# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

June 14, 2021

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Plus Bank, National Association Charter Number 24716

> 630 West Duarte Road Arcadia, CA 91007-9205

Office of the Comptroller of the Currency Los Angeles Field Office 550 North Brand Boulevard, Suite 500 Glendale, CA 91203-1985

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 community development test is rated: Satisfactory

The overall performance of American Plus Bank, National Association (American Plus or bank) reflects satisfactory responsiveness to community credit needs. The major factors that support this rating include:

- The Lending Test rating is based on the bank's satisfactory record of performance in meeting credit needs of its assessment area (AA).
  - The bank's loan-to-deposit ratio (LTD) is more than reasonable given the bank's size, financial condition, and business strategy.
  - The bank originated a majority of its loans inside its AA.
  - The geographic distribution of loans reflects excellent distribution throughout the bank's AA.
  - Lending activities represent reasonable distribution to individuals of different income levels and businesses of different sizes.
- The Community Development (CD) Test rating is based on the aggregate assessment of qualified CD loans, investments, and services.
  - The bank's CD activities demonstrate an adequate responsiveness to identified needs within the AA during the evaluation period.

#### Loan-to-Deposit Ratio

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

The OCC evaluated the bank's quarterly average LTD ratio for 12 quarters since the prior CRA examination through December 31, 2020. American Plus's quarterly average LTD ratio was 104.1 percent, with a high of 107.7 percent and a low of 99.8 percent. This compares favorably to four other banks of similar asset size and lending focus within the AA. The average LTD of the peer banks was 94.2 percent over the same period. The peer average ranged from a high of 99.7 percent to a low of 88.0 percent.

## **Lending in Assessment Area**

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

American Plus originated and purchased 51.0 percent of the number of loans and 75.0 percent of the total dollar volume inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. Refer to the table below:

	Le	nding I	nside an	d Outsid	e of the A	Assessmen	t Area				
Number of Loans Dollar Amount of Loan											
Loan Category	Insi	ide	Out	side	Total	Insi	de	Outs	Total \$(000s)		
	#	%	#	%	#	\$	%	\$ %			
Commercial Loans	10	50.0	10	50.0	20	29,755	65.9	15,412	34.1	45,167	
Home Mortgage	43	51.2	41	48.8	84	53,339	81.3	12,241	18.7	65,580	
Total	53	51.0	51	49.0	104	83,094	75.0	27,653	25.0	110,747	

Source: Commercial Loan Sample and HMDA Data

## **Description of Institution**

American Plus is an intrastate full-service community bank headquartered in Arcadia, California. It began operations in 2007 as a minority-owned institution. The bank is not a subsidiary of a holding company and has no affiliate relationships.

The bank operates three full-service branches. The main branch is located in Arcadia, California. The other two branches are located within Los Angeles County in Pasadena and Rowland Heights. All three locations are in upper-income census tracts.

The bank's primary strategy is providing personalized banking services to small and medium-sized businesses, business professionals, real estate developers/investors, and residents of Arcadia and surrounding communities in the western San Gabriel Valley market area. The bank offers traditional banking products but does not own or operate any automated teller machines and does not offer drive-up teller access. However, American Plus offers a variety of alternative banking services including online banking, bill pay, mobile banking, and mobile deposits.

As of December 31, 2020, American Plus Bank had total assets of \$587.5 million, total loans of \$502.4 million, total deposits of \$484.3 million, and total equity capital of \$89.4 million. Total loans represented approximately 85.5 percent of total assets. The following chart summarizes the loan portfolio by major product types:

Loan Portfolio	Summary
Loan Category	% of Outstanding Dollars
Commercial Real Estate	44.42
Construction & Land Development	15.71
Commercial & Industrial	15.52
1-4 Family Residential	15.22
Multifamily	7.52
Consumer	1.62
Total	100.0

Source: Uniform Bank Performance Report and Bank loan data

American Plus has held a Community Development Financial Institution (CDFI) certification from the U.S. Department of Treasury since 2015. As a CDFI, the bank promotes community development and revitalization in low- and moderate-income (LMI) areas by providing access to credit and other financial services. During the evaluation period, the bank received the maximum amount from the CDFI Bank Enterprise Award, including \$233,244 in 2018, \$245,547 in 2019, and \$202,898 in 2020. American Plus reinvested the entire award amounts by continuing to perform CDFI-related activities through originating loans to LMI borrowers and providing technical assistance to LMI individuals.

There are no financial or legal factors that would impede the bank's ability to meet the credit needs of the communities it serves. The bank received a "Satisfactory" rating under the intermediate small bank Community Reinvestment Act (CRA) procedures at their prior CRA examination dated April 4, 2018.

## **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

This performance evaluation (PE) assesses the CRA performance of American Plus using intermediate small bank examination procedures. The OCC performed a full-scope assessment of CRA performance in the bank's one identified assessment area of Los Angeles County. Refer to appendix A for detailed information.

The evaluation period for the lending test was January 1, 2018 through December 31, 2020. For the lending test the OCC determined the bank has two primary products: commercial loans and home mortgage loans. OCC examiners analyzed a random sample of 20 commercial loans the bank originated or purchased between January 1, 2018 and December 31, 2020. We also evaluated all home mortgage loans reported on the bank's Home Mortgage Disclosure Act Loan Application Register (HMDA LAR) from January 1, 2018 through December 31, 2020. Refer to table below.

<b>Loan Originations for Evaluation Period</b>	% of Dollar Amount of Loans	% of Number of Loans
Commercial Loans	64.3	40.0
Residential Real Estate Loans	32.8	24.6

Source: Loan originations for the evaluation period

For the CD test, examiners evaluated the bank's CD loans, investments, and services from April 4, 2018 through December 31, 2020. Our analysis of qualifying CD activities during 2020 included those performed in response to the significant impact the COVID-19 pandemic has had on economies across the United States. American Plus made 57 Paycheck Protection Program (PPP) Loans totaling \$4.9 million in 2020.

#### **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, the 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.

American Plus only has one AA, therefore all weighting of the evaluation is placed on the Los Angeles County 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 Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits excellent geographic distribution of home mortgage loans and small business loans throughout the bank's AA.
- Lending activities represent reasonable distribution to individuals of different income levels and businesses of different sizes.
- Aggregate CD activities reflect adequate responsiveness to identified community credit needs.

## **Description of Institution's Operations in California**

## Los Angeles County Assessment Area

American Plus designated Los Angeles County as its AA. Los Angeles County comprises the Los Angeles-Long Beach-Glendale Metropolitan Division (MD) and is part of the larger Los Angeles-Long Beach-Anaheim Metropolitan Statistical Area (MSA). Los Angeles County consists of 2,346 census tracts (CTs) surrounding the bank's three full-service branches located in Arcadia, Pasadena, and Rowland Heights. Of the 2,346 CTs, 221 are low-income, 674 are moderate-income, 583 are middle-income, and 817 are upper income. In addition, there are 51 CTs that do not report data and are listed as unknown. The AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income (LMI) geographies.

The Los Angeles County AA is the bank's primary market with 100 percent of the all bank deposits in the AA. Competition from larger financial institutions in the AA is strong. As of June 30, 2020, the Federal Deposit Insurance Corporation (FDIC) Market Share report included 98 financial institutions with a combined 1,698 branches competing for over \$522 billion in deposits. American Plus ranked 47th with \$470.1 million deposits, representing only 0.09 percent of the market share in the AA. The largest competitors include Bank of America, National Association (NA); Wells Fargo Bank, NA; and JPMorgan Chase Bank, NA, with a combined 43 percent of the deposit market in the AA. During the evaluation period, the bank's primary loan originations were commercial loans including PPP loans, and home mortgage loans.

Los Angeles County has a diverse economic base and an estimated population of over 10 million, making it one of most populous counties in the United States. The largest non-government employers include Kaiser Permanente, Walt Disney Company and NBC Universal. With a median housing value over \$495 thousand and median rent of \$1,292, there is a shortage of affordable housing. There are a large number of homeless people with over 66 thousand individuals experiencing homelessness on any given night. The AA has an estimated deficit of over 700,000 homes that are affordable to LMI households. In addition, there are 14.3 percent of families living below the poverty line in the AA.

Los Angeles County was especially sensitive to the impact of COVID-19. Over 93 percent of all Los Angeles businesses are small businesses with less than 20 employees. At the end of 2019, unemployment was 4.4 percent and the gross county product was over \$700 billion. By September of 2020, the COVID-19 pandemic devastated the Los Angeles economy resulting in a loss of 9.8 percent of its jobs. The 2020 annual average unemployment was 12.8 percent. The food services industry was particularly hard-hit with a loss of over 104,000 jobs. While there has been some improvement in area unemployment, over 500,000 jobs remain unrecovered.

To assess community needs, examiners reviewed information obtained from seven recent community contacts, demographic information from Table A below, and other economic data. The community contacts included a local housing organization, a Community Development Corporation (CDC), economic and community development organizations, and a local initiative organization. The contacts identified affordable housing and access to capital for vital neighborhood businesses as critical needs in the AA. Some opportunities to address the needs include:

- Assistance with grants, workforce development, volunteers for providing financial literacy, and a more streamlined mortgage application process.
- Bilingual credit counseling and community services to help attain housing.
- Increased technical assistance, contribute to programs centered around smaller loans.
- Micro loans for small businesses with favorable terms.
- Start-up loans for customers who cannot meet outside income criteria due to COVID-19.

Table A – Do	emographic l	nformatio	n of the Asses	sment Area		
Ass	sessment Are	a: Los Ang	geles MSA 202	20		
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 Hous	sing Value		\$495,540
			Median Gros	\$1,292		
			Families Belo	ow Poverty I	Level	14.3%

Source: 2015 ACS and 2020 D&B Data Due to rounding, totals may not equal 100.0%

## Scope of Evaluation in California

The CRA evaluation determines the bank's record of meeting community credit needs in the Los Angeles County AA. The OCC used a combination of bank and examiner generated loan and demographic reports to assess CRA performance. In addition, the OCC used information about the community and the bank's performance obtained during meetings with members of local community organizations. Examiners also considered the origination of a majority of loans inside the AA and the significant amount of market competition when evaluating overall performance.

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

The evaluation period for the lending test was January 1, 2018 through December 31, 2020. The analysis focused on the distribution of mortgage loans as one of the bank's primary lending product. OCC examiners compared the bank's distribution to demographic information as well as aggregate performance ratios which provided a comparison to peer banks.

We also reviewed a random sample of 20 commercial loans and compared the bank's distribution to demographic information as well as income distribution.

The evaluation period for the CD service test was April 4, 2018 through December 31, 2020. The OCC considered all qualified activities with an emphasis on those that addressed specific community needs or were particularly responsive to the COVID-19 pandemic.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

## **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 of the bank's sole AA, Los Angeles County, the bank's lending performance in the state of California is reasonable.

## Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of home mortgage loans and small business loans in the state.

#### Home 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 home mortgage loan originations and purchases.

The bank's distribution of mortgage loans within the AA shows excellent distribution in both low- and moderate-income geographies. During 2018-2020, the bank originated 43 mortgage loans inside the AA. Of those loans, 7.0 percent were located in low-income CTs. This distribution is significantly above the demographic owner-occupied housing of 2.4 percent and the aggregate lending of 2.8 percent. The bank's distribution of loans in moderate-income tracts is also significantly above the demographic and peer percentages. The bank originated 27.9 percent of its loans in moderate-income tracts compared to the demographic 17.2 percent and aggregate 17.5 percent.

#### 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.

The bank's distribution of small business loans with the AA shows overall excellent distribution, with excellent distribution in low-income geographies and excellent distribution in moderate-income geographies. The commercial loan sample included 20 small business loans in the AA. Of those loans, 10.0 percent were located in low-income CTs. This distribution is above the demographic low-income tract lending of 4.6 percent and the aggregate lending of 4.3 percent. The bank's distribution of loans in moderate-income tracts is also above the demographic and peer percentages. The bank originated 20.0 percent of its loans in moderate-income tracts compared to the demographic 18.9 percent and aggregate 19.2 percent.

## Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

### Home Mortgage Loans

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

Overall, the distribution of American Plus's home mortgage loans to LMI families reflects reasonable distribution in the Los Angeles County AA. Low aggregate lending percentages reflect the challenging mortgage lending opportunities in the AA for LMI families.

The bank originated 4.5 percent of home mortgage loans to low-income borrowers, representing excellent distribution in the AA. The demographic percentage of low-income families was 24.5 percent and aggregate peer data was 2.0 percent in the AA. The bank did not originate any home mortgage loans to moderate-income borrowers, reflecting very poor distribution. Demographics show 16.3 percent of moderate-income families and 5.2 percent of aggregate lending are in the AA. It is important to note that the high cost of housing in the AA makes it difficult for low-income families, which earn less than \$31,352, and moderate-income families, which earn less than \$50,162, to purchase and own a home in the AA, where the median home price, per Table A, is \$495,540.

In addition, 46.5 percent of loans did not have income available. The bank makes HMDA LAR reportable loans for multifamily housing, both purchases and refinances. The bank is not required to report income information on multifamily housing loans for HMDA LAR data purposes. As a result, we are unable to determine if these loans were made to LMI borrowers.

#### 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.

American Plus's distribution of small loans to businesses in the Los Angeles AA is excellent. The commercial loan sample included 20 small business loans in the AA. Of these loans, the bank originated 55.0 percent to businesses with revenues less than \$1 million, which is above the 51.2 percent aggregate percentage but less than the 89.7 percent demographic percentage. Examiners placed greater emphasis on performance to the aggregate as the demographic indicates that a number of businesses with revenues less than or equal to \$1 million may not seek out lending opportunities. In evaluating bank performance compared to the aggregate, we considered the significant competition in the market from much larger institutions.

## **Responses to Complaints**

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

#### COMMUNITY DEVELOPMENT TEST

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

## Conclusions for Area Receiving a Full-Scope Review

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.

#### **Number and Amount of Community Development Loans**

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans												
Assessment Area	Total											
Assessment Area	# Loans	% of Total #	\$(000's)	% of Total \$								
Los Angeles County AA	15	100.0	\$30,475	100.0								

During the evaluation period, the bank made 15 CD loans inside the AA totaling \$30.5 million. There were no CD loans originated outside of the AA. This represented 34.3 percent of tier 1 capital. A material portion of qualified loans were multifamily property mortgages with affordable rents for LMI families, which reflects outstanding responsiveness to a primary community need for affordable housing.

#### Additional CD loan examples include:

- Construction projects, namely hotels, to promote economic development and create jobs.
- Loans to small businesses to support job retention in LMI areas by providing PPP loans.
- Loan to develop vacant land into a medical building in order to serve LMI families.

### **Number and Amount of Qualified Investments**

			(	Qualified In	vestn	ents and Do	onations			
Assessment	H	Prior Period *		Current Period			Unfunded Commitments**			
Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Los Angeles County AA	5	\$7,071	18	\$15,191	23	100%	\$22,262	100%	5	\$2,387

(\*) 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.

American Plus demonstrated adequate responsiveness to CD investment opportunities in the AA. During the evaluation period, the bank made 18 investments and donations totaling \$15.2 million to qualified community development organizations in the AA. There were also five qualified prior period investments and donations totaling \$7.1 million. A majority of the dollar volume consisted of subordinated notes with other MDIs to promote economic and community development in underserved areas, or investments in equity fund targeting affordable housing for LMI families. The bank's \$90,000 in qualified donations to local CD organizations supported the following:

- Providing healthcare services to LMI individuals at risk due to financial situations and shortages of medical coverage.
- Crime prevention program funded exclusively by the banking industry for educating and safeguarding against elder abuse for those living in senior housing facilities.
- Providing high school students from a substantial majority LMI area with fundamental knowledge and skills in financial literacy to make intelligent economic choices.

## **Extent to Which the Bank Provides Community Development Services**

The bank's level of CD services reflects adequate level of responsiveness to identified needs within the AA. American Plus's qualified CD activities resulted in access to credit or services for LMI individuals or LMI geographies. The bank has three full-service branches readily available within the AA. There have been no openings or closures within the evaluation period. During the three-year evaluation period, the bank's employees provided 376 hours to six CD organizations. Highlights of qualified CD service activity provided by bank staff during the evaluation period include the following:

- American Plus participates in Junior Achievement of Southern California's Finance Park program for high school presentations to build a foundation for intelligent personal financial decisions, including real world issues related to income, saving and credit. The program is targeted to LMI individuals.
- American Plus's CEO contributed to the MDI Advisory Committee (MDIAC) to advise the OCC on issues and opportunities facing MDI through September 2019.
- American Plus's Chief Lending Officer participated on Pacific Coast Regional Small Business Development Corporation's Loan Committee from January 2018 to February 2020, to promote community development through financial and educational services to underserved small businesses.

## **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 MSA(s) and non-MSA(s) 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:	01/01/2018 to 12/31/2020									
Bank Products Reviewed:	Home mortgage and small bus Community development loan	siness loans as, qualified investments, and services								
Affiliate(s)	Affiliate Relationship	Products Reviewed								
N/A	N/A	N/A								
List of Assessment Areas and Type of Examination										
Rating and Assessment Areas	Type of Exam	Other Information								
MMSA(s)										
N/A										
California										
Los Angeles County	Full-Scope									

# **Appendix B: Summary of MMSA and State Ratings**

RATINO	GS Ame	rican Plus Bank,	N.A.
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
American Plus Bank, N.A.	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
California	Satisfactory	Satisfactory	Satisfactory

<sup>(\*)</sup> The Lending Test and Community Development Test carry equal weight in the overall rating.

# **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 arrogate 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 O:	Ass	essmen	t Area	Distribu	tion of H	Iome 1	Mortgage	Loans b	y Inc	ome Cate	gory of t	he Ge	ography						2018-20
	To	tal Home	Mortga	age Loans	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units	% Bank Loans	Aggregate
Los Angeles MSA	43	53,339	100.0	274,726	2.4	7.0	2.8	17.2	27.9	17.5	26.6	16.3	25.9	53.7	48.8	53.7	0.1	0.0	0.1
Total	43	53,339	100.0	274,726	2.4	7.0	2.8	17.2	27.9	17.5	26.6	16.3	25.9	53.7	48.8	53.7	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

	Total Home Mortgage Loans			age 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 MSA	43	53,339	100.0	274,726	24.5	4.5	2.0	16.3	-0-	5.2	16.7	9.5	13.5	42.4	46.5	61.3	0.0	46.5	18.1
Total	43	53,339	100.0	274,726	24.5	4.5	2.0	16.3	-0-	5.2	16.7	9.5	13.5	42.4	46.5	61.3	0.0	46.5	18.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table Q:	Ass	essmen	t Are	a Distrib	ution of I	Loans	to Small	Businesse	s by I	ncome Ca	ategory of	the G	eography	y				2	2018-20
	Total Loans to Small Businesses Low-Income				ncome '	Tracts	acts 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		% Bank Loans	Aggregate
Los Angeles MSA	20	51,015	13.9	368,190	4.6	10.0	4.3	18.9	20.0	19.2	21.2	15.0	22.0	52.8	55.0	52.5	2.4	0.0	1.9
Total	20	51,015	13.9	368,190	4.6	10.0	4.3	18.9	20.0	19.2	21.2	15.0	22.0	52.8	55.0	52.5	2.4	0.0	1.9

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 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 2018-2020							
	Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Los Angeles MSA	89.7	55.0	51.2	4.4	45.0	6.0	0.0
Total	89.7	55.0	51.2	4.4	45.0	6.0	0.0

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%