.30	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2168.29	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.26	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2168.22	38060	PHOENIX-MESA-CHANDLER	UPPER	N

\*MINORITY: "Y" = 50% OR GREATER

**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	2168.21	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.20	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.37	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2169.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1129.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	2175.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2175.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	2174.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2173.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2172.04	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	2172.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2172.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2171.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2171.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2168.50	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2170.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2177.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2169.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.61	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.60	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.59	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.58	38060	PHOENIX-MESA-CHANDLER	NA	NA
PHOENIX	04	013	2168.57	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	2168.56	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.55	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.54	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2168.53	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	2170.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1053.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1060.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1059.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1058.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1057.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1057.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	1056.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1056.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1055.03	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1055.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1074.04	38060	PHOENIX-MESA-CHANDLER	NA	Y
PHOENIX	04	013	1054.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1061.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1052.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1051.03	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1051.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1051.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1050.04	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1050.03	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1050.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1049.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1048.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1048.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1055.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1068.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1131.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1074.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1074.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1073.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1072.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1072.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1071.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1071.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1070.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1070.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1060.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1068.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1060.03	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1067.03	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1067.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N

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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	1067.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1066.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1065.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1065.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1064.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1063.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1062.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1046.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1069.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1036.08	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1047.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1042.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1041.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	1040.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1039.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1037.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1037.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	1036.15	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1036.14	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1036.12	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1036.09	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	1042.05	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1036.07	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1036.06	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1036.05	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1036.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1035.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1035.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1034.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1033.06	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1033.05	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1033.04	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1036.11	38060	PHOENIX-MESA-CHANDLER	UPPER	N

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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	1042.22	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1075.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1045.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1045.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1044.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1044.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1043.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1043.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	1042.27	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	1042.26	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.25	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.23	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1047.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.21	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.19	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.18	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	1042.17	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.16	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.15	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.14	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.12	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.07	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1042.06	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1042.24	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1113.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1122.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1121.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1119.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1118.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1117.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1116.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1116.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1115.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	1115.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1074.03	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1114.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1123.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1112.04	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1112.03	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1112.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1112.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1111.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1110.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1109.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	1109.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	1108.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1108.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1114.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.15	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1127.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1126.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1126.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1125.24	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.23	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.22	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.21	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.20	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.19	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.18	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1122.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.16	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1123.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.14	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.12	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.10	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1125.08	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.07	38060	PHOENIX-MESA-CHANDLER	LOW	Y

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	1125.04	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1125.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1124.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1124.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1106.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1125.17	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1084.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1107.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1091.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1090.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1090.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1090.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1089.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1089.01	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	1088.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	1086.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1086.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1092.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1085.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1093.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1083.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1083.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1082.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1081.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1080.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1079.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1078.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1077.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1076.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1076.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1085.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1097.05	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	4201.08	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1105.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N

\*MINORITY: "Y" = 50% OR GREATER

**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	1105.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	1104.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1101.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1100.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1100.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1099.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1098.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1098.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1091.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1097.06	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1107.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1097.04	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1097.03	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1097.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1096.04	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1096.03	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1096.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1096.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1095.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1094.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1094.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1097.07	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	6181.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6192.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	6191.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	6190.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	6189.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6188.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	6187.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6186.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6185.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	6184.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	8110.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6182.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N

\*MINORITY: "Y" = 50% OR GREATER

**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	6195.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	6180.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6179.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6178.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6177.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6176.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6175.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6174.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	6173.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6172.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6171.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6183.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	7233.09	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6125.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8108.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8107.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8106.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8105.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8104.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8103.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8102.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8101.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8100.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6193.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	7233.10	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6194.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	7233.07	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	7233.06	38060	PHOENIX-MESA-CHANDLER	NA	Y
PHOENIX	04	013	7233.05	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	7233.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6199.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6198.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6197.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6196.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N

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**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	6196.01	38060	PHOENIX-MESA-CHANDLER	NA	NA
PHOENIX	04	013	6169.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	7233.11	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6136.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6170.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6146.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6145.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6144.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6143.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6142.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6141.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6140.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6139.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6138.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6147.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	6136.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6148.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6135.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6134.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6133.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6132.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6131.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6130.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6129.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6128.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6127.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4201.05	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6137.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6157.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8111.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6168.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6167.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6166.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6165.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N

\*MINORITY: "Y" = 50% OR GREATER

**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	6164.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6163.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6162.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6161.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6160.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6146.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6158.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6170.01	38060	PHOENIX-MESA-CHANDLER	NA	N
PHOENIX	04	013	6156.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6155.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	6154.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	6153.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	6152.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6152.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6151.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6150.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6150.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6149.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6159.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8160.05	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8168.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8167.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8166.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8165.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8165.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8164.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8164.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8163.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8163.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8109.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8161.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8169.03	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8160.04	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8160.03	38060	PHOENIX-MESA-CHANDLER	UPPER	N

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**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	8160.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8160.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8159.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8159.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8158.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8157.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8156.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8156.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8162.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8176.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0101.03	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	9810.00	38060	PHOENIX-MESA-CHANDLER	NA	N
PHOENIX	04	013	9809.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	9807.00	38060	PHOENIX-MESA-CHANDLER	NA	NA
PHOENIX	04	013	9805.00	38060	PHOENIX-MESA-CHANDLER	NA	NA
PHOENIX	04	013	9804.00	38060	PHOENIX-MESA-CHANDLER	NA	Y
PHOENIX	04	013	9801.00	38060	PHOENIX-MESA-CHANDLER	NA	N
PHOENIX	04	013	9413.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	9412.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	9411.00	38060	PHOENIX-MESA-CHANDLER	NA	Y
PHOENIX	04	013	8169.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	9407.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	8169.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8175.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8174.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8173.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8172.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8171.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8171.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8171.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8170.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8169.04	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8154.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	9410.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y

\*MINORITY: "Y" = 50% OR GREATER

**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	8122.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8155.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8132.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8131.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8130.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8129.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8128.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8128.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8127.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8126.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8125.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8134.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8123.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8135.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8121.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8120.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	8119.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8118.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8117.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8116.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8115.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8114.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8113.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8112.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	8124.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8146.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6124.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8154.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8153.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8152.03	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8152.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8152.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8151.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8150.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N

\*MINORITY: "Y" = 50% OR GREATER

**COMERICA BANK**  
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**ARIZONA**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	8149.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8148.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8133.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8147.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8155.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8145.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8144.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8143.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8142.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8141.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8140.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8139.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8138.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	8137.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	8136.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	8148.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4219.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	4222.10	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4222.09	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	4222.03	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4221.07	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	4221.06	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4221.05	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4221.04	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4221.03	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4221.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	4224.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4220.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4222.13	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4219.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4218.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4218.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	4217.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	4217.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	4216.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	4216.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4215.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4215.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4214.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4220.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4222.24	38060	PHOENIX-MESA-CHANDLER	NA	NA
PHOENIX	04	013	6126.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4224.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4223.09	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4223.08	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4223.07	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4223.05	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4223.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4223.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4223.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4222.27	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4222.11	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4222.25	38060	PHOENIX-MESA-CHANDLER	NA	NA
PHOENIX	04	013	4222.12	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4222.23	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4222.22	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4222.21	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4222.20	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4222.19	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4222.18	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4222.17	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4222.16	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4222.15	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4213.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	4222.26	38060	PHOENIX-MESA-CHANDLER	NA	NA
PHOENIX	04	013	4202.09	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4213.04	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4203.04	38060	PHOENIX-MESA-CHANDLER	UPPER	N

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	4203.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4203.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4203.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4202.16	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4202.15	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4202.14	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4202.13	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4202.12	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4204.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4202.10	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4205.03	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4202.08	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4202.07	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4202.06	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4202.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4201.16	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4201.15	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4201.14	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4201.13	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4201.12	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4201.10	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4202.11	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4207.08	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4224.04	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4212.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	4212.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4211.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4211.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4210.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	4210.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4209.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4209.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	4208.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4204.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	4207.09	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4213.03	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4207.07	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4207.06	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4207.05	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4207.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4206.04	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4206.03	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4206.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4205.06	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	4205.05	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	4205.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4207.10	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	5230.05	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6102.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6102.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6101.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6100.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6100.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	5231.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	5231.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	5231.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	5230.08	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	4224.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	5230.06	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	6104.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	5230.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	5229.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	5229.03	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	5229.01	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	5228.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	5228.01	38060	PHOENIX-MESA-CHANDLER	NA	Y
PHOENIX	04	013	4226.60	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.59	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	4226.58	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.57	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	5230.07	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	6112.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6124.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6123.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6123.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6122.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6120.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6119.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6118.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6117.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6116.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6115.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6103.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6113.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6103.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6111.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6110.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6109.03	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6109.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6109.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6108.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6107.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	6106.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6105.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.54	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	6114.00	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4225.12	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.56	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.22	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.21	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.20	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.18	38060	PHOENIX-MESA-CHANDLER	MODERATE	N

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	4226.17	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.15	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.10	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4226.09	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.07	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.24	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4225.13	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.25	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4225.11	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4225.10	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4225.09	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4225.08	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4225.07	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4225.06	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4225.04	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4225.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4225.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4225.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4225.14	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.38	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4201.09	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.53	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.52	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.51	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.50	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.49	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.48	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.47	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.43	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.42	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.23	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4226.39	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.55	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.37	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N

\*MINORITY: "Y" = 50% OR GREATER

**COMERICA BANK**  
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**ARIZONA**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	4226.36	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.34	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4226.33	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4226.32	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.30	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4226.29	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	4226.28	38060	PHOENIX-MESA-CHANDLER	LOW	N
PHOENIX	04	013	4226.27	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4226.26	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	4226.40	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.27	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0609.04	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0610.40	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0610.39	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0610.38	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.37	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0610.36	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0610.35	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0610.34	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.33	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.32	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.31	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.42	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.28	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.43	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0610.26	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0610.24	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0610.21	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	0610.20	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0610.18	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.17	38060	PHOENIX-MESA-CHANDLER	NA	N
PHOENIX	04	013	0610.15	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0610.14	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0610.13	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	0610.11	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	0614.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0610.29	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.55	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	0614.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	0613.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0612.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0611.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0610.64	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0610.63	38060	PHOENIX-MESA-CHANDLER	NA	Y
PHOENIX	04	013	0610.62	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.61	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.60	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.59	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0610.58	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0610.41	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0610.56	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0609.03	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0610.54	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0610.53	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0610.52	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0610.51	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0610.50	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0610.49	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0610.48	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0610.47	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	0610.46	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0610.45	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0610.44	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.57	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0405.15	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0610.10	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0405.31	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0405.30	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	0101.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0405.29	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.28	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0405.27	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.26	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.25	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.24	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.23	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.33	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0405.16	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.34	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0405.14	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.13	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.12	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.07	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.06	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0405.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0304.02	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0304.01	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0101.04	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	4201.11	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1033.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.22	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0506.14	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0609.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0609.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0608.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0608.01	38060	PHOENIX-MESA-CHANDLER	NA	Y
PHOENIX	04	013	0507.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0507.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0506.21	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0506.20	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0506.19	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0506.18	38060	PHOENIX-MESA-CHANDLER	UPPER	N

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	0506.17	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0405.32	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0506.15	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0506.12	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0506.13	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0506.11	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0506.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0506.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.41	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0405.40	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.39	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.38	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0405.37	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0405.36	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0405.35	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0506.16	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0926.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	0822.13	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0927.19	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0927.18	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	0927.17	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0927.16	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0927.15	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0927.13	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0927.12	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0927.11	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0927.10	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0927.09	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0927.21	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	0927.05	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0927.23	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0925.00	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0924.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0924.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	0923.12	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0923.11	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0923.09	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0923.08	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0923.07	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0923.06	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0923.05	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0830.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0927.08	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	1032.07	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0506.09	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0715.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	1032.20	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1032.19	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1032.17	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1032.16	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1032.15	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1032.14	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1032.12	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1032.11	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1032.10	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0927.20	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	1032.08	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0930.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	1032.06	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	1032.05	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0932.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0931.06	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0931.05	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	0931.04	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	0930.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0929.00	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	0928.02	38060	PHOENIX-MESA-CHANDLER	LOW	Y
PHOENIX	04	013	0928.01	38060	PHOENIX-MESA-CHANDLER	LOW	Y

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**COMERICA BANK**  
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ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	0927.24	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	1032.09	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0715.16	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0719.15	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0719.14	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0719.13	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0719.12	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0719.11	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0719.10	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0719.09	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0719.06	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0719.03	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0718.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0718.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0820.02	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0716.00	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0717.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0715.15	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0715.14	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0715.13	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0715.12	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0715.11	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0715.10	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0715.09	38060	PHOENIX-MESA-CHANDLER	UPPER	N
PHOENIX	04	013	0715.06	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0822.12	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0931.01	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0715.05	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0715.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0717.02	38060	PHOENIX-MESA-CHANDLER	MODERATE	N
PHOENIX	04	013	0820.26	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0822.11	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	0822.09	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0822.08	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y

\*MINORITY: "Y" = 50% OR GREATER

**COMERICA BANK**  
**CENSUS TRACT LISTINGS**  
**ARIZONA**  
**CRA ASSESSMENT AREA**

ASSESSMENT AREA	STATE	COUNTY	CENSUS TRACT	MSA/MD	MSA NAME	TRACT INCOME LEVEL	*MINORITY
PHOENIX	04	013	0715.17	38060	PHOENIX-MESA-CHANDLER	MIDDLE	N
PHOENIX	04	013	0820.07	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0822.07	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0822.06	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0822.05	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0822.04	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0822.10	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0820.27	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0820.25	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0820.24	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0820.23	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0820.17	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0820.08	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0820.09	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0820.10	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0820.12	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0820.28	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0820.16	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0820.22	38060	PHOENIX-MESA-CHANDLER	MODERATE	Y
PHOENIX	04	013	0820.18	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0820.19	38060	PHOENIX-MESA-CHANDLER	UPPER	Y
PHOENIX	04	013	0820.20	38060	PHOENIX-MESA-CHANDLER	MIDDLE	Y
PHOENIX	04	013	0820.21	38060	PHOENIX-MESA-CHANDLER	UPPER	Y

\*MINORITY: "Y" = 50% OR GREATER

## Loans by County

## Small Business Loans - Originations

Institution: COMERICA BANK

Respondent ID: 0000060143

Agency: FRS - 2

State: ARIZONA (04)

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)
<b>PINAL COUNTY (021), AZ</b>										
<b>MSA 38060</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	1	150	0	0	1	150	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	1	150	0	0	1	150	0	0
<b>YUMA COUNTY (027), AZ</b>										
<b>MSA 49740</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	1	75	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	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	75	0	0	0	0	0	0	0	0
TOTAL INSIDE AA IN STATE	44	2,772	26	5,009	38	22,231	40	10,063	0	0
TOTAL OUTSIDE AA IN STATE	1	75	1	150	1	1,000	1	150	0	0
STATE TOTAL	45	2,847	27	5,159	39	23,231	41	10,213	0	0

## Loans by County

## Small Business Loans - Purchases

Institution: COMERICA BANK

Respondent ID: 0000060143

Agency: FRS - 2

State: ARIZONA (04)

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)
<b>MARICOPA COUNTY (013), AZ</b>										
<b>MSA 38060</b>										
<b>Inside AA 0019</b>										
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%	1	22	0	0	0	0	1	22	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	22	0	0	0	0	1	22	0	0
TOTAL INSIDE AA IN STATE	1	22	0	0	0	0	1	22	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
STATE TOTAL	1	22	0	0	0	0	1	22	0	0

## 2022 Institution Disclosure Statement - Table 2-1

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## Loans by County

## Small Farm Loans - Originations

Institution: COMERICA BANK

Respondent ID: 0000060143

Agency: FRS - 2

State: ARIZONA (04)

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 Farms 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)
<b>MARICOPA COUNTY (013), AZ</b>										
<b>MSA 38060</b>										
<b>Inside AA 0019</b>										
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%	1	90	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	90	0	0	0	0	0	0	0	0
TOTAL INSIDE AA IN STATE	1	90	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
STATE TOTAL	1	90	0	0	0	0	0	0	0	0

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

PAGE: 1 OF 3

**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**

PAGE: 2 OF 3

**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 - LENAWEЕ 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

PAGE: 3 OF 3  
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**

**Respondent ID: 0000060143**  
**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**

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**Assessment Area(s) by Tract****Respondent ID: 0000060143****\* denotes no loans made in specified tracts****Agency: FRS - 2****Institution: COMERICA BANK**

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**ASSESSMENT AREA - 0019****MARICOPA COUNTY (013), AZ****MSA: 38060****Median Family Income 20-30%**

1074.03\* 1133.01\* 1139.00\* 1173.00\*

**Median Family Income 30-40%**

0928.01\* 1060.02\* 1068.01\* 1072.01\* 1090.01\* 1090.02\* 1092.00\* 1126.01\* 1132.02\* 1142.00 1143.02\*

1149.00\* 1153.00\* 4219.02\* 4221.02\*

**Median Family Income 40-50%**

0614.01\* 0926.00\* 0927.18\* 0928.02\* 0929.00\* 0930.01\* 0931.04 0931.05\* 1033.06\* 1036.15\* 1043.02\*

1045.02\* 1055.01\* 1055.02\* 1056.02\* 1067.01\* 1073.00\* 1094.01\* 1097.07\* 1098.01\* 1112.02 1125.07\*

1129.00\* 1132.01\* 1135.02\* 1144.01\* 1146.00\* 1147.04 1148.00\* 1154.00\* 1158.01\* 1165.00\* 1168.00

3191.03\* 3192.01\* 4210.02\* 4213.02\* 4216.02\* 4217.02\* 4221.07\* 4226.28\* 5229.03\* 6188.00\* 9410.00\*

9413.00\*

**Median Family Income 50-60%**

0405.41\* 0609.02\* 0612.00\* 0716.00\* 0718.01\* 0718.02\* 0719.12\* 0820.08\* 0923.11\* 0924.02 0927.17\*

1033.04\* 1033.05\* 1036.09\* 1042.05\* 1045.01\* 1047.02\* 1055.03 1060.01\* 1071.02\* 1096.01\* 1096.02\*

1097.02\* 1097.03\* 1097.04\* 1097.06\* 1101.00 1107.01\* 1109.02\* 1112.03\* 1115.02\* 1121.00\* 1123.01\*

1123.02\* 1124.01\* 1125.19\* 1125.21\* 1125.22\* 1125.23\* 1125.24\* 1126.02\* 1127.00\* 1135.03\* 1136.01\*

1136.02\* 1137.01\* 1138.00 1140.00 1143.01 1145.00\* 1155.00\* 1161.00\* 1162.04\* 1166.15\* 1167.35\*

1169.00 1170.00\* 1172.00\* 2168.45\* 3185.01\* 3191.01\* 3191.04\* 4201.13\* 4205.03\* 4207.08\* 4210.01\*

4213.03\* 4215.01\* 4217.01\* 4218.02\* 4220.01 4220.02\* 4221.03\* 4221.04\* 4221.06\* 4226.33 6147.00

6191.00\* 6192.00\* 7233.05\* 9407.00\*

**Median Family Income 60-70%**

0507.02\* 0609.04\* 0611.00\* 0614.02\* 0717.02\* 0719.10\* 0719.13\* 0820.07\* 0830.00 0923.05\* 0924.01\*

0927.05 0931.01\* 0932.00\* 1039.00\* 1041.00\* 1042.06\* 1044.01 1060.03\* 1072.02\* 1086.01\* 1088.02\*

1089.02\* 1091.01\* 1094.02\* 1096.03\* 1096.04\* 1098.02\* 1099.00\* 1100.01\* 1116.01\* 1116.02\* 1122.01\*

1122.02\* 1125.02\* 1125.04\* 1125.08\* 1125.16\* 1125.20\* 1144.02\* 1152.00\* 1156.00\* 1159.00\* 1160.00\*

1162.05\* 2172.04\* 2183.00\* 3188.00\* 3193.00\* 3197.05\* 3200.02\* 4201.15\* 4201.16\* 4202.14\* 4205.06\*

**2022 Institution Disclosure Statement - Table 6**

PAGE: 2 OF 5

**Assessment Area(s) by Tract****Respondent ID: 0000060143****\* denotes no loans made in specified tracts****Agency: FRS - 2****Institution: COMERICA BANK**

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4207.07\* 4207.09\* 4207.10\* 4211.01\* 4212.01\* 4213.04\* 4214.00\* 4215.02\* 4216.01\* 4219.01\* 4222.03\*  
4223.01 4226.24\* 4226.25\* 4226.27\* 4226.30\* 4226.34\* 4226.38\* 5228.02 5231.02\* 6154.00\* 6185.00\*  
9412.00\*

**Median Family Income 70-80%**

0405.06\* 0405.28\* 0405.31\* 0506.15\* 0507.01\* 0608.02\* 0609.01\* 0609.03\* 0610.26\* 0610.35\* 0610.46\*  
0613.00\* 0715.05\* 0715.06\* 0715.16\* 0717.01\* 0719.09\* 0719.14\* 0820.09\* 0820.17\* 0820.22\* 0820.24\*  
0820.28\* 0822.08\* 0822.09\* 0923.08\* 0923.12\* 0927.08\* 0927.15\* 0927.16\* 0927.19\* 0927.24\* 0930.02\*  
0931.06\* 1033.03 1037.01\* 1040.00\* 1042.18\* 1042.27\* 1043.01\* 1046.00\* 1056.01\* 1057.01\* 1057.02\*  
1059.00\* 1068.02\* 1069.00\* 1070.02\* 1071.01\* 1074.02\* 1086.02\* 1091.02\* 1093.00\* 1100.02\* 1105.01\*  
1108.01 1109.01 1112.04\* 1113.00\* 1114.01\* 1114.02\* 1115.01\* 1125.12 1125.14\* 1125.15\* 1132.04\*  
1157.00\* 1163.00\* 1166.14\* 1167.17\* 1167.18\* 1167.36\* 3184.00\* 3189.00 3197.06\* 3199.08\* 3200.07\*  
4202.02\* 4202.06 4202.13\* 4204.01\* 4211.02\* 4221.05\* 4222.18\* 4225.01\* 4226.10\* 4226.18\* 4226.26\*  
5230.02\* 5230.07\* 6153.00\* 6155.00\* 6165.00\* 6174.00\* 6184.00\* 6190.00\* 6193.00\* 6195.00\* 8120.00\*  
8138.00\*

**Median Family Income 80-90%**

0405.12\* 0405.15\* 0405.26\* 0405.30\* 0506.03\* 0506.09\* 0506.21 0610.14\* 0610.29\* 0610.42\* 0610.43\*  
0610.51\* 0610.58\* 0715.04\* 0820.10\* 0820.12\* 0820.18\* 0820.26\* 0820.27\* 0822.04\* 0822.07\* 0822.10\*  
0923.07\* 0927.13\* 0927.23\* 1033.02\* 1036.04\* 1042.02\* 1042.03\* 1042.07 1042.12\* 1042.19 1042.21\*  
1044.02 1047.01\* 1058.00 1085.01\* 1090.03\* 1095.00\* 1097.05\* 1104.00\* 1105.02 1112.01\* 1162.02\*  
1162.03 1164.00\* 1166.06\* 1166.07\* 2168.26 2168.30 2175.01\* 3197.08\* 3198.02\* 4201.04\* 4201.11\*  
4201.14\* 4209.01\* 4212.02\* 4222.19\* 4222.23\* 4223.02\* 4225.14\* 4226.07\* 4226.09\* 4226.29\* 4226.36\*  
4226.39\* 4226.52\* 4226.53\* 4226.59\* 5229.04\* 5230.06\* 5231.04\* 6107.00\* 6146.02\* 6148.00\* 6156.00\*  
6170.02\* 6182.00\* 6187.00\* 6189.00\* 6194.00\* 6196.02\* 7233.04\* 8163.01\* 8171.03\*

**Median Family Income 90-100%**

0405.07\* 0405.14\* 0405.22\* 0405.24\* 0405.25\* 0405.27\* 0405.29\* 0405.39\* 0506.04\* 0506.11\* 0506.16\*  
0506.17\* 0610.28\* 0610.38\* 0610.40\* 0610.41\* 0610.57\* 0610.60\* 0610.61\* 0715.03\* 0715.12\* 0715.17\*  
0719.03\* 0719.06\* 0719.11\* 0820.02\* 0820.25\* 0822.05\* 0923.06\* 0925.00\* 0927.11\* 0927.12\* 0927.20  
1037.02\* 1042.04\* 1042.14 1042.15\* 1042.16\* 1042.22\* 1042.24\* 1065.02\* 1070.01\* 1107.02\* 1108.02\*  
1124.02\* 1125.10 1131.00\* 1137.02\* 1158.02\* 1166.16\* 1166.20\* 1167.03\* 1167.09\* 1167.11\* 2168.57\*

**2022 Institution Disclosure Statement - Table 6**

PAGE: 3 OF 5

**Assessment Area(s) by Tract****Respondent ID: 0000060143****\* denotes no loans made in specified tracts****Agency: FRS - 2****Institution: COMERICA BANK**

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2176.00*	3194.02*	3194.03*	3198.01*	3200.01*	4202.09*	4202.10*	4205.04*	4207.04*	4209.02*	4218.01*
4222.10*	4222.15*	4223.04*	4224.01	4225.02*	4225.03*	4226.15*	4226.32*	4226.40*	4226.55*	5230.08*
6135.00*	6144.00*	6145.00*	6166.00*	6168.00*	6175.00*	6177.00*	6186.00	6197.00*	8140.00*	8146.00*
8148.02*	8174.00*	8175.00*								

**Median Family Income 100-110%**

0405.13*	0405.16*	0405.23*	0405.38*	0405.40*	0506.13*	0506.14*	0610.13*	0610.24*	0610.27*	0610.33*
0610.34	0610.49*	0610.52*	0610.53*	0610.62*	0715.14*	0820.16	0820.20*	0820.23	0822.06*	0822.12*
0822.13*	0927.10*	1032.08*	1032.10	1036.08*	1036.12*	1042.17*	1042.25*	1042.26*	1052.00*	1106.00
1117.00*	1125.17*	1125.18*	1166.05*	1166.17*	1166.18*	1167.08*	1167.20*	1167.32*	1167.34*	1167.38*
1171.00*	2168.10*	2168.33*	2168.50*	2168.52*	2170.02*	2175.02*	2182.00*	3194.01*	3196.00*	4201.12*
4202.12*	4205.05*	4222.09*	4222.17*	4222.21*	4223.07	4224.02*	4225.09*	4225.13*	4226.50*	4226.60*
5229.01*	5231.03	6100.01*	6134.00*	6146.01*	6161.00*	6167.00*	6176.00	8107.00*	8111.00*	8112.00
8137.00*										

**Median Family Income 110-120%**

0405.02*	0405.32*	0506.12*	0610.15*	0610.18*	0610.31*	0610.32*	0610.44*	0610.50*	0715.11	0719.15*
0923.09*	0927.09*	1032.05*	1035.01*	1035.02	1036.06	1064.00*	1067.02*	1076.01*	1085.02*	1166.12*
1166.21*	2171.01*	2172.03*	2177.00*	2178.00*	2181.00*	3194.04*	3197.10	3199.05*	3201.00*	4202.08*
4202.15*	4202.16*	4203.03*	4208.00*	4222.11*	4222.13*	4222.27*	4224.03*	4225.08*	4226.22*	4226.37*
6157.00*	6160.00*	6162.00*	6169.00*	6179.00	6180.00*	6181.00*	6183.00*	6198.00*	7233.09*	8121.00*
8143.00*	8164.01*	8171.02*	8173.00*							

**Median Family Income >= 120%**

0101.02*	0101.03*	0101.04*	0304.01*	0304.02*	0405.33*	0405.34*	0405.35*	0405.36*	0405.37*	0506.18*
0506.19*	0506.20*	0610.10*	0610.11*	0610.20*	0610.21*	0610.36*	0610.37*	0610.39*	0610.45*	0610.47*
0610.48*	0610.54*	0610.55*	0610.56	0610.59*	0610.64*	0715.09*	0715.10*	0715.13*	0715.15*	0820.19*
0820.21*	0822.11*	0927.21*	1032.06*	1032.07*	1032.09	1032.11*	1032.12*	1032.14*	1032.15*	1032.16*
1032.17*	1032.19*	1032.20*	1034.00*	1036.05*	1036.07*	1036.11*	1036.14*	1042.23*	1048.01*	1048.02*
1049.00*	1050.02*	1050.03*	1050.04*	1051.01*	1051.02*	1051.03*	1053.00*	1054.00*	1061.00*	1062.00*
1063.00*	1065.01*	1066.00*	1067.03*	1074.01*	1075.00*	1076.02*	1077.00	1078.00	1079.00*	1080.00*
1081.00*	1082.00	1083.01*	1083.02*	1084.00*	1089.01*	1110.00	1111.00*	1118.00*	1119.00*	1130.00*

**2022 Institution Disclosure Statement - Table 6**

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**Assessment Area(s) by Tract****Respondent ID: 0000060143****\* denotes no loans made in specified tracts****Agency: FRS - 2****Institution: COMERICA BANK**

1141.00	1166.10*	1166.11*	1166.19*	1167.07*	1167.10*	1167.12*	1167.13*	1167.14*	1167.15*	1167.19*
1167.21*	1167.25*	1167.27*	1167.28*	1167.29*	1167.30*	1167.31*	1167.37*	2168.06*	2168.07*	2168.09*
2168.13*	2168.16	2168.19*	2168.20*	2168.21*	2168.22*	2168.29*	2168.31*	2168.32*	2168.34	2168.35*
2168.36*	2168.37*	2168.38*	2168.39*	2168.40*	2168.41	2168.42*	2168.43*	2168.44*	2168.49*	2168.51*
2168.53*	2168.54*	2168.55*	2168.56*	2168.59*	2168.60	2168.61*	2169.01*	2169.02*	2170.01*	2171.02*
2172.01*	2173.00*	2174.00*	2179.00*	2180.00*	3187.00*	3190.02*	3195.00*	3199.02*	3199.03*	3199.04*
3199.06*	3199.07*	3199.09*	3199.10	4201.05*	4201.07*	4201.08*	4201.09*	4201.10*	4202.07*	4202.11*
4203.01*	4203.02*	4203.04	4204.02*	4206.02*	4206.03*	4206.04*	4207.05*	4207.06*	4222.12*	4222.16*
4222.20*	4222.22*	4223.05*	4223.08	4223.09*	4224.04*	4225.04	4225.06	4225.07*	4225.10*	4225.11*
4225.12*	4226.17*	4226.20*	4226.21*	4226.23*	4226.42*	4226.43*	4226.47*	4226.48*	4226.49*	4226.51*
4226.54*	4226.56*	4226.57*	4226.58*	5230.05*	6100.02	6101.00*	6102.01*	6102.02*	6103.01*	6103.02*
6104.00*	6105.00*	6106.00*	6108.00*	6109.01*	6109.02*	6109.03*	6110.00*	6111.00*	6112.00*	6113.00*
6114.00*	6115.00	6116.00*	6117.00*	6118.00*	6119.00*	6120.00*	6122.00*	6123.01	6123.02*	6124.01*
6124.02*	6125.00*	6126.00*	6127.00*	6128.00*	6129.00*	6130.00*	6131.00*	6132.00*	6133.00*	6136.01*
6136.02*	6137.00*	6138.00*	6139.00*	6140.00*	6141.00*	6142.00*	6143.00*	6149.00	6150.01*	6150.02
6151.00*	6152.01*	6152.02*	6158.00*	6159.00*	6163.00*	6164.00*	6171.00*	6172.00*	6173.00*	6178.00*
6199.00*	7233.07*	7233.10*	7233.11*	8100.00*	8101.00*	8102.00*	8103.00*	8104.00	8105.00*	8106.00*
8108.00*	8109.00*	8110.00*	8113.00*	8114.00*	8115.00*	8116.00*	8117.00*	8118.00*	8119.00*	8122.00*
8123.00*	8124.00	8125.00*	8126.00	8127.00*	8128.01*	8128.02*	8129.00*	8130.00	8131.00*	8132.00*
8133.00*	8134.00*	8135.00*	8136.00*	8139.00*	8141.00*	8142.00*	8144.00*	8145.00*	8147.00*	8148.01*
8149.00*	8150.00	8151.00*	8152.01	8152.02*	8152.03*	8153.00*	8154.01*	8154.02*	8155.01*	8155.02*
8156.01*	8156.02*	8157.00*	8158.00*	8159.01*	8159.02*	8160.01*	8160.02*	8160.03*	8160.04*	8160.05*
8161.00*	8162.00*	8163.02*	8164.02*	8165.01*	8165.02*	8166.00*	8167.00*	8168.00*	8169.01*	8169.02*
8169.03*	8169.04*	8170.00*	8171.01*	8172.00*	8176.00*	9809.00*				

**Median Family Income Not Known**

0608.01*	0610.17*	0610.63*	1074.04*	1147.05*	1167.33*	2168.58*	3190.01*	3192.02*	3197.07*	3197.09
4222.24*	4222.25*	4222.26*	5228.01	6170.01*	6196.01*	7233.06*	9411.00*	9801.00*	9804.00*	9805.00*
9807.00*	9810.00*									

**OUTSIDE ASSESSMENT AREA**

**2022 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

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

**Institution: COMERICA BANK**

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**APACHE COUNTY (001), AZ**

**MSA: NA**

**Upper Income**

9705.02

**PINAL COUNTY (021), AZ**

**MSA: 38060**

**Moderate Income**

0002.17

**YUMA COUNTY (027), AZ**

**MSA: 49740**

**Moderate Income**

0109.13

**Respondent ID: 0000060143**

**Agency: FRS - 2**

2022 Institution Disclosure Statement - Table E-1

Error Status Information

Respondent ID: 0000060143

Institution: COMERICA BANK

Agency: FRS - 2

Record Identifier: <sup>11</sup>	Total Composite Records on File	Total Composite Records Without Errors	Total Validity <sup>10</sup> 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

## Small Business Loans - Originations

Institution: COMERICA BANK

Respondent ID: 0000060143

Agency: FRS - 2

State: ARIZONA (04)

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)
<b>APACHE COUNTY (001), AZ</b>										
<b>MSA NA</b>										
<b>Outside Assessment Area</b>										
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	1,000	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
<b>MARICOPA COUNTY (013), AZ</b>										
<b>MSA 38060</b>										
<b>Inside AA 0019</b>										
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%	3	300	2	500	1	320	1	100	0	0
Median Family Income 50-60%	9	540	3	485	3	1,430	5	270	0	0
Median Family Income 60-70%	6	475	1	245	1	450	5	570	0	0
Median Family Income 70-80%	8	515	0	0	2	683	5	370	0	0
Median Family Income 80-90%	5	191	2	355	1	750	5	191	0	0
Median Family Income 90-100%	5	299	1	150	3	1,750	3	279	0	0
Median Family Income 100-110%	6	390	2	465	3	2,300	5	465	0	0
Median Family Income 110-120%	2	175	3	500	1	310	1	100	0	0
Median Family Income ≥ 120%	19	1,395	11	1,934	12	5,565	19	3,341	0	0
Median Family Income Not Known	0	0	1	150	1	300	1	150	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	63	4,280	26	4,784	28	13,858	50	5,836	0	0

## Loans by County

## Small Business Loans - Originations

Institution: COMERICA BANK

Respondent ID: 0000060143

Agency: FRS - 2

State: ARIZONA (04)

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)
<b>PINAL COUNTY (021), AZ</b>										
<b>MSA 38060</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	1	150	0	0	1	150	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	1	150	0	0	1	150	0	0
<b>YAVAPAI COUNTY (025), AZ</b>										
<b>MSA 39150</b>										
<b>Outside Assessment Area</b>										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	1	947	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	947	0	0	0	0
TOTAL INSIDE AA IN STATE	63	4,280	26	4,784	28	13,858	50	5,836	0	0
TOTAL OUTSIDE AA IN STATE	0	0	1	150	2	1,947	1	150	0	0
STATE TOTAL	63	4,280	27	4,934	30	15,805	51	5,986	0	0

## Loans by County

## Small Business Loans - Purchases

Institution: COMERICA BANK

Respondent ID: 0000060143

Agency: FRS - 2

State: ARIZONA (04)

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)
<b>MARICOPA COUNTY (013), AZ</b>										
<b>MSA 38060</b>										
<b>Inside AA 0019</b>										
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	10	0	0	0	0	1	10	0	0
Median Family Income 40-50%	1	7	0	0	0	0	1	7	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	10	0	0	0	0	1	10	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	10	0	0	0	0	1	10	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	37	0	0	0	0	4	37	0	0
TOTAL INSIDE AA IN STATE	4	37	0	0	0	0	4	37	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
STATE TOTAL	4	37	0	0	0	0	4	37	0	0

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

PAGE: 1 OF 3

**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**

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**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: 0000060143**  
**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**

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**Assessment Area(s) by Tract****Respondent ID: 0000060143****\* denotes no loans made in specified tracts****Agency: FRS - 2****Institution: COMERICA BANK**

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**ASSESSMENT AREA - 0019****MARICOPA COUNTY (013), AZ****MSA: 38060****Median Family Income 20-30%**

1074.03\* 1133.01\* 1139.00\* 1173.00\*

**Median Family Income 30-40%**

0928.01\* 1060.02\* 1068.01 1072.01\* 1090.01\* 1090.02\* 1092.00\* 1126.01\* 1132.02\* 1142.00\* 1143.02\*

1149.00\* 1153.00\* 4219.02\* 4221.02\*

**Median Family Income 40-50%**

0614.01\* 0926.00\* 0927.18\* 0928.02\* 0929.00 0930.01\* 0931.04\* 0931.05\* 1033.06\* 1036.15\* 1043.02\*

1045.02\* 1055.01\* 1055.02\* 1056.02\* 1067.01\* 1073.00\* 1094.01\* 1097.07\* 1098.01\* 1112.02 1125.07\*

1129.00\* 1132.01\* 1135.02\* 1144.01\* 1146.00\* 1147.04 1148.00\* 1154.00 1158.01\* 1165.00\* 1168.00

3191.03\* 3192.01\* 4210.02\* 4213.02\* 4216.02\* 4217.02\* 4221.07\* 4226.28\* 5229.03\* 6188.00\* 9410.00\*

9413.00\*

**Median Family Income 50-60%**

0405.41\* 0609.02\* 0612.00\* 0716.00 0718.01\* 0718.02\* 0719.12\* 0820.08\* 0923.11\* 0924.02\* 0927.17\*

1033.04\* 1033.05\* 1036.09\* 1042.05\* 1045.01\* 1047.02\* 1055.03\* 1060.01\* 1071.02 1096.01\* 1096.02\*

1097.02\* 1097.03\* 1097.04\* 1097.06\* 1101.00\* 1107.01\* 1109.02 1112.03\* 1115.02\* 1121.00\* 1123.01\*

1123.02\* 1124.01\* 1125.19\* 1125.21\* 1125.22\* 1125.23\* 1125.24\* 1126.02\* 1127.00\* 1135.03\* 1136.01\*

1136.02\* 1137.01\* 1138.00 1140.00 1143.01\* 1145.00\* 1155.00\* 1161.00\* 1162.04\* 1166.15\* 1167.35\*

1169.00 1170.00\* 1172.00\* 2168.45 3185.01\* 3191.01\* 3191.04\* 4201.13\* 4205.03\* 4207.08 4210.01\*

4213.03\* 4215.01\* 4217.01\* 4218.02\* 4220.01\* 4220.02\* 4221.03\* 4221.04\* 4221.06\* 4226.33 6147.00

6191.00\* 6192.00\* 7233.05\* 9407.00\*

**Median Family Income 60-70%**

0507.02\* 0609.04\* 0611.00\* 0614.02\* 0717.02 0719.10\* 0719.13\* 0820.07\* 0830.00 0923.05\* 0924.01\*

0927.05 0931.01\* 0932.00\* 1039.00\* 1041.00\* 1042.06\* 1044.01\* 1060.03\* 1072.02\* 1086.01\* 1088.02\*

1089.02\* 1091.01\* 1094.02\* 1096.03\* 1096.04\* 1098.02\* 1099.00\* 1100.01\* 1116.01\* 1116.02\* 1122.01\*

1122.02\* 1125.02\* 1125.04\* 1125.08\* 1125.16\* 1125.20\* 1144.02\* 1152.00\* 1156.00\* 1159.00\* 1160.00\*

1162.05\* 2172.04\* 2183.00\* 3188.00\* 3193.00\* 3197.05\* 3200.02\* 4201.15\* 4201.16\* 4202.14\* 4205.06\*

**2023 Institution Disclosure Statement - Table 6**

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**Assessment Area(s) by Tract****Respondent ID: 0000060143****\* denotes no loans made in specified tracts****Agency: FRS - 2****Institution: COMERICA BANK**

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4207.07	4207.09*	4207.10*	4211.01*	4212.01*	4213.04*	4214.00*	4215.02*	4216.01	4219.01*	4222.03*
4223.01	4226.24*	4226.25*	4226.27*	4226.30*	4226.34*	4226.38*	5228.02	5231.02*	6154.00*	6185.00*
9412.00*										

**Median Family Income 70-80%**

0405.06*	0405.28*	0405.31*	0506.15*	0507.01*	0608.02*	0609.01*	0609.03*	0610.26*	0610.35*	0610.46*
0613.00*	0715.05*	0715.06*	0715.16*	0717.01*	0719.09*	0719.14*	0820.09*	0820.17*	0820.22*	0820.24*
0820.28*	0822.08*	0822.09*	0923.08*	0923.12*	0927.08*	0927.15*	0927.16*	0927.19*	0927.24*	0930.02*
0931.06*	1033.03	1037.01*	1040.00*	1042.18*	1042.27*	1043.01*	1046.00*	1056.01*	1057.01*	1057.02*
1059.00*	1068.02*	1069.00*	1070.02*	1071.01*	1074.02*	1086.02*	1091.02*	1093.00*	1100.02*	1105.01
1108.01	1109.01	1112.04*	1113.00*	1114.01*	1114.02*	1115.01*	1125.12*	1125.14*	1125.15*	1132.04*
1157.00*	1163.00*	1166.14*	1167.17*	1167.18*	1167.36*	3184.00	3189.00	3197.06*	3199.08*	3200.07*
4202.02*	4202.06	4202.13*	4204.01*	4211.02*	4221.05*	4222.18*	4225.01*	4226.10*	4226.18*	4226.26*
5230.02*	5230.07*	6153.00*	6155.00*	6165.00*	6174.00*	6184.00*	6190.00*	6193.00*	6195.00*	8120.00*
8138.00*										

**Median Family Income 80-90%**

0405.12*	0405.15*	0405.26*	0405.30*	0506.03*	0506.09*	0506.21	0610.14*	0610.29*	0610.42*	0610.43*
0610.51*	0610.58*	0715.04*	0820.10*	0820.12*	0820.18*	0820.26*	0820.27*	0822.04*	0822.07*	0822.10*
0923.07*	0927.13*	0927.23*	1033.02*	1036.04*	1042.02*	1042.03*	1042.07*	1042.12*	1042.19*	1042.21*
1044.02*	1047.01*	1058.00*	1085.01*	1090.03*	1095.00*	1097.05*	1104.00*	1105.02	1112.01	1162.02*
1162.03*	1164.00*	1166.06*	1166.07*	2168.26	2168.30*	2175.01*	3197.08*	3198.02*	4201.04*	4201.11*
4201.14*	4209.01*	4212.02*	4222.19*	4222.23*	4223.02*	4225.14	4226.07*	4226.09*	4226.29*	4226.36*
4226.39*	4226.52*	4226.53*	4226.59*	5229.04*	5230.06*	5231.04*	6107.00*	6146.02*	6148.00*	6156.00*
6170.02*	6182.00*	6187.00*	6189.00*	6194.00*	6196.02*	7233.04*	8163.01*	8171.03*		

**Median Family Income 90-100%**

0405.07	0405.14*	0405.22*	0405.24*	0405.25*	0405.27*	0405.29*	0405.39*	0506.04*	0506.11	0506.16*
0506.17*	0610.28*	0610.38	0610.40*	0610.41*	0610.57*	0610.60*	0610.61*	0715.03*	0715.12*	0715.17
0719.03*	0719.06*	0719.11*	0820.02*	0820.25*	0822.05*	0923.06*	0925.00*	0927.11*	0927.12*	0927.20
1037.02*	1042.04*	1042.14*	1042.15*	1042.16*	1042.22*	1042.24*	1065.02*	1070.01*	1107.02*	1108.02*
1124.02*	1125.10	1131.00*	1137.02*	1158.02*	1166.16*	1166.20*	1167.03*	1167.09*	1167.11*	2168.57*

**2023 Institution Disclosure Statement - Table 6**

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**Assessment Area(s) by Tract****Respondent ID: 0000060143****\* denotes no loans made in specified tracts****Agency: FRS - 2****Institution: COMERICA BANK**

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2176.00*	3194.02*	3194.03*	3198.01*	3200.01*	4202.09	4202.10*	4205.04*	4207.04*	4209.02*	4218.01*
4222.10*	4222.15*	4223.04*	4224.01	4225.02*	4225.03*	4226.15*	4226.32*	4226.40*	4226.55*	5230.08*
6135.00*	6144.00*	6145.00*	6166.00*	6168.00*	6175.00*	6177.00*	6186.00	6197.00*	8140.00*	8146.00*
8148.02*	8174.00*	8175.00*								

**Median Family Income 100-110%**

0405.13*	0405.16*	0405.23*	0405.38*	0405.40*	0506.13*	0506.14*	0610.13*	0610.24*	0610.27*	0610.33*
0610.34*	0610.49*	0610.52*	0610.53*	0610.62*	0715.14*	0820.16	0820.20*	0820.23	0822.06*	0822.12*
0822.13*	0927.10*	1032.08*	1032.10	1036.08*	1036.12*	1042.17*	1042.25*	1042.26*	1052.00	1106.00
1117.00*	1125.17*	1125.18*	1166.05*	1166.17*	1166.18*	1167.08*	1167.20*	1167.32*	1167.34*	1167.38*
1171.00*	2168.10*	2168.33*	2168.50*	2168.52*	2170.02*	2175.02*	2182.00*	3194.01*	3196.00*	4201.12*
4202.12*	4205.05*	4222.09*	4222.17*	4222.21*	4223.07	4224.02*	4225.09*	4225.13	4226.50*	4226.60*
5229.01*	5231.03	6100.01*	6134.00*	6146.01*	6161.00*	6167.00*	6176.00*	8107.00*	8111.00*	8112.00
8137.00*										

**Median Family Income 110-120%**

0405.02*	0405.32*	0506.12*	0610.15*	0610.18*	0610.31*	0610.32*	0610.44*	0610.50*	0715.11*	0719.15*
0923.09*	0927.09*	1032.05*	1035.01*	1035.02*	1036.06	1064.00*	1067.02*	1076.01*	1085.02*	1166.12*
1166.21*	2171.01*	2172.03*	2177.00*	2178.00*	2181.00*	3194.04*	3197.10	3199.05*	3201.00*	4202.08*
4202.15	4202.16*	4203.03*	4208.00	4222.11*	4222.13*	4222.27*	4224.03*	4225.08*	4226.22*	4226.37*
6157.00*	6160.00*	6162.00*	6169.00*	6179.00	6180.00*	6181.00*	6183.00*	6198.00*	7233.09*	8121.00*
8143.00*	8164.01*	8171.02*	8173.00*							

**Median Family Income >= 120%**

0101.02*	0101.03*	0101.04*	0304.01*	0304.02	0405.33*	0405.34*	0405.35*	0405.36*	0405.37*	0506.18*
0506.19*	0506.20*	0610.10*	0610.11*	0610.20*	0610.21*	0610.36*	0610.37*	0610.39*	0610.45*	0610.47*
0610.48*	0610.54*	0610.55*	0610.56*	0610.59*	0610.64*	0715.09*	0715.10*	0715.13*	0715.15*	0820.19*
0820.21*	0822.11*	0927.21*	1032.06*	1032.07*	1032.09	1032.11	1032.12*	1032.14*	1032.15*	1032.16*
1032.17*	1032.19	1032.20*	1034.00*	1036.05*	1036.07*	1036.11*	1036.14*	1042.23	1048.01*	1048.02*
1049.00*	1050.02*	1050.03*	1050.04*	1051.01*	1051.02*	1051.03*	1053.00*	1054.00*	1061.00*	1062.00*
1063.00*	1065.01*	1066.00*	1067.03*	1074.01*	1075.00*	1076.02*	1077.00	1078.00*	1079.00*	1080.00*
1081.00*	1082.00	1083.01*	1083.02*	1084.00*	1089.01*	1110.00	1111.00*	1118.00*	1119.00*	1130.00*

**2023 Institution Disclosure Statement - Table 6**

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**Assessment Area(s) by Tract****Respondent ID: 0000060143****\* denotes no loans made in specified tracts****Agency: FRS - 2****Institution: COMERICA BANK**

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1141.00	1166.10*	1166.11*	1166.19*	1167.07*	1167.10*	1167.12*	1167.13*	1167.14*	1167.15*	1167.19*
1167.21*	1167.25*	1167.27*	1167.28*	1167.29*	1167.30*	1167.31*	1167.37*	2168.06*	2168.07*	2168.09*
2168.13*	2168.16	2168.19*	2168.20*	2168.21*	2168.22*	2168.29*	2168.31*	2168.32*	2168.34	2168.35*
2168.36*	2168.37*	2168.38*	2168.39*	2168.40*	2168.41	2168.42*	2168.43*	2168.44*	2168.49*	2168.51*
2168.53*	2168.54*	2168.55*	2168.56*	2168.59*	2168.60	2168.61*	2169.01*	2169.02*	2170.01*	2171.02*
2172.01	2173.00*	2174.00*	2179.00*	2180.00*	3187.00*	3190.02*	3195.00*	3199.02*	3199.03*	3199.04*
3199.06*	3199.07*	3199.09*	3199.10*	4201.05*	4201.07*	4201.08*	4201.09	4201.10*	4202.07*	4202.11*
4203.01*	4203.02*	4203.04	4204.02*	4206.02*	4206.03*	4206.04*	4207.05*	4207.06*	4222.12*	4222.16*
4222.20*	4222.22*	4223.05*	4223.08	4223.09*	4224.04*	4225.04*	4225.06*	4225.07*	4225.10*	4225.11*
4225.12*	4226.17*	4226.20*	4226.21*	4226.23*	4226.42*	4226.43*	4226.47*	4226.48*	4226.49*	4226.51*
4226.54	4226.56	4226.57*	4226.58*	5230.05*	6100.02	6101.00*	6102.01*	6102.02*	6103.01*	6103.02*
6104.00*	6105.00*	6106.00*	6108.00*	6109.01*	6109.02*	6109.03*	6110.00*	6111.00*	6112.00*	6113.00*
6114.00*	6115.00*	6116.00*	6117.00*	6118.00*	6119.00*	6120.00*	6122.00*	6123.01	6123.02*	6124.01*
6124.02*	6125.00*	6126.00*	6127.00*	6128.00*	6129.00*	6130.00*	6131.00*	6132.00*	6133.00*	6136.01*
6136.02*	6137.00*	6138.00*	6139.00*	6140.00*	6141.00*	6142.00*	6143.00*	6149.00	6150.01*	6150.02
6151.00*	6152.01*	6152.02	6158.00*	6159.00*	6163.00*	6164.00*	6171.00*	6172.00*	6173.00*	6178.00*
6199.00*	7233.07*	7233.10*	7233.11*	8100.00*	8101.00*	8102.00*	8103.00*	8104.00	8105.00*	8106.00*
8108.00	8109.00*	8110.00*	8113.00*	8114.00*	8115.00*	8116.00*	8117.00*	8118.00*	8119.00*	8122.00*
8123.00*	8124.00	8125.00*	8126.00*	8127.00*	8128.01*	8128.02*	8129.00*	8130.00	8131.00*	8132.00*
8133.00*	8134.00*	8135.00*	8136.00	8139.00*	8141.00*	8142.00*	8144.00*	8145.00*	8147.00*	8148.01*
8149.00*	8150.00	8151.00*	8152.01*	8152.02*	8152.03*	8153.00*	8154.01*	8154.02*	8155.01	8155.02*
8156.01*	8156.02*	8157.00*	8158.00*	8159.01	8159.02*	8160.01*	8160.02*	8160.03*	8160.04*	8160.05*
8161.00	8162.00*	8163.02*	8164.02*	8165.01*	8165.02*	8166.00*	8167.00*	8168.00*	8169.01*	8169.02*
8169.03	8169.04*	8170.00*	8171.01*	8172.00*	8176.00*	9809.00*				

**Median Family Income Not Known**

0608.01*	0610.17*	0610.63*	1074.04*	1147.05*	1167.33*	2168.58*	3190.01*	3192.02*	3197.07*	3197.09
4222.24*	4222.25*	4222.26*	5228.01	6170.01*	6196.01*	7233.06*	9411.00*	9801.00*	9804.00*	9805.00*
9807.00*	9810.00*									

**OUTSIDE ASSESSMENT AREA**

**2023 Institution Disclosure Statement - Table 6**

**Assessment Area(s) by Tract**

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

**Institution: COMERICA BANK**

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**APACHE COUNTY (001), AZ**

**MSA: NA**

**Upper Income**

9705.02

**PINAL COUNTY (021), AZ**

**MSA: 38060**

**Moderate Income**

0002.17

**YAVAPAI COUNTY (025), AZ**

**MSA: 39150**

**Moderate Income**

0016.01

**Respondent ID: 0000060143**

**Agency: FRS - 2**

2023 Institution Disclosure Statement - Table E-1

Error Status Information

Respondent ID: 0000060143

Institution: COMERICA BANK

Agency: FRS - 2

Record Identifier: <sup>11</sup>	Total Composite Records on File	Total Composite Records Without Errors	Total Validity <sup>10</sup> 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.