This report presents consolidated financial statistics for the U.S. commercial banking industry, including both bank holding companies (BHCs) and banks. Statistics are based on quarterly regulatory filings. \(^1\) Statistics are inclusive of BHCs’ nonbank subsidiaries. Separate statistics are reported on a merger-adjusted basis for the subset of BHCs with >$500bn in total assets as of 2014:Q3\(^2\), for BHCs with $50bn-500bn in total assets, and for the remainder of the industry.

**Highlights**

- Industry capitalization, measured as the sum of common equity tier 1 (CET1) plus tier 1 common equity as a percentage of risk-weighted assets (RWA), rose slightly to 12.48% in 2014:Q3, from 12.44% in 2014:Q2. The leverage ratio, defined as the ratio of the sum of tier 1 capital plus tier 1 risk-based capital to average assets, rose to 9.10%, from 9.06% in Q2.

  [Note: Starting in 2014:Q1, BHCs using advanced approaches under the Basel II/III framework began reporting CET1 rather than the components used to calculate tier 1 common equity and tier 1 capital instead of tier 1 risk-based capital.]

- Annualized return on assets for the industry decreased slightly to 0.86%, from 0.87% in 2014:Q2. Return on equity also declined to 7.9%, from 8.0% in Q2.

- Non-performing loans as a percentage of total loans decreased to 2.1% in 2014:Q3, from 2.3% in the prior quarter. This ratio has now declined for 19 consecutive quarters. Net chargeoffs also declined slightly as a percentage of total loans. The current annualized net chargeoff ratio of 0.51% is less than half of its 1991-2014 historical average, and less than one-sixth of its historical peak in 2009:Q4.

- Four-quarter-ended loan growth and asset growth were both positive for the industry, at 4.6% and 3.2% respectively.

\(^1\) Industry statistics are calculated by summing consolidated financial data across all reporting U.S. parent BHCs (from the FR Y-9C report), plus values for “standalone” banks not controlled by a BHC, or whose parent BHC does not report on a consolidated basis (from the FFIEC 031/041 reports). The data do not include savings bank holding companies, branches and agencies of foreign banks, or nonbanks that are not held by a U.S. BHC.

\(^2\) Six BHCs exceed this $500bn size threshold: J.P. Morgan Chase, Bank of America, Citigroup, Wells Fargo, Goldman Sachs, and Morgan Stanley.
# Table of Contents

Charts and Tables

1. Composition of banking industry assets and liabilities
   - Balance sheet composition 3
   - Balance sheet percentages 3
   - Fed funds sold and purchased ratio 4
   - Repurchase agreements 4
   - Securities and Trading Assets/Liabilities 5
   - Available-for-Sale Securities 5
   - Held-to-Maturity Securities 6
   - Securities Portfolios 6

2. Earnings and pre-provision net revenue
   - Return on assets 7
   - Return on equity 7
   - Net interest margin 8
   - Noninterest income share 8
   - Return on trading assets 9
   - Non-trading non-interest income ratio 9
   - Efficiency ratio 10

3. Asset quality
   - Non-performing loans 11
   - Non-performing real estate loans 11
   - Non-performing residential real estate loans 12
   - Non-performing commercial real estate loans 12
   - Non-performing commercial and industrial loans 13
   - Non-performing consumer loans 13
   - Net charge-offs 14
   - Loan loss provisions 14
   - Loan loss reserves 15

4. Capital adequacy and asset growth
   - Tier 1 common equity ratio 16
   - Tier 1 capital ratio 16
   - Total capital ratio 17
   - Leverage ratio 17
   - Asset growth rates 18
   - Loan growth rates 18
   - Domestic deposit growth rates 19
   - Risk-weighted assets 19

5. Consolidated financial statistics for the Fifty Largest BHCs 20

Notes and caveats
   - Methodology 21
   - Caveats and limitations 22
   - Data notes 23
1. Composition of Banking Industry Assets and Liabilities

Balance Sheet Composition

Balance Sheet Percentages
Note: These charts begin in 2002:Q1 because data for repurchase agreements and federal funds are not consistently reported separately prior to that date.
Trading Assets and Liabilities

% of Total Assets

Note: The subcomponents of trading assets and liabilities in the above chart only represent banks and BHCs that reported average trading assets of $2 million or more in any of the four preceding quarters.

Available-for-Sale Securities

% of Total Assets
Note: Chart measures debt and equity securities portfolios. Thus, trading portfolio excludes other types of trading assets such as whole loans and derivatives.
2. Earnings and Pre-Provision Net Revenue

Return on Assets

Annualized net income as % of total assets

Return on Equity

Annualized net income as % of equity
Note: Net operating revenue is defined as net interest income plus noninterest income.
Efficiency Ratio

Noninterest expense as % of net operating revenue

Note: Net operating revenue is defined as net interest income plus noninterest income.
3. Asset Quality

Note: Non-performing loans include loans that are (1) 90 days or more past due and still accruing or (2) non-accrual.

Non-performing Loans

Total non-performing loans as % of total loans

Non-performing Real Estate Loans

Non-performing real estate loans as % of real estate loans
Loan Loss Reserves

Loan loss reserves as % of non-performing loans

- **All Institutions**
- **BHCs > $500bn**
- **BHCs $50bn-500bn**
- **Banks and BHCs <$50bn**


Values range from 50 to 225.
4. Capital Adequacy and Asset Growth

Notes: CET1 is reported by advanced approaches firms beginning in 2014:Q1. Changes in the measurement of RWA in 2013:Q1 and capitalization for advanced approaches firms in 2014:Q1 affect the measurement of capital ratios starting in those quarters. See “Caveats and Limitations” for details. See data notes for definition of tier 1 common equity and CET1.

Tier 1 Common Equity and CET1 Ratio

Tier 1 risk-based capital as % of risk-weighted assets

Tier 1 Capital Ratio
Note: Asset, loan and deposit growth rates presented below are affected by mergers with nonbanking firms, and conversions to and from a BHC charter during the sample period. This particularly affects the year-over-year growth rate for assets between 2009:Q1 and 2009:Q4, due to the entry of several new firms in 2009:Q1. See “Caveats and Limitations” for details.

### Asset Growth Rates

![Asset Growth Rates Graph]

### Loan Growth Rates

![Loan Growth Rates Graph]
Note: This chart starts in 1996:Q1 because data for the risk-weighted assets component of this ratio are not reported prior to that date.
### 5. Consolidated Financial Statistics for the Fifty Largest BHCs

<table>
<thead>
<tr>
<th>Rank</th>
<th>Name of Institution</th>
<th>Total Assets (Bil USD)</th>
<th>Quarterly Net Income (Mil USD)</th>
<th>Annualized Return on Assets</th>
<th>Annualized Return on Equity</th>
<th>Tier 1 Common or CET1 Ratio</th>
<th>Tier 1 Capital Ratio</th>
<th>Total Capital Ratio</th>
<th>Advanced Approaches Firm</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>JPMORGAN CHASE &amp; CO</td>
<td>2,527.0</td>
<td>5,572.0</td>
<td>0.88</td>
<td>9.64</td>
<td>11.13</td>
<td>12.59</td>
<td>14.96</td>
<td>Yes</td>
</tr>
<tr>
<td>2</td>
<td>BANK OF AMER CORP</td>
<td>2,126.1</td>
<td>-232.0</td>
<td>-0.04</td>
<td>-0.39</td>
<td>11.99</td>
<td>12.82</td>
<td>15.79</td>
<td>Yes</td>
</tr>
<tr>
<td>3</td>
<td>CITIGROUP</td>
<td>1,882.8</td>
<td>2,839.0</td>
<td>0.83</td>
<td>9.29</td>
<td>15.08</td>
<td>15.08</td>
<td>17.37</td>
<td>Yes</td>
</tr>
<tr>
<td>4</td>
<td>WELLS FARGO &amp; CO</td>
<td>1,636.9</td>
<td>5,729.0</td>
<td>1.40</td>
<td>12.56</td>
<td>11.11</td>
<td>12.55</td>
<td>15.58</td>
<td>Yes</td>
</tr>
<tr>
<td>5</td>
<td>GOLDMAN SACHS GROUP THE</td>
<td>869.0</td>
<td>2,241.0</td>
<td>0.15</td>
<td>10.90</td>
<td>14.87</td>
<td>16.72</td>
<td>19.52</td>
<td>Yes</td>
</tr>
<tr>
<td>6</td>
<td>MORGAN STANLEY</td>
<td>814.5</td>
<td>1,693.0</td>
<td>0.60</td>
<td>5.35</td>
<td>9.69</td>
<td>11.34</td>
<td>13.63</td>
<td>Yes</td>
</tr>
<tr>
<td>7</td>
<td>U S BC</td>
<td>391.3</td>
<td>576.1</td>
<td>1.23</td>
<td>10.40</td>
<td>11.09</td>
<td>12.80</td>
<td>16.12</td>
<td>Yes</td>
</tr>
<tr>
<td>8</td>
<td>BANK OF NY MELLON CORP</td>
<td>386.3</td>
<td>1,083.0</td>
<td>0.72</td>
<td>9.27</td>
<td>8.29</td>
<td>8.49</td>
<td>10.83</td>
<td>Yes</td>
</tr>
<tr>
<td>9</td>
<td>PNC FNCL SVC GROUP</td>
<td>334.6</td>
<td>1,035.3</td>
<td>1.24</td>
<td>9.31</td>
<td>11.09</td>
<td>12.65</td>
<td>15.15</td>
<td>No</td>
</tr>
<tr>
<td>10</td>
<td>CAPITAL ONE FC</td>
<td>153.9</td>
<td>1,477.0</td>
<td>1.13</td>
<td>11.14</td>
<td>9.69</td>
<td>12.65</td>
<td>14.37</td>
<td>No</td>
</tr>
<tr>
<td>11</td>
<td>HSBC NORTH AMER HOLD</td>
<td>149.2</td>
<td>423.0</td>
<td>1.01</td>
<td>8.84</td>
<td>9.64</td>
<td>10.83</td>
<td>14.34</td>
<td>No</td>
</tr>
<tr>
<td>12</td>
<td>STATE STREET CORP</td>
<td>134.2</td>
<td>340.4</td>
<td>0.82</td>
<td>10.59</td>
<td>11.52</td>
<td>12.59</td>
<td>15.50</td>
<td>No</td>
</tr>
<tr>
<td>13</td>
<td>TD BK US HC</td>
<td>113.5</td>
<td>204.7</td>
<td>1.11</td>
<td>9.27</td>
<td>8.29</td>
<td>8.49</td>
<td>10.83</td>
<td>Yes</td>
</tr>
<tr>
<td>14</td>
<td>BB&amp;T CORP</td>
<td>111.2</td>
<td>165.4</td>
<td>0.97</td>
<td>9.07</td>
<td>10.79</td>
<td>12.01</td>
<td>14.10</td>
<td>No</td>
</tr>
<tr>
<td>15</td>
<td>SUNTRUST BK</td>
<td>89.9</td>
<td>186.3</td>
<td>0.79</td>
<td>7.11</td>
<td>11.26</td>
<td>12.01</td>
<td>14.10</td>
<td>No</td>
</tr>
<tr>
<td>16</td>
<td>AMERICAN EXPRESS CO</td>
<td>79.2</td>
<td>142.8</td>
<td>0.72</td>
<td>4.80</td>
<td>11.04</td>
<td>11.25</td>
<td>13.30</td>
<td>No</td>
</tr>
<tr>
<td>17</td>
<td>ALLY FNCL</td>
<td>68.9</td>
<td>153.7</td>
<td>0.89</td>
<td>8.27</td>
<td>10.59</td>
<td>10.59</td>
<td>12.83</td>
<td>No</td>
</tr>
<tr>
<td>18</td>
<td>FIFTH THIRD BC</td>
<td>64.3</td>
<td>155.0</td>
<td>0.95</td>
<td>9.87</td>
<td>10.31</td>
<td>11.61</td>
<td>13.72</td>
<td>No</td>
</tr>
<tr>
<td>19</td>
<td>CITIZENS FNCL GRP</td>
<td>60.6</td>
<td>155.0</td>
<td>0.95</td>
<td>9.87</td>
<td>10.31</td>
<td>11.61</td>
<td>13.72</td>
<td>No</td>
</tr>
<tr>
<td>20</td>
<td>BMO FNCL CORP</td>
<td>55.5</td>
<td>95.9</td>
<td>0.69</td>
<td>5.24</td>
<td>11.86</td>
<td>14.43</td>
<td>16.28</td>
<td>No</td>
</tr>
<tr>
<td>21</td>
<td>REGIONS FC</td>
<td>48.7</td>
<td>120.3</td>
<td>0.99</td>
<td>8.33</td>
<td>10.96</td>
<td>12.10</td>
<td>12.71</td>
<td>No</td>
</tr>
<tr>
<td>22</td>
<td>SANTANDER HOLDS USA</td>
<td>46.5</td>
<td>120.3</td>
<td>0.99</td>
<td>8.33</td>
<td>10.96</td>
<td>12.10</td>
<td>12.71</td>
<td>No</td>
</tr>
<tr>
<td>23</td>
<td>NORTHERN TR CORP</td>
<td>38.0</td>
<td>92.3</td>
<td>0.92</td>
<td>6.08</td>
<td>10.60</td>
<td>11.19</td>
<td>13.17</td>
<td>No</td>
</tr>
<tr>
<td>24</td>
<td>MUFG AMERS HOLDS CORP</td>
<td>37.2</td>
<td>153.7</td>
<td>0.92</td>
<td>6.08</td>
<td>10.60</td>
<td>11.19</td>
<td>13.17</td>
<td>No</td>
</tr>
<tr>
<td>25</td>
<td>M&amp;T BK CORP</td>
<td>34.1</td>
<td>63.0</td>
<td>0.70</td>
<td>5.86</td>
<td>14.74</td>
<td>16.86</td>
<td>18.14</td>
<td>No</td>
</tr>
<tr>
<td>26</td>
<td>DISCOVER FS</td>
<td>32.0</td>
<td>68.7</td>
<td>0.86</td>
<td>9.47</td>
<td>8.72</td>
<td>9.92</td>
<td>12.14</td>
<td>No</td>
</tr>
<tr>
<td>27</td>
<td>BBVA COMPASS BSHRS</td>
<td>29.1</td>
<td>75.6</td>
<td>0.74</td>
<td>14.37</td>
<td>13.72</td>
<td>13.72</td>
<td>15.11</td>
<td>No</td>
</tr>
<tr>
<td>28</td>
<td>COMMERICA</td>
<td>28.5</td>
<td>88.8</td>
<td>1.25</td>
<td>12.83</td>
<td>10.53</td>
<td>10.87</td>
<td>12.45</td>
<td>No</td>
</tr>
<tr>
<td>29</td>
<td>CULLEN/FROST BKR</td>
<td>27.4</td>
<td>77.6</td>
<td>1.13</td>
<td>11.02</td>
<td>12.10</td>
<td>13.90</td>
<td>14.81</td>
<td>No</td>
</tr>
<tr>
<td>30</td>
<td>SYNOVUS FC</td>
<td>26.5</td>
<td>46.8</td>
<td>0.71</td>
<td>6.08</td>
<td>10.60</td>
<td>11.19</td>
<td>13.17</td>
<td>No</td>
</tr>
<tr>
<td>31</td>
<td>ASSOCIATED BANC-CORP</td>
<td>25.7</td>
<td>50.2</td>
<td>0.78</td>
<td>7.00</td>
<td>10.39</td>
<td>10.73</td>
<td>11.98</td>
<td>No</td>
</tr>
<tr>
<td>32</td>
<td>FIRSTMERIT CORP</td>
<td>24.6</td>
<td>63.9</td>
<td>1.04</td>
<td>9.06</td>
<td>10.60</td>
<td>11.17</td>
<td>13.45</td>
<td>No</td>
</tr>
<tr>
<td>33</td>
<td>BARCLAYS DE HOLDS LLC</td>
<td>24.2</td>
<td>49.6</td>
<td>0.82</td>
<td>6.83</td>
<td>9.91</td>
<td>12.22</td>
<td>14.59</td>
<td>No</td>
</tr>
<tr>
<td>34</td>
<td>FIRST HORIZON NAT CORP</td>
<td>24.0</td>
<td>46.9</td>
<td>0.82</td>
<td>6.83</td>
<td>11.40</td>
<td>14.47</td>
<td>16.22</td>
<td>No</td>
</tr>
<tr>
<td>35</td>
<td>COMMERCE BSHRS</td>
<td>22.7</td>
<td>68.2</td>
<td>1.20</td>
<td>11.93</td>
<td>12.85</td>
<td>13.80</td>
<td>14.99</td>
<td>No</td>
</tr>
<tr>
<td>36</td>
<td>UMPQUA HC</td>
<td>22.5</td>
<td>59.0</td>
<td>1.05</td>
<td>6.29</td>
<td>11.18</td>
<td>14.10</td>
<td>14.86</td>
<td>No</td>
</tr>
<tr>
<td>**</td>
<td><strong>TOP 50</strong></td>
<td><strong>14,794.4</strong></td>
<td><strong>30,454.3</strong></td>
<td><strong>0.82</strong></td>
<td><strong>7.60</strong></td>
<td><strong>12.23</strong></td>
<td><strong>13.36</strong></td>
<td><strong>16.00</strong></td>
<td><strong>No</strong></td>
</tr>
<tr>
<td>**</td>
<td><strong>ALL INSTITUTIONS (BHCS AND BANKS)</strong></td>
<td><strong>17,791.8</strong></td>
<td><strong>38,168.8</strong></td>
<td><strong>0.86</strong></td>
<td><strong>7.87</strong></td>
<td><strong>12.48</strong></td>
<td><strong>13.60</strong></td>
<td><strong>15.99</strong></td>
<td><strong>No</strong></td>
</tr>
</tbody>
</table>

*For the industry net income and capital adequacy ratios, we sum the numerator and denominator across individual firms and then compute ratios.
Notes and caveats

Methodology

The data used to construct the statistics in this report are drawn from the quarterly Consolidated Financial Statements for Bank Holding Companies (FR Y-9C), and Consolidated Reports of Condition and Income for commercial banks (FFIEC 031 and 041). Reported statistics are defined in a time-consistent way across reporting form vintages.

To calculate the “all institutions” quarterly series, we aggregate the data for top-tier bank holding companies (BHCs), including US BHCs and bank subsidiaries of foreign banking organizations,3 as well as commercial banks owned by BHCs that are too small to file Y-9C reports (the current reporting threshold is $500m of total assets), and unaffiliated (stand-alone) commercial banks. We identify “top-tier” BHCs (i.e. the U.S. parent entity) via the National Information Center (NIC, http://www.ffiec.gov/nicpubweb/nicweb/nichome.aspx), which provides data on firm attributes and structure. We identify commercial banks that are standalone firms or are owned by small BHCs by identifying all banks whose high holder does not submit a FR Y-9C report.

Separate statistics are also reported for the subset of BHCs with greater than $500 billion in total assets, for the subset of BHCs with $50-$500 billion in total assets, and for the remainder of the industry. In 2014:Q3, 33 BHCs exceed $50 billion in total assets, 6 of which exceeded the $500 billion threshold: JPMorgan Chase, Bank of America, Citigroup, Wells Fargo, Goldman Sachs, and Morgan Stanley. For consistency, time-series graphs for the “>$500bn” and “$50-$500bn” groups represent available historical values for this same subset of firms. Statistics for most firms with more than $50 billion in total assets are prepared on a pro forma (merger-adjusted) basis; specifically, on the basis that all BHCs acquired by each of these firms over the sample period with US regulatory filings are part of the consolidated BHC from the start of the historical time period. Data values of acquired BHCs are then summed with acquirer data in the period before the acquisition. Merger events are identified using the NIC transformations table maintained by the Federal Reserve Board of Governors. Note that three BHCs with more than $50 billion in total assets are not adjusted using the pro forma methodology: TD Bank, Bancwest, and Deutsche Bank Trust Corporation. After constructing the pro forma series for each firm, we aggregate the data to create the “BHCs >$500bn” and the “BHCs $50-$500bn” series. Finally, the “all other banks and BHCs” quarterly series is constructed by subtracting the “BHCs >$500bn” and “BHCs $50-$500bn” series from the “all institutions” series.

3 The term “foreign banking organization” generally refers to a foreign bank that (1) operates a branch, agency, or commercial lending company subsidiary in the United States; (2) controls a bank in the United States; or (3) controls an Edge corporation acquired after March 5, 1987. The term also includes any company of which such a foreign bank is a subsidiary. See 12 C.F.R. § 211.11(o).
The charts and tables presented in this report are grouped into the following five categories: composition of banking industry assets and liabilities, earnings and pre-provision net revenue, asset quality, capital adequacy and asset growth, and consolidated financial statistics for the fifty largest BHCs. Definitions of each plotted variable are presented on each chart.

Caveats and limitations

Statistics in this report are presented “as is”, based on calculations conducted by Federal Reserve Bank of New York research staff. While significant efforts have been made to ensure accuracy, the statistics presented here may be subject to future revision, for example because of changes or improvements in the “pro forma” methodology used to calculate statistics for industry subgroups.

We highlight a number of important limitations of the statistics presented here:

- Statistics exclude financial firms that are not either commercial banks or part of a commercial bank holding company. This creates discontinuities in the time-series graphs when nonbanking firms are acquired or sold by banks or BHCs, or when firms switch to or from a bank or BHC charter. For example, in 2009:Q1, Goldman Sachs, Morgan Stanley, Ally Financial, and American Express each began filing a FR Y-9C due to the conversion of each of these firms to a commercial banking holding company charter. This largely accounts for the sharp 13% increase in total measured industry assets in 2009:Q1, and a corresponding discontinuous upward shift in the industry asset growth rate during 2009.

- For the same reason, only 4 of the 6 BHCs in the BHCs >$500bn group (described in the methodology section on the previous page) exist in the data for the entire sample period (1991:Q1 to 2014:Q3): JPMorgan Chase, Bank of America, Wells Fargo, and Citigroup. Goldman Sachs and Morgan Stanley enter the sample in 2009:Q1.

- Flow variables in bank and BHC regulatory filings are reported on a year-to-date basis. Quarterly flow variables are derived by “quarterizing” the data, that is, by subtracting the variable at time t-1 from the variable at time t for Q2, Q3, and Q4 of each calendar year. This quarterization procedure can create discontinuities when a bank or BHC enters the sample any time other than in Q1. To account for this, we average the value of flow variables for mid-year entrants using up to four subsequent consecutive quarters of data to generate a usable data point for the quarter of entry. If an institution is in the sample for only one quarter, we drop the flow variables from the firm’s quarter of entry from the sample.

- Due to data limitations, industry statistics exclude nonbank subsidiaries of small BHCs that do not file a FR Y-9C (currently the FR Y-9C is filed only by firms with $500m in total assets). The effect of this exclusion on industry statistics is
expected to be minor, however, since small BHCs generally do not have large nonbank subsidiaries.

- As part of the transition to Basel II/III, in 2014:Q1, advanced approaches\(^4\) holding companies commenced filing Part I.B. of schedule HC-R of the Y-9C, and no longer file Part 1.A of this schedule. (Part 1.A of schedule HC-R is still filed by non-advanced-approaches firms). One consequence of this reporting change is that advanced approaches firms no longer report the components used to calculate tier 1 common equity, and instead report common equity tier 1 (CET1). The change in reporting also affects other capitalization measures such as tier 1 capital. This report presents capital ratios that combine the capital reported in Part 1.A and Part 1.B reported by firms. It does not attempt to adjust measured capital ratios to account for the methodological differences between these two measures.

- The implementation of the Basel II.5 US market risk rule in 2013:Q1 affects the measurement of risk-weighted assets beginning in that quarter.

**Data notes**

1. The definition of tier 1 common equity for BHCs used for this report is: tier 1 common equity = tier 1 capital – perpetual preferred stock and related surplus + nonqualifying perpetual preferred stock – qualifying Class A noncontrolling (minority) interests in consolidated subsidiaries – qualifying restricted core capital elements (other than cumulative perpetual preferred stock) – qualifying mandatory convertible preferred securities of internationally active bank holding companies. The definition of tier 1 common equity for banks is: tier 1 common equity = tier 1 capital – perpetual preferred stock and related surplus + nonqualifying perpetual preferred stock – qualifying noncontrolling (minority) interests in consolidated subsidiaries.

2. The definition of CET1 for BHCs used for this report is: common equity tier 1 = common & treasury stock + retained earnings + accumulated other comprehensive income + CET1 minority interest – goodwill – other intangible assets – gains on cash flow hedges – cumulative DVA – other deductions before threshold deductions – nonsignificant investments in unconsolidated financial institutions – significant investments in unconsolidated financial institutions (10% threshold deduction) – MSAs (10% threshold deduction) – deferred tax assets from temporary timing differences (10% threshold deduction) – 15% threshold deduction – deductions due to insufficient tier 1 and tier 2.

---

3. In the first quarter of 2010, banking organizations were required to transfer certain off-balance sheet items onto their balance sheets under FASB 166 and 167. These guidelines substantially affected loan balances, as large amounts of securitized loans were transferred onto bank balance sheets. This accounting change was likely a major factor influencing year-over-year growth rates of loans and total assets during this period, potentially causing these growth rates to appear larger than they would have otherwise been.