

**BANK HOLDING COMPANY/FINANCIAL HOLDING COMPANY
CONSUMER COMPLIANCE RISK ASSESSMENT
BANK AND NONBANK SUBSIDIARIES**

Institution Name: **Citigroup Inc.**

**Citigroup, Inc
As of December 31, 2007**

To: Calvin Bailey, Legal and Compliance Risk Coordinator

Date: July 15, 2008

Primary Contact: Jerold Freier

Portfolio Team Leader: Alan Dombrow

Prepared by: Jerold Freier

Dollar Amounts (000s)

RSSD:	<i>1951350</i>
Total BHC Assets:	<i>\$2,187,631,000</i>
Total BHC Capital:	<i>\$113,598,000</i>
Total BHC Loans:	<i>\$858,438,000</i>

This is an assessment of Citigroup's consumer compliance management risk profile and its ability to manage these compliance risks.

GENERAL OVERVIEW

Supervisory Ratings

RSSD	Event	Entity/Business	Date	Rating	Regulator
1951350	RFI/C(D)	Citigroup Inc.	12-31-07	332/3 (3)	FRBNY
476810	CAMELS	Citibank N.A.	12-31-07	2-2-3-3-3-3/3	OCC
476810	CRA	Citibank N.A.	12-31-07	Outstanding	OCC
476810	Cons. Compliance	Citibank N.A.	12-31-07	Satisfactory	OCC
476810	Trust	Citibank N.A.	12-31-07	Satisfactory	OCC
476810	Information T	Citibank N.A.	12-31-07	Satisfactory	OCC
486752	CAMELS	Citibank (South Dakota) N.A.	12-31-07	2-2-2-2-2-2/2	OCC
486752	CRA	Citibank (South Dakota) N.A.	12-31-07	Outstanding	OCC
486752	Cons. Compliance	Citibank (South Dakota) N.A.	12-31-07	Strong	OCC
486752	Information T	Citibank (South Dakota) N.A.	12-31-07	Satisfactory	OCC
3382547	CAMELS	Department Stores NB	12-31-07	2-2-2-2-2-2/2	OCC
3382547	Cons. Compliance	Department Stores NB	12-31-07	Strong	OCC
3382547	Information T	Department Stores NB	12-31-07	Satisfactory	OCC
449038	CAMELS	Citicorp Trust N.A.	12-31-07	1-1-2-1-2-2/2	OCC
449038	Cons. Compliance	Citicorp Trust N.A.	12-31-07	Satisfactory	OCC
449038	Trust	Citicorp Trust N.A.	12-31-07	Satisfactory	OCC
449038	Information T.	Citicorp Trust N.A.	12-31-07	Satisfactory	OCC
3398306	CAMELS	Citigroup Trust-Delaware N.A.	12-31-07	1-1-2-1-2-2/2	OCC
3398306	Cons. Compliance	Citigroup Trust-Delaware N.A.	12-31-07	Satisfactory	OCC
3398306	Trust	Citigroup Trust-Delaware N.A.	12-31-07	Satisfactory	OCC
3398306	Information T.	Citigroup Trust-Delaware N.A.	12-31-07	Satisfactory	OCC
374112	CAMELS	Citicorp Trust Bank FSB	2-12-07	2-2-2-1-1/2	OTS

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Supervisory Target Reviews

Control	Regulation/Guideline	Entity/Business	Year	Rating	Regulator
Risk Self Assess.		Citigroup and subsidiaries	2007	Satisfactory	FRB/OCC
	Information Security	Citigroup and subsidiaries	2007	Satisfactory	FRB
Compliance testing		Citigroup and subsidiaries	2007	Satisfactory	OCC
Internal Audit		Citigroup and subsidiaries	2007	Satisfactory	FRB
	Fair Lending/HMDA	(COIC) CitiFinancial---Puerto Rico	2006	Fair	FRB
	Truth in Lending	(COIC) CitiFinancial---Puerto Rico	2008	Satisfactory	FRB
	RESPA	(COIC) CitiFinancial---Puerto Rico	2008	Satisfactory	FRB
	Flood Insurance	(COIC) CitiFinancial---Puerto Rico	2008	Weak	FRB
Board Oversight		CitiFinancial Auto	2007	Satisfactory	FRB
	Fair Lending	CitiFinancial Auto	2007	Satisfactory	FRB
	Reg P, Z, FCRA etc	CitiFinancial Auto	2007	Satisfactory	OCC
	Reg D, E and CC	Citibank (Depository Services)	2007	Fair	OCC
	Reg B,P, Z, FCRA etc	Citibank (Overdraft and other unsecured)	2007	Satisfactory	OCC
	Flood Insurance	Citibank (CitiMortgage)	2007	Weak	OCC
	Reg B,P, Z, FCRA etc	Citibank (CitiMortgage)	2007	Satisfactory	OCC
	Reg Z	Citibank (CitiMortgage)---HELOC's	2007	Fair	OCC
	HMDA	Citibank (CitiMortgage)	2007	Satisfactory	OCC
Compliance Risk Mgt.		Citibank (CitiMortgage)	2007	Less than Satisf.	OCC
	Flood Insurance	Citibank (Commercial Business)	2007	Fair	OCC

Business Sectors

Citigroup, Inc. (Citigroup or Citi) is a diversified global financial holding company that provides a broad range of financial services. Citigroup’s day-to-day operations are managed through four business segments. The consumer businesses for which the banking agencies have primary consumer compliance supervisory responsibility are located in the U.S. portion of the Global Consumer Group ("GCB") business segment. During 2007 the U.S. business activities product lines which comprised the GCG business segment were managed as four product lines: Cards, Consumer Lending, Retail Distribution and Commercial Business.