



PUBLIC DISCLOSURE

May 08, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

California International Bank, A National Banking Association
Charter Number: 24577

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Suite C
Westminster, CA 92683-7582

Office of the Comptroller of the Currency

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Suite 1050
Santa Ana, CA 92705

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.

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the full-scope review of the bank's sole assessment area (AA) in California.
- More than reasonable loan-to-deposit (LTD) ratio.
- Substantial majority of lending inside of the AA.
- Reasonable lending distribution by geography.
- Reasonable lending distribution by business revenue.
- Adequate responsiveness to community development needs in the state through community development services and qualified investments.

Loan-to-Deposit Ratio

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

OCC examiners analyzed California International Bank, N.A.'s (CIB or the bank) quarterly average LTD ratio since the prior Community Reinvestment Act (CRA) examination as of December 31, 2017, through December 31, 2021. The bank's average LTD for this period was 96.2 percent. The ratios ranged from a quarterly low of 60.9 percent to a quarterly high of 136.9 percent. The bank participated in the Small Business Administration (SBA) Paycheck Protection Program (PPP) in 2020 and 2021, which is reflected in the quarterly high of 136.9 percent. CIB's average LTD ratio is higher than the average LTD ratio of three comparable banks. The combined average quarterly LTD ratio for the comparable banks over the same period was 81.8 percent, ranging from a low of 47.7 percent to a high of 109.0 percent. For purposes of comparison, we selected one bank that CIB considers a direct competitor with assets less than \$500 million. We also selected two institutions with similar asset size and deposit market share within the AA. The comparable banks are California Business Bank, Asian Pacific National Bank, and Tustin Community Bank.

Lending in Assessment Area

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

The bank originated and purchased 85.0 percent of total loans inside its 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. OCC examiners calculated the percentage of loans inside the AA from a sample of 20 commercial loans originated or purchased during the evaluation period.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	17	85.0	3	15.0	20	1,981	84.9	351	15.1	2,332
Total	17	85.0	3	15.0	20	1,981	84.9	351	15.1	2,332

Description of Institution

CIB is an independent full-service community bank headquartered in Westminster, California. The bank opened in November 2005, and has been devoted to serving the financial needs of the business community located in Southern California, with specific focus to the Vietnamese community. CIB operates one full-service branch located in the “Little Saigon” area of Westminster, California, in a middle-income census tract (CT). The area is a heavily populated, primarily Vietnamese-speaking community within Orange County, California. In January 2016, the bank changed its name from Saigon National Bank. The bank is a federally designated Minority Depository Institution, which enables other financial institutions to make qualified CRA community development investments through deposits placed at CIB.

Throughout the evaluation period, the board designated all of Orange County and part of Los Angeles County as the bank’s AA. Both counties are within the Los Angeles-Long Beach-Santa Ana, California, Metropolitan Statistical Area (MSA). As of December 31, 2021, Orange County consisted of 583 CTs. The bank considers the portion of Los Angeles County south of Highway 118 and the Angeles National Forest as part of the AA, which consists of 2,346 CTs. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate- income (LMI) geographies. There were no branch closures, openings, mergers, or acquisitions during the evaluation period.

CIB offers traditional lending products with an emphasis on commercial real estate lending and commercial and industrial loans. The bank does not offer consumer or residential real estate loans. The bank also offers traditional banking services, including consumer and business checking and saving accounts, and certificates of deposits. The bank does not maintain an automated teller machine (ATM). However, the bank reimburses ATM fees incurred through the Star Network, which includes over two million ATMs. Business hours are Monday through Friday 9:00am – 5:00pm, with teller lines open from 9:00am – 3:00pm. The bank provides customers with 24-hour access to account information via online banking. Online services include account information, bill pay, and funds transfer.

In response to the COVID-19 pandemic, management remained open with the reduced hours of 9:00am – 3:00pm. In 2020, the bank operated as appointment-only, but expanded back to walk-in in 2021. The bank participated in the SBA PPP and the Main Street Lending Program in 2020 and 2021. The bank also offered loan principal payment deferrals for their customers.

As of December 31, 2021, CIB reported total assets of \$89.9 million, and total equity capital of \$11.5 million. Total loans were \$51.0 million, representing 56.7 percent of total assets. The bank had \$77.8 million in total deposits and no foreign deposits. The following chart summarizes the loan portfolio by major loan type.

California International Bank, N.A. Loan Portfolio by Major Product Type As of December 31, 2021		
Loan Type	(\$000's)	% of Portfolio
Nonfarm Nonresidential Real Estate	26,466	51.8
Commercial & Industrial	23,973	47.0
Multifamily Residential Real Estate	602	1.2
Construction & Development	0	0.0
1-4 Family Residential Real Estate	0	0.0
Farmland & Agricultural	0	0.0
Consumer	0	0.0
Total	51,041	100.0

During the evaluation period, the bank operated under a formal enforcement action relating to safety and soundness concerns. The enforcement action required time, staff effort, and financial resources to correct deficiencies. OCC examiners took these factors into account when reaching our conclusions concerning the bank's CRA performance. CIB received a "Satisfactory" rating under the "Small Bank" rating criteria at the previous CRA examination dated January 14, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the CRA performance of CIB using Small Bank CRA examination procedures. We performed a full-scope examination of the bank's single AA. We evaluated the bank's designated Los Angeles County AA and Orange County AA as the Los Angeles-Long Beach-Santa Ana, California MSA AA. Refer to Appendix A for detailed information.

Consistent with the bank's business strategy, OCC examiners reviewed the bank's primary product of business loans. The bank also submitted community development activities for consideration. The evaluation period for the lending test and community development activities is from January 1, 2019, through December 31, 2021. As the bank is not a CRA loan data reporter, we used a random sample of 20 loans to complete the lending test.

With an evaluation period end date of December 31, 2021, qualifying activities performed in response to the significant impact the COVID-19 pandemic had on economies across the United States are addressed in this evaluation. This includes 177 PPP loans originated in 2020 and 2021.

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 AA's 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.

CIB has only one AA. All weighting for the evaluation is placed on performance in the Los Angeles-Long Beach-Santa Ana MSA AA.

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 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:

- Substantial majority of lending inside of the AA.
- Reasonable geographic distribution.
- Reasonable distribution of loans to businesses of different sizes.

Description of Institution's Operations in California

The bank has one AA composed of the entire Orange County, and part of Los Angeles County. Both counties are within the Los Angeles-Long Beach-Santa Ana, California MSA. For Los Angeles County, CIB has designated the CTs south of Highway 118 and the Angeles National Forest as their AA. The designated AA includes a total of 2,738 CTs: 257 low-income CTs, 784 moderate-income CTs, 705 middle-income CTs, and 944 upper-income CTs. In addition, 48 CTs do not report data and are listed as not applicable. The AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate- income geographies.

CIB's strategy is to provide lending products to businesses in their AA. Business loans include commercial real estate and commercial and industrial loans. The bank participates in SBA lending products. The bank has one branch within the AA, and does not maintain an ATM. However, the bank provides fee reimbursement for a network of over two million ATMs. Competition from other financial institutions is strong in the AA. As of June 30, 2021, the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share report indicates the bank's deposits in Orange and Los Angeles Counties are \$70,994 and ranks 102nd in the deposit market share with 0.01 percent of the AAs deposits. A total of 116 financial institutions, with a total of 2,225 branches, competed for over \$767 million of insured deposits in Orange and Los Angeles Counties. The top three institutions include Bank of America, JP Morgan Chase, and Wells Fargo with a combined total of \$351 million in deposits representing 45.8 percent of the deposit market share.

The top industries in the AA include healthcare, tourism, and technology. The top employers in the AA include hospitals, universities, Los Angeles Airport, and Disney Resorts. The unemployment rate within the AA remains above the pre-COVID-19 pandemic levels, and is not forecasted to fall below those levels until 2023. Additionally, the AA has a higher business cost than the United States.

To assess community needs, we reviewed four community contact interviews completed in the AA, and also discussion notes of a CRA listening session. The community contacts included non-profits providing financial literacy in schools, financial counseling, and affordable housing and economic-

resilience programs. Additionally, there was a contact from a non-profit business lender. One contact shared that minority and women owned entrepreneurs, mainly located in LMI geographies, have difficulty obtaining small business loans due to the businesses not having two to three years of business activity or other sources of income as required by banks. The contacts shared that the AA has been deeply impacted by the pandemic, resulting in high unemployment, and increased homelessness. This results in a need for financial literacy and counseling programs for youth and adults. Additionally, there is limited housing stock in the AA, resulting in the need for affordable housing and credit counseling. The community contacts shared that banks may participate by volunteering, providing donations to non-profits focused on these needs, providing credit building loans to consumers, and by establishing programs offering start-up loans.

The information in the following table provides Los Angeles-Long Beach-Santa Ana, California MSA AA demographic information for 2021.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Los Angeles-Long Beach-Santa Ana, California MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,738	9.4	28.6	25.7	34.5	1.8
Population by Geography	12,309,417	8.9	29.3	26.8	34.5	0.5
Housing Units by Geography	4,275,290	7.7	26.0	26.1	39.8	0.4
Owner-Occupied Units by Geography	1,917,580	2.8	17.7	27.4	52.1	0.1
Occupied Rental Units by Geography	2,105,990	12.1	33.8	25.1	28.3	0.7
Vacant Units by Geography	251,720	7.9	24.4	23.9	42.9	0.9
Businesses by Geography	1,470,017	4.9	19.5	24.6	49.0	1.9
Farms by Geography	13,884	3.8	18.6	26.6	50.0	1.0
Family Distribution by Income Level	2,720,235	24.7	16.4	17.0	41.9	0.0
Household Distribution by Income Level	4,023,570	25.9	15.6	16.1	42.4	0.0
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA		\$86,003	Median Housing Value			\$528,790
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA		\$62,703	Median Gross Rent			\$1,353
			Families Below Poverty Level			13.1%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in California

The CRA evaluation determines the bank’s record of meeting community credit needs. The OCC used a combination of bank and examiner generated loan and/or demographic reports to assess CRA performance. The evaluation period for both the lending and CD test is from January 1, 2019, through December 31, 2021. A full-scope review is completed for the bank’s AA, which assessed the primary products of business loans for the lending test. Refer to Appendix A for details.

Lending Test

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Los Angeles-Long Beach-Santa Ana, California MSA AA is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State.

Small Loans to Businesses

Refer to Table Q in the state of 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.

Within the sample of 20 loans, the amount of loans the bank originated and purchased in moderate-income CTs exceeded both the demographic percentage and aggregate lending, reflecting excellent distribution. The sample did not include any loans originated and purchased in low-income census tracts (CTs), which reflects poor distribution. However, the bank did originate loans in low-income CTs during the evaluation period.

Lending Gap Analysis

The OCC reviewed reports and maps and analyzed the bank's business lending activity over the evaluation period to identify any gaps in geographic distribution of loans in low-income CTs. The OCC did not identify any unexplained conspicuous gaps in the bank's AA. The bank's report of business loans reflects that the bank did originate loans in low-income CTs, both inside and outside of the AA. Out of the total loans inside the AA, 9.5 percent were originated in low-income CT's.

Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of loans to businesses different sizes, given the product lines offered by the bank.

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.

Within the sample of 20 loans, only two loans had gross annual revenue (GAR) data collected at origination. This is because the bank participated in the PPP in 2020 and 2021, which did not require the collection of GAR. A meaningful distribution analysis by revenue cannot be completed as 90 percent of the loans have revenue not available. As revenue information is not meaningful, OCC examiners analyzed the distribution by loan size as a proxy.

For the proxy, the analysis includes all of the business loans originated inside of the AA during the evaluation period. Assessing the loan size as a proxy for revenue of the borrower, the table below shows that approximately 92.1 percent of the number of loans originated and purchased by the bank during the evaluation period were in amounts equal to or less than \$1 million. This represents reasonable distribution in the AA. In addition, a majority of loans originated were in amounts equal to or less than \$100 thousand, reflecting responsiveness to the lending needs of small business.

Borrower Distributions of Loans to Businesses by Loan Size in Los Angeles-Long Beach-Santa Ana, California MSA AA				
Loan Size (000's)	Number of Loans	Percent of Number	Dollar Volume of Loans (000's)	Percent of Dollar Volume
\$0 - \$100,000	111	79.3	2,720	5.8
\$100,001 - \$250,000	24	17.1	4,048	8.7
\$250,001 - \$500,000	13	9.3	4,662	10.0
\$500,001 - \$1,000,000	14	10.0	10,208	21.8
Total	129	92.1	21,639	46.3
Over \$1,000,000	11	7.9	25,104	53.7

Responses to Complaints

The bank did not receive any CRA related complaints during the evaluation period.

Community Development

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area(s). Performance related to community development activities had a neutral effect on the bank's rating in the state.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Los Angeles-Long Beach-Santa Ana MSA	0	0	6	9	6	100.0	9	100.0	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

CIB demonstrated adequate responsiveness to CD investment opportunities. During the evaluation period, qualified investments totaled \$9,204. In 2020, the bank partnered with United Way in Orange County to complete free-tax returns for LMI individuals by becoming a Free Tax Preparation Site. All six donations were towards United Way and the Free Tax Preparation program, which included cash donations to the organization, and in-kind donations of equipment and office space. The bank's investments address the community need of financial literacy and counseling.

Extent to Which the Bank Provides Community Development Services

The bank's level of CD services reflect an adequate responsiveness to identified needs within the AA. During the evaluation period, CIB employees volunteered a total of 272 hours to the Free Tax Preparation program offered by United Way in Orange County. The bank became a Free Tax Preparation Site in 2020, available for walk-ins throughout the week and also Saturday's during tax season.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

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:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Small business loans Qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
California		
Los Angeles-Long Beach-Santa Ana MSA	Full-Scope	The AA consists of: <ul style="list-style-type: none"> • All CTs within Orange County • The CTs below highway 118 and the Angeles National Forest in Los Angeles County

Appendix B: Summary of MMSA and State Ratings

RATINGS	CALIFORNIA INTERNATIONAL BANK, NA
Overall Bank:	Lending Test Rating
California International Bank, NA	Satisfactory
State:	
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 Home Mortgage 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 owner-occupied 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 Home Mortgage 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 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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
LA- LB-SA MSA	20	\$3,325	100	575,082	4.9	0.0	4.9	19.5	30.0	20.2	24.6	50.0	25.4	49.0	20.0	47.9	1.9	0.0	1.6	
Total	20	\$3,325	100	575,082	4.9	0.0	4.9	19.5	30.0	20.2	24.6	50.0	25.4	49.0	20.0	47.9	1.9	0.0	1.6	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000's)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
LA- LB-SA MSA	20	3,325	100	575,082	90.6	10.0	45.4	3.9	0.0	5.6	90.0	
Total	20	3,325	100	575,082	90.6	10.0	45.4	3.9	0.0	5.6	90.0	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Tables O, P, S, T, U and V are not included as data was not applicable or analyzed as part of this evaluation.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.