



PUBLIC DISCLOSURE

January 24, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

EH National Bank
Charter Number 24493

9701 Wilshire Boulevard
Beverly Hills, California 90211

Office of the Comptroller of the Currency

San Francisco Field Office
25 Jessie Street at Ecker Square, Suite 1600
San Francisco, California 94105

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

OVERALL CRA RATING.....	1
DESCRIPTION OF INSTITUTION	2
SCOPE OF THE EVALUATION	3
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....	4
STATE RATING	5
State of California	5
LENDING TEST	8
APPENDIX A: SCOPE OF EXAMINATION.....	APPENDIX A-1
APPENDIX B: SUMMARY OF MMSA AND STATE RATINGS	APPENDIX B-1
APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS	APPENDIX C-1
APPENDIX D: TABLES OF PERFORMANCE DATA.....	APPENDIX D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The Lending Test rating is based on performance in the Los Angeles-Long Beach-Glendale, California Metropolitan District (MD) Assessment Area (AA) (Los Angeles MD AA) and specifically on the following performance criteria:

- The bank's Loan-to-Deposit ratio is reasonable.
- The bank originated a majority of its loans within the AA.
- The bank's distribution of residential mortgage loans and commercial loans is reasonable.
- The bank's distribution of loans to businesses of different sizes is reasonable.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio is reasonable.

The bank's average quarterly LTD ratio for the ten quarters between September 30, 2018 and December 31, 2020 was 112.4 percent. During this period, the bank's LTD ratio ranged from a quarterly low of 99 percent to a quarterly high of 129.4 percent. The bank's LTD ratio is comparable to the quarterly average over the same period of five area peer banks. The average quarterly ratio for these banks was 96.1 percent and ranged from a low of 78.3 percent to a high of 113.4 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its AA.

The bank originated and purchased 66.4 percent by number and 64.5 percent by dollar amount of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The inside and outside analysis is based on all residential mortgage loans and all commercial loans originated during this period.

In 2020, the bank participated in the Paycheck Protection Program (PPP). The program was designed to provide financial relief for businesses nationwide due to the COVID-19 pandemic, and participation in this program aligns with the spirit of the CRA. Commercial loans made by the bank under the PPP program in 2020 did not materially impact the inside/outside ratio.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				
	Inside		Outside			Inside		Outside		Total
	#	%	#	%		#	\$	%	\$	%
Residential Mortgages										
2018	15	71.4	6	28.6	21	12,341	56.0	9,698	44.0	22,039
2019	25	86.2	4	13.8	29	33,886	90.9	3,379	9.1	37,265
2020	40	70.2	17	29.8	57	49,870	67.5	23,959	32.5	73,829
Subtotal	80	74.8	27	25.2	107	96,098	72.2	37,035	27.8	133,133
Commercial Loans										
2018	14	70.0	6	30.0	20	76,674	41.8	106,714	58.2	183,388
2019	13	56.5	10	43.5	23	90,380	65.8	47,071	34.2	137,451
2020	55	58.5	39	41.5	94	131,601	83.5	25,975	16.5	157,576
Subtotal	82	59.9	55	40.1	137	298,655	62.4	179,760	37.6	478,415
Total	162	66.4	82	33.6	244	394,753	64.5	216,795	35.5	611,548
<i>Source: Bank Data</i>										
<i>Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

EH National Bank (EHNB or bank) is a full-service commercial bank headquartered in Beverly Hills, California. EHNB operates one full-service branch, with an ATM machine inside the lobby, which is located at 8484 Wilshire Boulevard in Beverly Hills, California. The bank maintains operations only in the state of California and operates in one AA, the Los Angeles-Long Beach-Glendale MD. This AA is entirely within the state of California. EHNB is not the subsidiary of a holding company, and there are no affiliates.

The bank began operations in 2005 with a primary, short-term credit strategy of originating Small Business Administration (SBA) and other federally guaranteed loans to businesses throughout the United States and sold these loans on the secondary market. Since 2011, the bank's business strategy changed to focus on lending to small businesses within its AA. EHNB offers commercial loan products such as loans secured by commercial real estate, commercial and industrial loans, and lines of credit. The bank also offers loans secured by investment residential real estate such as multifamily apartment buildings and 1-4 family single family homes. The bank does not offer consumer credit products. EHNB was an active participant in the PPP lending program. As of December 31, 2020, the bank extended 78 PPP loans.

As of December 31, 2020, total assets were \$283.7 million, net loans were \$224.7 million, and total deposits were \$226.2 million. Net loans represented 79.2 percent of total assets. Common equity tier 1 capital totaled \$30.7 million. The following table provides a summary of the mix of loans by product type.

Loan Portfolio Summary by Loan Product December 31, 2020	
Loan Category	% of Gross Loans and Leases
Commercial Real Estate	43.5
Multifamily Housing (Residential Mortgages)	43.2
Commercial and Industrial	8.3
Total 1-4 Family	4.1
PPP Loans	2.9

Source: Call Report 12/31/2020

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assesses the CRA performance of EHNB using Small Bank CRA examination procedures. The OCC performed a full-scope examination of the bank's sole AA. For the lending test, the OCC analyzed the bank's two primary types of loan products: commercial loans to businesses of all sizes and residential mortgages. The analysis of these two products covered the period between January 1, 2018 and December 31, 2020. The OCC gave equal weight to both of these loan products. During the evaluation period, the bank originated 82 commercial loans totaling \$298.7 million and 80 residential loans totaling \$96.1 million within the Los Angeles MD AA.

Commercial loans (loans to small businesses) include loans secured by owner-occupied and non-owner-occupied commercial real estate, loans secured by business assets, as well as loans made under the PPP program in 2020. Residential mortgage loans include loans secured by multifamily properties, investment 1-4 family residences, and mixed-use income-producing properties where revenue is generated from both commercial and residential units. With the exception of a small number of loans secured by 1-4 family residences for business and investment purposes, the bank did not originate any other single-family home mortgage loans during the evaluation period.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The bank's rating is based on the rating for the state of California. The bank has one AA, which is identified as the Los Angeles-Long Beach-Glendale MD; also referred to as the Los Angeles MD AA. The bank's rating considered lending performance in relation to its primary loan products of residential mortgage loans and commercial loans to businesses.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of California

CRA rating for the State of California: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank’s geographic distribution of residential mortgage and small business loans is reasonable.
- The bank’s distribution of loans to businesses of different sizes is reasonable.

Description of Institution’s Operations in California

The bank’s Los Angeles MD AA includes all of the census tracts in Los Angeles County. These tracts are part of the Los Angeles-Long Beach-Glendale MD. According to the U.S. Census Bureau, the AA has a total estimated population of 10.01 million as of April 1, 2020, which is a 2.0 percent increase since the 2010 census. The estimated AA population grew slower than the population of the state of California, which saw a 6.1 percent increase since the 2010 Census.

Table A – Demographic Information
Assessment Area: Los Angeles-Long Beach-Glendale MD (2020)

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,346	9.4	28.7	24.9	34.8	2.2
Population by Geography	10,038,388	8.6	29.3	26.3	35.1	0.8
Housing Units by Geography	3,476,718	7.8	26.3	24.8	40.6	0.5
Owner-Occupied Units by Geography	1,499,879	2.4	17.2	26.6	53.7	0.1
Occupied Rental Units by Geography	1,763,190	12.2	34.2	23.6	29.2	0.9
Vacant Units by Geography	213,649	8.7	25.4	22.8	42.2	1.0
Businesses by Geography	941,441	4.6	18.9	21.2	52.8	2.4
Farms by Geography	8,629	2.7	17.6	24.9	53.6	1.1
Family Distribution by Income Level	2,186,485	24.5	16.3	16.7	42.4	0.0
Household Distribution by Income Level	3,263,069	25.9	15.4	15.8	43.0	0.0
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA		\$62,703	Median Housing Value			\$495,540
			Median Gross Rent			\$1,292
			Families Below Poverty Level			14.3%

Source: 2015 ACS and 2020 D&B Data

Due to rounding, totals may not equal 100.0% (*)

The NA category consists of geographies that have not been assigned an income classification.

According to the U.S. Census Bureau's American Community Survey (ACS), 24.5 percent of families in the AA are low-income and 16.3 percent are in moderate income. The 2015 ACS also indicates that 38.1 percent of the census tracts are low- or moderate-income and 40.8 percent of all families in the AA reside in low- or moderate-income census tracts. The percentage of families in the AA living below the poverty level is moderate at 14.3 percent.

Competition

Competition in Los Angeles County is strong. EHN B operated one branch in the AA as of December 31, 2020 with no branches in other locations. Based on the Federal Deposit Institution Corporation (FDIC) Deposit Market Share data as of June 30, 2020, deposits totaled \$522 billion in the AA. EHN B ranked 73 out of 98 financial institutions with \$208 million in deposits, representing 0.04 percent market share. The three largest banks by deposit market share are Bank of America, JP Morgan Chase Bank, and Wells Fargo Bank, with a combined deposit market share of 43.1 percent. As of June 30, 2020, those institutions operated a combined total of 769 offices in the AA. The remaining 56.9 percent of combined deposit market share in the AA is fragmented among 83 banks, each holding less than one percent of the market.

There is significant competition for small business loans in the AA. According to the 2020 CRA Small Business Aggregate data, the most recent data available, there are 189 small business loan reporters in the AA. The top four lenders were Bank of America, Wells Fargo Bank, JPMorgan Chase Bank, and American Express National Bank with a combined total of 65.6 percent of market share. As a small bank, EHN B is not required to publicly report small business lending data and is not included in the abovementioned market share report.

There is significant competition in the AA for multifamily loans. According to the 2020 CRA Multifamily Aggregate data, there are 104 multifamily loan reporters in the AA. The top four lenders were JPMorgan Chase Bank, First Republic Bank, Luther Burbank Savings, and First Foundation Bank with a combined total of 59.5 percent of market share. As a non-HMDA reporting bank, EHN B is not required to publicly report multifamily lending data and is not included in the abovementioned market share report.

Employment and Economic Factors

The primary economic drivers of the area are medical services, high technology, education, and professional services. According to the Bureau of Labor Statistics, the average annual unemployment rate in the Los Angeles AA was relatively stable in 2018 and 2019 at 4.7 percent and 4.6 percent, respectively. However, the average annual unemployment rate increased in 2020 to 12.8 percent with much higher rates of unemployment beginning in April due to the COVID-19 pandemic. According to the California Economic Development, Los Angeles County report in 2020, the major employers in Los Angeles County (with 10 thousand or more employees) are Cedars-Sinai Medical Center, Los Angeles International Airport, University of California Los Angeles, and VXI Global Solutions.

Housing

Housing in Los Angeles County is expensive, and affordable housing for low- and moderate-income households present a need in the AA. Based on 2019 ACS 1-Year data, the housing affordability ratio is 8.85 in Los Angeles County. The affordability ratio in Los Angeles County is higher than the statewide ratio of 7.07 percent and significantly higher than the countrywide ratio of 3.65 percent. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. A higher value affordability ratio indicates housing is more expensive.

Area	Median Household Value (Owner-Occupied)	Median Household Income	Housing Affordability Ratio
Los Angeles County	\$644,100	\$72,797	8.85
California	\$568,500	\$80,440	7.07
United States	\$240,000	\$65,712	3.65

Source: 2019 ACS Data

The 2015 ACS reports 43.1 percent of the total housing units in the AA as owner-occupied, with rental-occupied units at 50.7 percent and vacant units at 6.1 percent. There are 270,711 housing units in low-income geographies with 13.5 percent of these units being owner-occupied, 79.7 percent renter-occupied, and 6.8 percent vacant. There are 914,450 housing units in moderate-income geographies with 28.2 percent of these units being owner-occupied, 65.9 percent renter-occupied, and 5.9 percent vacant. The percentage of owner-occupied housing units in low- and moderate-income (LMI) census tracts is significantly lower than in middle- and upper-income geographies. Owner-occupied units represent 46.2 percent and 57.1 percent of units in middle- and upper-income census tracts, respectively.

Community Contacts

Three community contacts conducted in the AA were reviewed as part of this performance evaluation. Community contacts included organizations focused on community revitalization, affordable housing creation, and small business lending. The contacts identified affordable housing, financial literacy and homeownership education, and affordable loan programs as credit needs.

Scope of the Evaluation in California

EHNB only serves the Los Angeles MD AA. The OCC performed a full-scope evaluation of the bank's only assessment area using Small Bank CRA procedures. There were no limited-scope review areas. As previously noted, EHNB's primary loan products, based on originations and purchases during the evaluation period, are residential mortgages and commercial loans.

LENDING TEST

The bank's performance under the Lending Test in the state of California is rated Satisfactory.

Conclusions for Los Angeles MD AA, Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Los Angeles MD AA is reasonable. The analysis of the lending test included residential mortgage loans and commercial loans.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state of California.

Residential Mortgage Loans

Refer to Table O in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's residential mortgage loan originations and purchases.

The bank exhibits reasonable geographic distribution of residential mortgages in the AA. The bank's lending in low-income geographies of 26.3 percent exceeded both the peer aggregate of 15.2 percent and the demographic of 12.6 percent. For moderate-income geographies, the bank's lending compares favorably at 40.0 percent compared with a demographic of 30.7 percent and its peer group of 35.5 percent.

Small Loans to Businesses

Refer to Table Q in the California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank exhibits reasonable geographic distribution of small business loans in the AA. The bank's lending in low-income geographies of 7.3 percent compares favorably to the demographic of 4.6 percent and to the peer group of 4.8 percent. For moderate-income geographies, the bank's lending is comparable at 20.7 percent to the peer group of 19.2 percent and the demographic of 18.9 percent.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank. This analysis does not consider residential mortgage loans because borrower income data is not required to be collected on multifamily loans.

Small Loans to Businesses

Refer to Table R in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The bank's distribution of small business loans within the AA is reasonable. The percentage of loans originated to businesses with gross annual revenues of \$1 million or less (small businesses) is significantly lower than the percentage of small businesses within the AA. In addition, the bank's performance is lower than its peer group.

During 2020, the bank actively participated in the PPP and loans made through this program did not require the collection of gross annual revenue during the underwriting process. As such, the volume of PPP loans granted materially impacted the bank's percentage of loans granted to small businesses. If the PPP loans are removed from the sample, the percentage of total loans originated to small businesses by the bank improves to 59.5 percent. The bank's performance in this context is comparable to the peer group performance of 41.7 percent, but still lower than the demographic of 89.7 percent. In 2018, the percentage of bank loans to small businesses was 78.6 percent, which is comparable to the demographic of 87.2 percent, and exceeds the peer group performance of 47.2 percent. In 2019, the percentage of bank loans to small businesses was 69.2 percent, which is lower than the demographic of 89.2 percent but comparable to the peer group of 51.2 percent. In 2020 (analyzed without the PPP loans), the percentage of bank loans to small businesses was 20.0 percent, which is significantly lower than the demographic of 89.7 percent and the peer group of 41.7 percent.

Responses to Complaints

The OCC and the bank have not received any CRA-related complaints in the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	1/1/2018 – 12/31/2020	
Bank Products Reviewed:	Residential Mortgage Loans and Commercial Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Los Angeles—Long Beach—Glendale California MD	Full Scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS	EH National Bank
Overall Bank:	Lending Test Rating
EH National Bank	Satisfactory
MMSA or State:	
State of California	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to

determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Residential Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Residential Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Residential Mortgage Loans by Income Category of the Geography																		2018-20		
	Total Residential Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$	% of Total	Overall Market	% of Multifamily Units	% Bank Loans	Aggregate	% of Multifamily Units	% Bank Loans	Aggregate	% of Multifamily Units	% Bank Loans	Aggregate	% of Multifamily Units	% Bank Loans	Aggregate	% of Multifamily Units	% Bank Loans	Aggregate	
Los Angeles MD (2020)	80	96,098	100.0	451,346	12.6	26.3	15.2	30.7	40.0	35.5	21.8	20.0	22.9	33.5	12.5	26.0	1.4	1.3	0.5	
Total	80	96,098	100.0	451,346	12.6	26.3	15.2	30.7	40.0	35.5	21.8	20.0	22.9	33.5	12.5	26.0	1.4	1.3	0.5	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Residential Mortgage Loans by Income Category of the Borrower																		2018-20		
	Total Residential Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Los Angeles (2020)	80	96,098	100.0	451,346	24.5	--	2.1	16.3	--	5.8	16.7	--	15.3	42.4	--	60.3	0.0	100.0	16.5	
Total	80	96,098	100.0	451,346	24.5	--	2.1	16.3	--	5.8	16.7	--	15.3	42.4	--	60.3	0.0	100.0	16.5	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Note: The bank was not a HMDA Reporter and thus not required to report income information on multifamily loans and mixed-use CRE with a residential purpose. All loans in the sample were "Not Available" under the income category.

Table Q: Assessment Area Distribution of Loans to Businesses by Income Category of the Geography																		2018-20		
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Los Angeles MD (2020)	82	298,655	100.0	386,037	4.6	7.3	4.8	18.9	20.7	19.2	21.2	11.0	21.4	52.8	58.5	52.7	2.4	2.4	2.0	
Total	82	298,655	100.0	386,037	4.6	7.3	4.8	18.9	20.7	19.2	21.2	11.0	21.4	52.8	58.5	52.7	2.4	2.4	2.0	

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Businesses by Gross Annual Revenues												2018-20	
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Los Angeles-MD (2020)	82	298,655	100.0	386,037	89.7	26.8	41.7	4.4	14.6	6.0	58.5		
Total	82	298,655	100.0	386,037	89.7	26.8	41.7	4.4	14.6	6.0	58.5		

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*