



## **PUBLIC DISCLOSURE**

June 22, 2015

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

El Dorado Savings Bank, F.S.B.  
Charter Number: **706164**

4040 El Dorado Road  
Placerville, CA 95667-8238

Office of the Comptroller of the Currency

One Front Street  
Suite 1000  
San Francisco, CA 94111

**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 **Outstanding**.

The following table indicates the performance level of El Dorado Savings Bank, F.S.B. with respect to the Lending, Investment, and Service Tests:

Performance Levels	El Dorado Savings Bank, F.S.B. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory		X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- El Dorado Savings Bank, F.S.B.’s (EDSB) lending activity, overall, reflects excellent responsiveness to community credit needs.
- EDSB granted a substantial majority of its HMDA and CRA reportable loans within the bank’s combined assessment areas. By number and by dollar volume, approximately 99 percent of all reportable loans were within the bank’s combined assessment areas.
- The geographic distribution of EDSB’s loans reflects good penetration.
- The distribution of EDSB’s loans by borrower income characteristics reflects excellent penetration.
- EDSB did not originate any community development loans. Given the bank’s business strategy and strong distribution of loans to low- and moderate-income borrowers, the bank’s community development lending has a neutral impact on the bank’s CRA performance.
- EDSB makes a significant level of qualified community development investments that are responsive to community needs.
- EDSB’s branch and alternative delivery systems are readily accessible to the bank’s geographies and individuals of different income levels. EDSB provides a limited level of community development services.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development.

Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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 do 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**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 MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated Area:** A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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) and the Thrift Financial Reporting (TFR) 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 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 One 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.

## Description of Institution

El Dorado Savings Bank, F.S.B. (EDSB) is a federally chartered stock savings bank headquartered in Placerville, California. EDSB maintains 32 full-service branches in California and three branches in Nevada. As of March 31, 2015, EDSB reported total assets of \$1.9 billion. Total loans, net of unearned income, equaled \$430.1 million, or 22 percent of total assets. The loan portfolio (by dollar volume) comprised 97 percent residential mortgages and 2 percent commercial. Tier one capital equaled \$192.6 million.

The bank primarily originates mortgage loans for the purchase, improvement, and refinance of owner-occupied one-to-four family dwellings. EDSB also grants small business, residential-secured small farm, and home equity loans. The concentration of one-to-four family mortgage loans warrants the emphasis on residential mortgage loans in the evaluation of the bank's CRA performance. EDSB does not sell the loans it originates. As a portfolio lender, EDSB has traditionally offered flexible and alternative underwriting standards to qualify creditworthy borrowers who do not meet traditional underwriting guidelines. In response to new mortgage underwriting rules implemented in 2014, EDSB has curtailed some of this flexibility.

At the beginning of this evaluation period, the communities that EDSB serves were still negatively impacted by the housing crisis, which impacted homebuyer opportunities. While economic and housing conditions have steadily improved through the end of this evaluation period, housing opportunities have only recently improved. EDSB's financial condition, size and location do not adversely affect the bank's ability to meet the credit needs of the community. There are no legal or regulatory impediments that prevent the bank from serving community credit needs.

EDSB's CRA performance was last evaluated in May 2011, at which time the bank was rated outstanding.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the Lending Test is from January 1, 2011 through December 31, 2014. EDSB offers home mortgage, commercial, agriculture, and limited consumer loans. Home mortgage lending is the primary loan product for purposes of this evaluation. Small business and small farm lending represent a very small proportion of the bank's reportable lending but demonstrates the bank's responsiveness to community credit needs.

For the Investment Test and Service Test, the evaluation period is from January 1, 2011 through June 22, 2015. The Investment Test included a review of investments and donations originated in EDSB's assessment areas (AAs) that meet the definition of community development (CD) investments. The Service Test included a review of retail and CD services provided in the bank's AAs. We also evaluated CD loans granted during this period.

### Data Integrity

We conducted a separate data integrity review prior to this evaluation. Overall, we found both the HMDA and CRA data reported in 2011, 2012, 2013, and 2014 to be accurate and reliable for the CRA evaluation. We found the bank's classification and documentation of community development investments to be sufficient to support the primary purpose of community development. However, we found the bank's documentation of community development loans and services to be insufficient for supporting community development purpose. We also reviewed all new community development activities engaged since the data integrity review.

### Selection of Areas for Full-Scope Review

EDSB operates in the states of California and Nevada. The bank maintains 32 branches serving two AAs in California and three branches serving two AAs in Nevada. Based on branches, deposits, and loan origination volumes, we selected both AAs in California and one AA in Nevada for full-scope reviews. The bank maintains deposit operations in the following MSAs or counties:

#### Full-Scope:

Sacramento AA or portion of the Sacramento-Roseville-Arden Arcade, CA MSA (40900) - El Dorado, Placer, and Sacramento Counties;

California Non-Metropolitan Statistical Area – Amador, Calaveras, Inyo, Nevada, and Tuolumne Counties; and

Nevada Non-Metropolitan Statistical Area - Douglas County

#### Limited-Scope:

Reno AA or portion of the Reno, NV MSA (39900) – Washoe County

## **Ratings**

EDSB's overall rating is a blend of the state ratings. Performance in California carries the most weight in the overall rating as 97 percent of EDSB's total reportable lending was made in California and 91 percent of total branches are located in California, housing 96 percent of total deposits. Based on branches, deposits, and loan origination volumes, performance in the Sacramento AA carries the most weight in the California State rating, with secondary weight placed on performance in the California Non-MSA AA. Performance in Douglas County (Nevada Non-MSA AA) carries the most weight in the Nevada State rating.

The state rating is based primarily on those areas that received full-scope reviews.

## **Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

## State Rating

### State of California

<b>CRA Rating for California<sup>1</sup>:</b>	<b>Outstanding</b>
<b>The lending test is rated:</b>	<b>Outstanding</b>
<b>The investment test is rated:</b>	<b>High Satisfactory</b>
<b>The service test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include:

- EDSB's lending activity, overall, reflects excellent responsiveness to community credit needs.
- The geographic distribution of EDSB's loans reflects good penetration.
- The distribution of EDSB's loans by borrower income characteristics reflects excellent penetration.
- EDSB did not originate any community development loans. Given the bank's business strategy and strong distribution of loans to low- and moderate-income borrowers, the bank's community development lending has a neutral impact on the bank's CRA performance.
- EDSB makes a significant level of qualified community development investments that are responsive to community needs.
- EDSB's branch and alternative delivery systems are readily accessible to the bank's geographies and individuals of different income levels. EDSB provides a limited level of community development services.

### Description of Institution's Operations in California

As of March 31, 2015, EDSB had 32 branch offices serving its California AAs. EDSB reported total deposits of nearly \$1.6 billion in these offices, which represented 96.0 percent of total deposits. The dollar volume of loans granted by EDSB within the state of California represented approximately 97.0 percent of the bank's total reportable lending. The branches are full-service, offering the full range of EDSB's loan and deposit products.

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<sup>1</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

## **Sacramento AA**

EDSB delineated a portion of the Sacramento-Roseville-Arden Arcade MSA as its AA. EDSB maintains 20 branches in El Dorado, Placer, and Sacramento counties, and designated the whole of each county as its Sacramento AA. Branches in the AA represent 57 percent of total branches, deposits represent 64 percent of total deposits, and reportable lending represents 64 of total reportable lending.

In the Sacramento AA, as of June 30, 2014, the top deposit competitors were Wells Fargo, US Bank, Bank of America, JP Morgan Chase, and Citibank with combined deposit market share of 68 percent. EDSB ranks ninth out of 41 depository financial institutions with branches in the AA with a deposit market share of less than 3 percent. The top mortgage lenders in 2013, most recent data available, were Wells Fargo, JP Morgan Chase, and Bank of America with a combined HMDA loan market share of 31 percent. EDSB ranks 40 out of 591 HMDA reporters with a market share of 0.49 percent.

## **California Non-MSA AA**

EDSB maintains 12 branches in Amador, Calaveras, Inyo, Nevada, and Tuolumne counties. These counties are not part of any MSAs. EDSB designated the whole counties in which it maintained at least one branch as its California Non-MSA AA. Branches in the AA represent 34 percent of total branches, deposits represent 32 percent of total deposits, and reportable lending represents 34 of total reportable lending.

In the California Non-MSA AA, as of June 30, 2014, the top deposit competitors were Wells Fargo and Bank of America with combined deposit market share of 36 percent. EDSB ranks third out of 20 depository financial institutions with branches in the AA with deposit market share of 13 percent. The top mortgage lenders in 2013, most recent data available, were Wells Fargo, Bank of America, and JP Morgan Chase with a combined HMDA loan market share of 31 percent. EDSB ranks 11 out of 395 HMDA reporters with a market share of nearly 2 percent.

Refer to the market profiles for the state of California in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## **Scope of Evaluation in California**

EDSB's serves two AAs in California. Both AAs were selected for full-scope reviews based on loan and deposit volumes. Based on branches, deposits, and loan origination volumes, performance in the Sacramento AA carries the most weight in the California State rating, with secondary weight placed on performance in California Non-MSA AA.

## LENDING TEST

The bank’s performance under the lending test in California is rated outstanding. Based on full-scope reviews, the bank’s performance in the Sacramento AA and the California Non-MSA AA is excellent.

### Lending Activity

Refer to Tables 1. Lending Volume and 1. Other Products in the state of California section of appendix D for the facts and data used to evaluate the bank’s lending activity.

Lending levels reflect excellent responsiveness in relation to area credit needs and EDSB’s deposit market share percentile ranking.

#### Sacramento AA

Lending levels in the Sacramento AA reflect excellent responsiveness. EDSB has a deposit market share of 2.7 percent, which ranks ninth amongst 41 depository institutions operating in the AA as of June 30, 2014. Based on 2013 peer lending data, there are significantly more mortgage lenders and twice as many small business lenders in the Sacramento AA than depository financial institutions with branches in the AA. As such, the bank’s lending market share is much lower than its deposit market share for all loan products. Despite its low lending market share relative to deposit market share, the bank’s market percentile rank by mortgage loan product exceeds its deposit market share percentile rank. The volume of small business and small farm lending is too low to measure statistically.

#### Sacramento AA

<b>Product</b>	<b>Number of Loans</b>	<b>Percent of All Loan Products</b>	<b>2013 Market Share</b>	<b>Market Share Rank</b>	<b>Market Share Percentile</b>
<b>Deposits *</b>			2.7	9 of 41	78
<b>Home Refinance</b>	1,034	68.1	0.5	35 of 510	93
<b>Home Purchase</b>	163	10.7	0.2	75 of 429	83
<b>Home Improvement</b>	294	19.4	4.2	4 of 145	97
<b>Small Business</b>	14	0.9	0.01	68 of 96	29
<b>Small Farm</b>	13	0.9	1.3	14 of 24	42

\* Source: FDIC June 30, 2014 Deposit Market Share

California Non-MSA AA

Lending levels in the California Non-MSA AA reflect excellent responsiveness. EDSB has a deposit market share of 13.5 percent, which ranks third amongst 20 depository institutions operating in the AA as of June 30, 2014. Based on 2013 peer lending data, there are significantly more mortgage lenders and twice as many small business lenders in the California Non-MSA AA than depository financial institutions with branches in the AA. As such, the bank's lending market share is much lower than its deposit market share for all loan products. Despite its low lending market share relative to deposit market share, the bank's market percentile rank by mortgage loan product exceeds its deposit market share percentile rank. The volume of small business and small farm lending is too low to measure statistically.

**California Non-MSA AA**

<b>Product</b>	<b>Number of Loans</b>	<b>Percent of All Loan Products</b>	<b>2013 Market Share</b>	<b>Market Share Rank</b>	<b>Market Share Percentile</b>
<b>Deposits *</b>			13.5	3 of 20	85
<b>Home Refinance</b>	499	62.3	1.7	12 of 326	96
<b>Home Purchase</b>	104	13.0	0.8	29 of 254	89
<b>Home Improvement</b>	177	22.1	18.6	2 of 66	97
<b>Small Business</b>	9	1.1	0.0	0 of 53	0
<b>Small Farm</b>	12	1.5	5.7	4 of 16	75

\* Source: FDIC June 30, 2014 Deposit Market Share

## **Distribution of Loans by Income Level of the Geography**

Overall geographic distribution of loans in the State of California is good. Home refinance lending is good, while home purchase and home improvement lending is adequate. The volume of both small business and small farm lending is too low to derive statistically valid conclusions. In California, home refinance lending represents 66 percent of EDSB's total reportable lending, home improvement lending represents 20 percent of reportable lending, home purchase represents 12 percent of reportable lending, and small business and small farm lending, each, represent 1 percent of reportable lending. As such, home refinance lending carries the most weight under this performance criterion and home improvement carries secondary weighting.

### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4, and 5 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/purchases.

Geographic distribution of home mortgage loans is good. Home refinance lending is good and home purchase and home improvement lending is adequate. Home refinance lending represents 68 percent of EDSB's home mortgage lending in California. Home purchase lending represents 11 percent of home mortgage lending, and home improvement lending represents 21 percent of mortgage lending in California.

### **Sacramento AA**

Geographic distribution of home mortgage loans in the Sacramento AA is adequate. Home refinance lending is adequate, home purchase lending is poor, and home improvement lending is very poor. Home refinance lending represents the majority (69 percent) of EDSB's home mortgage lending in the Sacramento AA and 68 percent of its total reportable lending in the AA. Home refinance, therefore, carries the most weight of EDSB's home mortgage lending.

### **Home Refinance**

Geographic distribution of EDSB's home refinance lending in the Sacramento AA is adequate. EDSB's percentage of 2012-2014 lending for home refinance is well below the percentage of owner-occupied housing units in low-income census tracts as of the 2010 Census and compares poorly to the 2013 HMDA Peer Aggregate. EDSB's home refinance lending in low-income census tracts was also poor in 2011. EDSB's percentage of 2012-2014 lending for home refinance is below the percentage of owner-occupied housing units in moderate-income census tracts as of the 2010 Census, and near to the percentage of moderate-income census tract lending of the 2013 HMDA Peer Aggregate. EDSB's 2011 lending in moderate-income census tracts compares poorly to the demographic data but well against the 2011 HMDA Peer Aggregate. In 2013, EDSB's market share of home refinance loans in low-income

census tracts was below its overall home refinance market share and its market share of lending in moderate-income census tracts was near its overall market share.

### Home Purchase

Geographic distribution of EDSB's home purchase lending in the Sacramento AA is poor. The percentage of EDSB's 2012-2014 lending for home purchase is well below the percentage of owner-occupied housing units in low- and moderate-income census tracts as of the 2010 Census. EDSB's home purchase lending also compared poorly to 2013 HMDA Peer Aggregate. EDSB's home purchase lending in low-income census tracts in 2011 was poor, while lending in moderate-income census tracts was adequate. In 2013, EDSB's market share of home purchase loans in low- and moderate-income census tracts was well below its overall home purchase market share.

### Home Improvement

Geographic distribution of EDSB's home improvement lending in the Sacramento AA is very poor. EDSB's percentage of 2012-2014 lending for home improvement is well below the percentage of owner-occupied housing units in low- and moderate-income census tracts as of the 2010 Census. EDSB's percentage of 2012-2014 lending also compares poorly to the 2013 HMDA Peer Aggregate. EDSB's 2011 home improvement lending in low-income census tracts was also poor but lending in moderate-income census tracts was adequate. In 2013, EDSB's market share of home improvement loans in low- and moderate-income census tracts is well below its overall home improvement market share.

### **California Non-MSA AA**

Geographic distribution of home mortgage loans in the California Non-MSA AA is excellent. Home mortgage lending by all mortgage products is excellent. Home refinance lending represents the majority (64 percent) of EDSB's home mortgage lending in the California Non-MSA AA and 62 percent of its total reportable lending in the AA. For home mortgage lending, home refinance loans carry the most weight of its home mortgage lending.

### Home Refinance

Geographic distribution of EDSB's home refinance lending in the California Non-MSA AA is excellent. EDSB's percentage of 2012-2014 lending for home refinance exceeds the percentage of owner-occupied housing units in moderate-income census tracts as of the 2010 Census. EDSB's percentage of 2012-2014 lending for home refinance also exceeds the 2013 HMDA Peer Aggregate's percentage of loans in moderate-income census tracts. There were no low-income census tracts in the AA. EDSB's 2011 lending in moderate-income census tracts is also strong. In 2013, EDSB's market share of home refinance loans in moderate-income census tracts exceeds its overall home refinance market share.

Home Purchase

Geographic distribution of EDSB's home purchase lending in the California Non-MSA AA is excellent. The percentage of EDSB's 2012-2014 lending for home purchase exceeds the percentage of owner-occupied housing units in moderate-income census tracts as of the 2010 Census. EDSB's home purchase lending in moderate-income census tracts compares well to the 2013 HMDA Peer Aggregate. There are no low-income census tracts in the AA. The percentage of EDSB's 2011 lending for home purchase also exceeded the percentage of owner-occupied housing units in moderate-income census tracts as of the 2000 Census. EDSB's market share of home purchase loans within moderate-income census tracts in 2013 exceeds its overall market share.

Home Improvement

Geographic distribution of EDSB's home improvement lending in the California Non-MSA AA is excellent. EDSB's percentage of 2012-2014 lending for home improvement exceeds the percentage of owner-occupied housing units in moderate-income census tracts as of the 2010 Census. EDSB's percentage of 2012-2014 lending in moderate-income census tracts also compares well to the 2013 HMDA Peer Aggregate. There were no low-income census tracts in the AA. EDSB did not grant any home improvement loans in moderate-income census tracts in 2011; however, only three home improvement loans were granted in moderate-income census tracts by any lender in 2011. EDSB's market share of home improvement loans in moderate-income census tracts in 2013 exceeds its overall home improvement market share.

***Small Loans to Businesses***

Refer to Table 6 in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Volume of small business loans is too low to derive statistically valid conclusions. Between January 1, 2011 and December 31, 2014, EDSB originated 14 small business loans in the Sacramento AA and nine loans in the California Non-MSA AA.

***Small Loans to Farms***

Refer to Table 7 in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Volume of small farm loans is too low to derive statistically valid conclusions. Between January 1, 2011 and December 31, 2014, EDSB originated 13 small farm loans in the Sacramento AA and 12 loans in the California Non-MSA AA.

***Lending Gap Analysis***

Data detailing EDSB’s lending activity over the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified.

***Inside/Outside Ratio***

We performed an analysis of the inside/outside ratio at the bank level. Information includes the bank’s reportable loan originations and purchases only.

Lending levels in EDSB’s AAs reflect excellent responsiveness to area credit needs. A substantial majority of loans are made in EDSB’s AAs. For all reportable lending combined, EDSB originated 99 percent by number and by dollar within its four AAs. The table below illustrates the bank’s lending inside and outside of its AAs by reportable loan product.

<b>El Dorado Savings Bank Combined Lending Assessment Areas</b>										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Small Business	23	100%	0	0%	23	4,761	100%	0	0%	4,761
Small Farm	26	100%	0	0%	26	5,951	100%	0	0%	5,951
HMDA	2,335	99%	26	1%	2,361	360,417	99%	3,160	1%	363,577
<b>Totals</b>	<b>2,384</b>	<b>99%</b>	<b>26</b>	<b>1%</b>	<b>2,410</b>	<b>371,129</b>	<b>99%</b>	<b>3,160</b>	<b>1%</b>	<b>374,289</b>

**Distribution of Loans by Income Level of the Borrower**

Overall distribution of loans by borrower income in the State of California is excellent. Home mortgage lending by each product is excellent. Volume of both small business and small farm lending is too low to derive statistically valid conclusions. In California, home refinance lending represents 66 percent of EDSB’s total reportable lending, home improvement lending represents 20 percent of reportable lending, home purchase represents 12 percent of reportable lending, and small business and small farm lending, each, represent 1 percent of reportable lending. As such, home refinance lending carries the most weight under this performance criterion and home improvement carries secondary weighting.

***Home Mortgage Loans***

Refer to Tables 8, 9 and 10 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.

Distribution of home mortgage loans by borrower income characteristics is excellent. Home refinance, home purchase, and home improvement lending are excellent. Home refinance lending represents 68

percent of EDSB's home mortgage lending in California. Home purchase lending represents 11 percent of home mortgage lending and home improvement lending represents 21 percent of mortgage lending in California.

## **Sacramento AA**

Distribution of home mortgage loans by borrower income characteristics in the Sacramento AA is excellent. Home mortgage lending is excellent for each mortgage product. Home refinance lending represents the majority (69 percent) of EDSB's home mortgage lending in the Sacramento and 68 percent of its total reportable lending in the AA. Home refinance, therefore, carries the most weight of EDSB's home mortgage lending.

### Home Refinance

Distribution of EDSB's home refinance lending by borrower income characteristics in the Sacramento AA is excellent. EDSB's percentage of 2012-2014 lending for home refinance is well below the percentage of low-income families as of the 2010 Census but well exceeds the 2013 HMDA Peer Aggregate. EDSB's home refinance lending to low-income borrowers was excellent in 2011. EDSB's percentage of 2012-2014 lending for home refinance exceeds the percentage of moderate-income families as of the 2010 Census and exceeds the percentage of moderate-income borrower lending of the 2013 HMDA Peer Aggregate. EDSB's 2011 lending to moderate-income borrowers compares well against both the demographic data and the 2011 HMDA Peer Aggregate. In 2013, EDSB's market share of home refinance loans to both low- and moderate-income borrowers exceeds its overall home refinance market share.

### Home Purchase

Distribution of EDSB's home purchase lending by borrower income characteristics in the Sacramento AA is excellent given its strong lending to low-income borrowers. EDSB's percentage of 2012-2014 lending for home purchase is somewhat below the percentage of low-income families as of the 2010 Census but exceeds such lending of the 2013 HMDA Peer Aggregate. EDSB's home purchase lending to low-income borrowers was good in 2011. EDSB's percentage of 2012-2014 lending for home purchase is below the percentage of moderate-income families as of the 2010 Census and below percentage of moderate-income borrower lending of the 2013 HMDA Peer Aggregate. EDSB's 2011 lending to moderate-income borrowers was good. In 2013, EDSB's market share of home purchase loans to low-income borrowers exceeds its overall home refinance market share and its market share of lending to moderate-income borrowers well below its overall market share.

### Home Improvement

Distribution of EDSB's home improvement lending by borrower income characteristics in the Sacramento AA is excellent. EDSB's percentage of 2012-2014 lending for home improvement is

somewhat below the percentage of low-income families as of the 2010 Census but well exceeds such lending of the 2013 HMDA Peer Aggregate. EDSB's percentage of 2012-2014 lending for home improvement exceeds both the percentage of moderate-income families as of the 2010 Census and such lending of the 2013 HMDA Peer Aggregate. EDSB's 2011 home improvement lending to both low- and moderate-income borrowers was also strong. In 2013, EDSB's market share of home improvement loans to both low- and moderate-income borrowers exceeds its overall home improvement market share.

### **California Non-MSA AA**

Distribution of home mortgage loans by borrower income characteristics in the California Non-MSA AA is excellent. Home mortgage lending by all mortgage products is excellent. Home refinance lending represents the majority (64 percent) of EDSB's home mortgage lending in the AA and 62 percent of its total reportable lending in the AA. For home mortgage lending, home refinance loans carry the most weight of its home mortgage lending.

#### Home Refinance

Distribution of EDSB's home refinance lending by borrower income characteristics in the California Non-MSA AA is excellent. EDSB's percentage of 2012-2014 lending for home refinance is well below the percentage of low-income families as of the 2010 Census but exceeds the 2013 HMDA Peer Aggregate. EDSB's home refinance lending to low-income borrowers was excellent in 2011. EDSB's percentage of 2012-2014 lending for home refinance exceeds both the percentage of moderate-income families as of the 2010 Census and the percentage of moderate-income borrower lending of the 2013 HMDA Peer Aggregate. EDSB's 2011 lending to moderate-income borrowers was also excellent. In 2013, EDSB's market share of home refinance loans to both low- and moderate-income borrowers exceeds its overall home refinance market share.

#### Home Purchase

Distribution of EDSB's home purchase lending by borrower income characteristics in the California Non-MSA AA is excellent. EDSB's percentage of 2012-2014 lending for home purchase is below the percentage of low-income families as of the 2010 Census but well exceeds such lending of the 2013 HMDA Peer Aggregate. EDSB did not grant any home purchase loans to low-income borrowers in 2011. EDSB's percentage of 2012-2014 lending for home purchase exceeds the percentage of moderate-income families as of the 2010 Census and exceeds the percentage of moderate-income borrower lending of the 2013 HMDA Peer Aggregate. EDSB's 2011 lending to moderate-income borrowers was excellent. In 2013, EDSB's market share of home purchase loans to both low- and moderate-income borrowers exceeds its overall home refinance market share.

Home Improvement

Distribution of EDSB's home improvement lending by borrower income characteristics in the California Non-MSA AA is excellent. EDSB's percentage of 2012-2014 lending for home improvement is somewhat below the percentage of low-income families as of the 2010 Census but well exceeds such lending of the 2013 HMDA Peer Aggregate. EDSB's percentage of 2012-2014 lending for home improvement exceeds both the percentage of moderate-income families as of the 2010 Census and such lending of the 2013 HMDA Peer Aggregate. EDSB's 2011 home improvement lending to both low- and moderate-income borrowers was also strong. In 2013, EDSB's market share of home improvement loans to both low- and moderate-income borrowers exceeds its overall home improvement market share.

*Small Loans to Businesses*

Refer to Table 11 in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Volume of small business loans is too low to derive statistically valid conclusions.

*Small Loans to Farms*

Refer to Table 12 in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Volume of small business loans is too low to derive statistically valid conclusions.

**Community Development Lending**

Refer to Table 1 Lending Volume in the state of California section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

EDSB did not originate any CD loans during the evaluation period. While the bank offers commercial and agriculture loans that may also have a community development purpose, EDSB rarely makes loans in excess of \$1.0 million for commercial or agricultural purposes. EDSB's business and farm lending is in the form of smaller dollar loans and serve a different credit need. Small business or small farm loans of less than \$1.0 million must analyzed under the Borrower and Geographic Distribution components of the lending test and cannot be considered under the CD Lending component.

EDSB's retail lending activity, however, is strong and mitigates the bank's lack of CD lending.

## **Product Innovation and Flexibility**

EDSB is a portfolio lender, which allows the bank to underwrite loans for otherwise creditworthy borrowers that wouldn't qualify under secondary market investor guidelines. The new mortgage rules have had some negative impact on the bank's flexibility and loan volume, but the bank expects to continue to offer alternative underwriting standards.

EDSB's loan restructuring and modification activity offers temporary relief to borrowers that will allow some borrowers to stay in their home for the long-term while they weather financial setbacks. This activity is responsive.

## **INVESTMENT TEST**

The bank's performance under the investment test in California is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Sacramento AA and California Non-MSA AA is good.

EDSB makes a significant level of qualified CD investments and grants, particularly those not routinely provided by private investors, rarely in a leadership position. EDSB makes significant use of innovative and/or complex investments to support CD initiatives and exhibits good responsiveness to credit and CD needs. During the evaluation period, qualified investments and donations totaled \$6.5 million, which represents 3.52 percent of EDSB's tier one capital.

Refer to Table 14 in the state of California section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **Statewide Regional**

EDSB has outstanding investments in WNC Institutional Tax Credit funds and Community Capital Trust CRA Qualified Investment Fund totaling \$6.3 million and has \$685 thousand in unfunded commitments in these funds. Each fund is a statewide investment vehicle benefiting California communities, including EDSB AAs. EDSB also donated \$13 thousand to community development organizations serving both California AAs.

During this evaluation period, EDSB committed to invest \$4.0 million in four WNC Capital Corporation funds. EDSB made capital contributions of \$3.3 million and is committed to advance \$685 thousand in future capital calls. The Sacramento AA directly benefits from one of these funds and CA Non-MSA AA directly benefits from three of these funds. WNC Capital Corporation is the wholly owned subsidiary of WNC & Associates, Inc. and offers tax credit investments to corporations through a national network of stockbrokers and financial advisors. WNC & Associates, Inc., is an affordable housing investment corporation that has business lines spanning affordable housing, Federal Low-Income Housing Tax Credits, New Market Tax Credits, Historic Tax Credits, and State Tax Credits.

In prior periods, EDSB committed to invest \$6.0 million in five WNC Capital Corporation funds and a Community Capital Trust CRA Qualified Investment Fund, to which the bank advanced periodic capital contributions, including contributions during this evaluation period. During the evaluation period, EDSB advanced \$449 thousand to these funds and the outstanding book value of prior period contributions to these funds totaled \$2.6 million.

### **Sacramento AA**

EDSB made grants totaling \$156 thousand to 33 community development organizations in the Sacramento AA. These organizations primarily provide services to low- and moderate-income individuals with a few providing affordable housing for low- and moderate-income individuals.

### **CA Non-MSA AA**

EDSB made grants totaling \$31 thousand to six community development organizations in the CA Non-MSA AA. These organizations provide affordable housing or services to low- and moderate-income individuals or promote revitalization or economic development.

## **SERVICE TEST**

The bank's performance under the service test in California is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Sacramento AA and CA Non-MSA AA is good.

### **Retail Banking Services**

Refer to Table 15 in the state of California section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

EDSB's delivery systems are readily accessible to geographies and individuals of different income levels. EDSB's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. EDSB provides an adequate level of CD services.

### ***Alternative Delivery Systems***

EDSB's delivery systems, including alternative delivery systems, are good. EDSB's delivery systems include 32 full service branches with automated teller machines (ATM); telephone banking; and online banking. Alternative delivery systems are reasonably accessible to all segments of the bank's AAs. In addition, EDSB offers VISA debit cards and participates in the STAR, INTERLINK, and Cirrus networks for point of sale transactions and access to millions of ATMs worldwide.

### ***Reasonableness of Services and Hours of Operations***

EDSB offers traditional savings and deposit products and provides money orders, travelers checks, and safe deposit boxes. EDSB offers low-cost and low-minimum balance checking and savings accounts that are accessible to low- and moderate-income customers, seniors, and custodial accounts for minors.

EDSB branch hours are universal among all the branches each weekday, with Saturday hours available at several locations. Branch services and hours do not vary in a way that inconveniences portions of the AAs, particularly LMI individuals or geographies. The bank's retail banking services are further discussed by AA below.

### ***Branch Network***

#### **Sacramento AA**

##### *Distribution of Branches*

EDSB's distribution of branches is good and readily accessible to geographies and individuals of different income levels. While EDSB does not maintain any branches in low-income census tracts, the proportion of AA branches in moderate-income geographies exceeds the percentage of the population in these tracts. EDSB operates 20 branch offices in the AA.

##### *Record of Opening and Closing Branches*

EDSB did not open or close any branches in the AA.

##### *Branch Hours and Services*

Branch lobby hours are Monday-Thursday 9AM-5PM and Friday 9AM-6PM. Each branch maintains an ATM. Ten branches maintain Saturday hours of 9AM-1PM, including two moderate-income branches. Six branches have drive-up/walk-up hours. Business hours and services are reasonable and do not vary in a way that inconveniences any portion of the bank's assessment areas or any group of individuals.

#### **California Non-MSA AA**

##### *Distribution of Branches*

EDSB's distribution of branches is excellent and readily accessible to geographies and individuals of different income levels. The proportion of AA branches in moderate-income geographies well exceeds the percentage of the population in these tracts. In addition, two branches are located in distressed or underserved middle-income census tracts. There are no low-income census tracts in the AA. EDSB operates 12 branch offices in the AA.

##### *Record of Opening and Closing Branches*

EDSB did not open or close any branches in the AA.

*Branch Hours and Services*

Branch lobby hours are Monday-Thursday 9AM-5PM and Friday 9AM-6PM. Each branch maintains an ATM. Three branches maintain Saturday hours of 9AM-1PM, including one of the branches in a distressed or underserved area. Four branches have drive-up/walk-up hours. Business hours and services are reasonable and do not vary in a way that inconveniences any portion of the bank's assessment areas or any group of individuals.

**Community Development Services**

A community development (CD) service is defined by the CRA regulation as a financial-related service targeted to low- and moderate-income individuals or other activities that serve to promote economic development for small businesses and small farms or to revitalize or stabilize underserved or distressed geographies.

EDSB provides an adequate level of CD services that benefit organizations within the AAs during the evaluation period. Two staff members served as Board Members or committee members of two community development organizations focusing on economic development. Staff provided 252 technical assistance service hours to two organizations serving both California AAs during the evaluation period.

**State Rating**

**State of Nevada**

<b>CRA Rating for Nevada<sup>2</sup>:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>Needs to Improve</b>
<b>The service test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include:

- EDSB’s lending activity, overall, reflects good responsiveness to community credit needs.
- The geographic distribution of EDSB’s loans reflects good penetration.
- The distribution of EDSB’s loans by borrower income characteristics reflects excellent penetration.
- EDSB did not originate any community development loans. Given the bank’s business strategy and strong distribution of loans to low- and moderate-income borrowers, the bank’s community development lending has a neutral impact on the bank’s CRA performance.
- EDSB makes a limited level of qualified community development investments that are responsive to community needs.
- EDSB’s branch and alternative delivery systems are readily accessible to the bank’s geographies and individuals of different income levels. EDSB provides a limited level of community development services.

**Description of Institution’s Operations in Nevada**

As of March 31, 2015, EDSB had three branch offices serving its Nevada AAs. EDSB reported total deposits of nearly \$65.0 million in these offices, which represented 4.0 percent of total deposits. The dollar volume of loans granted by EDSB within the state of Nevada represented approximately 3.0 percent of the bank’s total reportable lending. The branches are full-service, offering the full range of EDSB’s loan and deposit products.

**Nevada Non-MSA AA**

EDSB maintains two branches in Douglas County. Douglas County is not part of any MSAs. EDSB designated the whole county in which it maintained at least one branch as its Nevada Non-MSA AA.

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<sup>2</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution’s performance in that area.

Branches in the AA represent 6 percent of total branches, deposits represent 3 percent of total deposits, and reportable lending represents 2 percent of total reportable lending.

In the NV Non-MSA AA, as of June 30, 2014, the top deposit competitors were Wells Fargo, Bank of America, and US Bank with combined deposit market share of 78 percent. EDSB ranks fourth out of seven depository financial institutions with branches in the AA with deposit market share of 6 percent. The top mortgage lenders in 2013, most recent data available, were Wells Fargo, Guild Mortgage Company, and JP Morgan Chase with a combined HMDA loan market share of 34 percent. EDSB ranks 22 out of 159 HMDA reporters with a market share of nearly 0.6 percent.

Refer to the market profiles for the state of Nevada in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## **Scope of Evaluation in Nevada**

EDSB's serves two AAs in Nevada. We selected the NV Non-MSA AA for full-scope review based on branches, deposits, and loan origination volumes. Performance in the NV Non-MSA AA carries the most weight in the Nevada State rating, with performance in the Reno AA contributing very little weight.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test in Nevada is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Nevada Non-MSA is good.

### **Lending Activity**

Refer to Tables 1. Lending Volume and 1. Other Products in the state of Nevada section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect good responsiveness in relation to area credit needs and EDSB's deposit market share percentile ranking.

### **Douglas County, NV**

Despite relatively low loan volume, lending levels in the Douglas County AA reflect good responsiveness given the level of competition and strong lending market share percentile rank. EDSB has a deposit market share of 6.3 percent, which ranks fourth amongst seven depository institutions operating in the AA as of June 30, 2014. Based on 2013 peer lending data, there are significantly more mortgage and small business lenders in the Douglas County AA than depository financial institutions with branches in the AA. As such, the bank's lending market share for its primary loan product in the

AA is much lower than its deposit market share. Despite its low lending market share relative to deposit market share, the bank's market percentile rank of home refinance lending exceeds its deposit market share percentile rank. The volume of home purchase, home improvement, small business, and small farm lending is too low to measure statistically.

#### **Douglas County AA**

<b>Product</b>	<b>Number of Loans</b>	<b>Percent of All Loan Products</b>	<b>2013 Market Share</b>	<b>Market Share Rank</b>	<b>Market Share Percentile</b>
<b>Deposits *</b>			6.3	4 of 7	43
<b>Home Refinance</b>	33	75.0	0.8	18 of 128	86
<b>Home Purchase</b>	7	15.9	0.2	43 of 92	53
<b>Home Improvement</b>	3	6.8	0.0	0 of 43	0
<b>Small Business</b>	0	0.0	0.0	0 of 28	0
<b>Small Farm</b>	1	2.3	8.3	2 of 4	50

\* Source: FDIC June 30, 2014 Deposit Market Share

### **Distribution of Loans by Income Level of the Geography**

Overall geographic distribution of loans in the State of Nevada is good. Home refinance lending is good. The volume of home purchase, home improvement, small business, and small farm lending is too low to derive statistically valid conclusions. In Nevada, home refinance lending represents 82 percent of EDSB's total reportable lending, home purchase represents 12 percent of reportable lending, home improvement lending represents 5 percent of reportable lending, and small farm lending represents 1 percent of reportable lending. EDSB did not grant any small business loans in Nevada. As such, home refinance lending carries the most weight under this performance criterion. Performance conclusions are based on performance in the full-scope AA.

#### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4, and 5 in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Geographic distribution of home mortgage loans is good. Geographic distribution of EDSB's home refinance lending in the Nevada Non-MSA AA is good. EDSB's percentage of 2012-2014 lending for home refinance is slightly below the percentage of owner-occupied housing units in moderate-income census tracts as of the 2010 Census. EDSB's percentage of 2012-2014 lending for home refinance exceeds the 2013 HMDA Peer Aggregate's percentage of loans in moderate-income census tracts. There were no low-income census tracts in the AA. EDSB's 2011 home refinance lending volume was too low to analyze. In 2013, EDSB's market share of home refinance loans in moderate-income census tracts exceeds its overall home refinance market share.

***Small Loans to Businesses***

Refer to Table 6 in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to businesses.

EDSB did not originate any small business loans in the Nevada Non-MSA AA.

***Small Loans to Farms***

Refer to Table 7 in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to farms.

The volume of small farm lending is too low to make statistically valid conclusions. EDSB originated one small farm loan in the Nevada Non-MSA AA.

***Lending Gap Analysis***

Data detailing EDSB’s lending activity over the evaluation period for home mortgage loans, small loans to businesses, and small loans to farms were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified.

***Inside/Outside Ratio***

We performed an analysis of the inside/outside ratio at the bank level. Information includes the bank’s reportable loan originations and purchases only.

Lending levels in EDSB’s AAs reflect excellent responsiveness to area credit needs. A substantial majority of loans are made in EDSB’s AAs. For all reportable lending combined, EDSB originated 99 percent by number and by dollar within its four AAs. The table below illustrates the bank’s lending inside and outside of its AAs by reportable loan product.

<b>El Dorado Savings Bank Combined Lending Assessment Areas</b>										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Small Business	23	100%	0	0%	23	4,761	100%	0	0%	4,761
Small Farm	26	100%	0	0%	26	5,951	100%	0	0%	5,951
HMDA	2,335	99%	26	1%	2,361	360,417	99%	3,160	1%	363,577
<b>Totals</b>	<b>2,384</b>	<b>99%</b>	<b>26</b>	<b>1%</b>	<b>2,410</b>	<b>371,129</b>	<b>99%</b>	<b>3,160</b>	<b>1%</b>	<b>374,289</b>

## **Distribution of Loans by Income Level of the Borrower**

Overall distribution of loans by borrower income characteristics in the State of Nevada is excellent. Home refinance lending is excellent. Volume of home purchase, home improvement, small business, and small farm lending is too low to derive statistically valid conclusions. In Nevada, home refinance lending represents 82 percent of EDSB's total reportable lending, home purchase represents 12 percent of reportable lending, home improvement lending represents 5 percent of reportable lending, and small farm lending represents 1 percent of reportable lending. EDSB did not grant any small business loans in Nevada. As such, home refinance lending carries the most weight under this performance criterion. Performance conclusions are based on performance in the full-scope AA.

### ***Home Mortgage Loans***

Refer to Tables 8, 9 and 10 in the state of Nevada 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.

Distribution of home mortgage loans by borrower income characteristics in the Nevada Non-MSA AA is excellent. Distribution of EDSB's home refinance lending by borrower income characteristics is excellent. EDSB's percentage of 2012-2014 lending for home refinance exceeds both the percentage of low-income families as of the 2010 Census and the percentage of loans to low-income borrowers of the 2013 HMDA Peer Aggregate. EDSB's percentage of 2012-2014 lending for home refinance is somewhat below both the percentage of moderate-income families as of the 2010 Census and the percentage of moderate-income borrower lending of the 2013 HMDA Peer Aggregate. EDSB's 2011 lending to both low- and moderate-income borrowers was excellent. In 2013, EDSB's market share of home refinance loans to low-income borrowers exceeds its overall home refinance market share and its market share of lending to moderate-income borrowers is well below its overall home refinance market share.

### ***Small Loans to Businesses***

Refer to Table 11 in the state of Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

EDSB did not originate any small business loans in the Nevada AAs.

### ***Small Loans to Farms***

Refer to Table 12 in the state of Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The volume of small farm lending is too low to make statistically valid conclusions.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the state of Nevada section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

EDSB did not originate any CD loans during the evaluation period. While the bank offers commercial and agriculture loans that may also have a community development purpose, EDSB rarely makes loans in excess of \$1.0 million for commercial or agricultural purposes. EDSB's business and farm lending is in the form of smaller dollar loans and serve a different credit need. Small business or small farm loan of less than \$1.0 million must analyzed under the Borrower and Geographic Distribution components of the lending test and cannot be considered under the CD Lending component.

EDSB's retail lending activity, however, is strong and mitigates the bank's lack of CD lending.

## **Product Innovation and Flexibility**

EDSB is a portfolio lender, which allows the bank to underwrite loans for otherwise creditworthy borrowers that wouldn't qualify under secondary market investor guidelines. The new mortgage rules have had some negative impact on the bank's flexibility and loan volume, but the bank expects to continue to offer alternative underwriting standards.

EDSB's loan restructuring and modification activity offers temporary relief to borrowers that will allow some borrowers to stay in their home for the long-term while they weather financial setbacks. This activity is responsive.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the lending test in the Reno AA is weaker than the bank's overall high satisfactory performance under the lending test in Nevada. Lending in the Reno AA is very limited but EDSB maintains a higher HMDA loan market share in the Reno AA than its deposit market share. The Reno AA is a very small part of EDSB's operations. Refer to the Tables 1 through 13 in the state of Nevada section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the investment test in Nevada Non-MSA AA is rated Needs to Improve. Based on full-scope reviews, the bank's performance in the NV Non-MSA AA is poor.

Refer to Table 14 in the state of Nevada section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

EDSB makes a very low level of qualified investments in the NV Non-MSA AA. EDSB made one qualifying donation totaling \$2 thousand to a community development organization in the AA.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the investment test in the Reno AA is not inconsistent with the bank's overall needs to improve performance under the investment test in Nevada.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the service test in Nevada is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the NV Non-MSA is good.

### **Retail Banking Services**

Refer to Table 15 in the state of Nevada section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

EDSB's delivery systems are readily accessible to geographies and individuals of different income levels. EDSB's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. EDSB provides few CD services.

### ***Alternative Delivery Systems***

EDSB's delivery systems, including alternative delivery systems, are good. EDSB's delivery systems include two full service branches with automated teller machines (ATM); telephone banking; and online banking. Alternative delivery systems are reasonably accessible to all segments of the bank's AAs. In addition, EDSB offers VISA debit cards and participates in the STAR, INTERLINK, and Cirrus networks for point of sale transactions and access to millions of ATMs worldwide.

### ***Reasonableness of Services and Hours of Operations***

EDSB offers traditional savings and deposit products and provides money orders, travelers checks, and safe deposit boxes. EDSB offers low-cost and low-minimum balance checking and savings accounts that are accessible to low- and moderate-income customers, seniors, and custodial accounts for minors.

EDSB branch hours are universal among all the branches each weekday, with Saturday hours available at one location. Branch services and hours do not vary in a way that inconveniences portions of the AAs, particularly LMI individuals or geographies.

### ***Branch Network***

#### *Distribution of Branches*

EDSB's distribution of branches is good and readily accessible to geographies and individuals of different income levels. None of EDSB's branches are located in the single moderate-income census tract in Douglas County but only 3 percent of the population resides in the census tract. There are no low-income census tracts in the AA. EDSB operates two branch offices in the AA.

#### *Record of Opening and Closing Branches*

EDSB did not open or close any branches in the AA.

#### *Branch Hours and Services*

Branch lobby hours are Monday-Thursday 9AM-5PM and Friday 9AM-6PM. Each branch maintains an ATM. One branch maintains Saturday hours of 9AM-1PM. Business hours and services are reasonable and do not vary in a way that inconveniences any portion of the bank's assessment areas or any group of individuals.

### **Community Development Services**

A community development (CD) service is defined by the CRA regulation as a financial-related service targeted to low- and moderate-income individuals or other activities that serve to promote economic development for small businesses and small farms or to revitalize or stabilize underserved or distressed geographies.

EDSB did not provide any CD services in the NV Non-MSA AA during the evaluation period.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the service test in the Reno AA is not inconsistent with the bank's overall high satisfactory performance under the service test in Nevada.

## 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 metropolitan and nonmetropolitan areas 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/2011 to 12/31/2014 Investment and Service Tests and CD Loans: (01/01/2011 to 06/22/2015)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
El Dorado Savings Bank, F.S.B. (EDSB) Placerville, CA	HMDA Small Business Small Farm	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
California Sacramento AA #40900 (part) CA Non-MSA AA #99999 Nevada Reno AA #39900 (part) NV Non-MSA AA #99999	Full-Scope Full-Scope  Limited Scope Full-Scope	

# Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS El Dorado Savings Bank, F.S.B.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
El Dorado Savings Bank, F.S.B.	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Multistate Metropolitan Area or State:				
California	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Nevada	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory

(\*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

## Appendix C: Market Profiles for Full-Scope Areas

### State of California

### Sacramento AA

Demographic Information for Full Scope Area: Sacramento MSA AA (YR 2014)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	443	7.90	24.38	37.70	29.80	0.23
Population by Geography	1,948,278	7.31	24.34	37.11	30.89	0.35
Owner-Occupied Housing by Geography	448,988	3.88	18.39	40.45	37.29	0.00
Business by Geography	150,323	6.57	21.15	38.53	33.75	0.01
Farms by Geography	3,410	3.64	17.89	44.72	33.75	0.00
Family Distribution by Income Level	474,611	21.99	17.04	20.13	40.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	185,259	11.85	35.07	35.88	17.21	0.00
Median Family Income		71,816	Median Housing Value	356,610		
HUD Adjusted Median Family Income for 2014		68,000	Unemployment Rate (2010 US Census)	4.65%		
Households Below Poverty Level		11%				

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

Source: 2010 US Census and 2014 HUD updated MFI

Placer, El Dorado, and Sacramento Counties (Sacramento AA), along with Yolo County makes-up the Sacramento-Roseville-Arden Arcade MSA metropolitan area. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas. The bank has 20 branches in this AA, including the bank's headquarters. Approximately 63.8 percent of EDSB's total retail deposits and 63.7 percent of total reported loans originated or purchased during the evaluation period are in the AA. As of June 30, 2014, EDSB ranked ninth (out of 41) in deposits with a 2.68 percent market share, based on total deposits reported to the FDIC.

Unemployment rates consistently declined year over year, from 11.8 percent in 2011 to 7.2 percent in 2014. In 2015, rates continued to decline from 6.7 percent in January to 5.6 percent in April.

Sacramento is the hub of state government, and one in four jobs is in state government. The recession and the state's inherent budget issues caused job loss during the recession. Today, the state is once again hiring, and the area is headed toward economic stability. The Sacramento AA residents are well-educated and higher paying jobs contribute to the area's below average rate of poverty. The area's major sectors are government, professional services, education, and healthcare. Major employers are the State of California, Kaiser Permanente, UC Davis Health System, and Sutter health Sacramento Sierra Region. The AA has a number of economic assets: A transportation system that includes four major highways linking the area to other states; an updated international airport; a rail hub; a commercial port; a large system of healthcare providers; and a variety of educational facilities, including the University of

California-Davis, California State University Sacramento, American River College, Sacramento City College, and Sierra Community College.

Real estate has been a challenge in the area. Prior to the recession, there was a construction boom from 2000-2010. Twenty-five percent of the area's housing was built during that period. The boom was fueled by a demand for properties by Bay Area workers, low interest rates, and speculative construction. When the housing crisis hit the Sacramento-Roseville-Arden Arcade MSA, there were high foreclosure rates. There continues to be fluctuations in the Sacramento MSA housing opportunity index. Bulk investors, such as Blackstone began acquiring properties. The acquisitions limited opportunities for low-and moderate-income prospective homebuyers. At one point, Blackstone acquired 1,000 properties in the MSA. Post the recession, pressure is once again on the area from the same sources as in the past to acquire cheap land for development purposes.

The concentration of jobs in government services is indicative of the need for diversification in employment. There is a real need for development of an entrepreneurial sector. A contact with a local nonprofit indicated that a major need for local CDCs and CDFIs is operating funds, and capacity building. Small business loans from CDFIs and loan funds are needed. The greatest need is for operating funds to support local organizations.

**State of California**

**California Non-MSA AA**

Demographic Information for Full Scope Area: CA Non-MSA AA (YR 2014)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	56	0.00	5.36	51.79	41.07	1.79
Population by Geography	256,344	0.00	4.12	52.20	42.28	1.40
Owner-Occupied Housing by Geography	77,408	0.00	2.52	51.52	45.96	0.00
Business by Geography	22,160	0.00	5.24	57.76	37.00	0.00
Farms by Geography	884	0.00	2.04	54.52	43.44	0.00
Family Distribution by Income Level	70,372	15.38	16.14	19.49	48.99	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	22,183	0.00	6.68	57.29	36.03	0.00
Median Family Income HUD Adjusted Median Family Income for 2014 Households Below Poverty Level		55,928 54,700 9%	Median Housing Value Unemployment Rate (2010 US Census)		383,141 4.11%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 HUD updated MFI

The California Non-MSA AA consists of Amador, Calaveras, Inyo, Nevada, and Tuolumne counties. The bank has 12 branches in this AA. Approximately 32.3 percent of EDSB’s total retail deposits and 33.6 percent of total reported loans originated or purchased during the evaluation period are in the AA. As of June 30, 2014, EDSB ranked third (out of 20) in deposits with a 13.46 percent market share, based on total deposits reported to the FDIC.

Amador County

Accounting for 28 percent of all wage and salary jobs, the public sector is the largest employer in Amador County. The largest employment gains in 2013 were in leisure and hospitality, miscellaneous services, construction, and agriculture. There were substantial losses in government. Unemployment rates consistently declined year over year, from 13.6 percent in 2011 to 8.3 percent in 2014. In 2015, monthly rates continued to decline from 7.9 percent in January to 6.5 percent in April. There is a small but growing viticulture industry. As of 2014, 14.3 percent of the population was at or below the poverty line.

Calaveras County

In Calaveras County, the public sector is the largest employer, accounting for 30 percent of total wage and salary jobs. In 2013, the largest employment gains were in education and healthcare, wholesale and retail trade, construction, and professional and business. There were no sectors with substantial losses. Unemployment rates consistently declined year over year, from 14.1 percent in 2011 to 8.1 percent in 2014. In 2015, monthly rates continued to decline from 7.6 percent in January to 6.3 percent in April.

Approximately 360 wage and salary jobs were gained in Calaveras County in 2013, representing a growth rate of 4.6 percent. This is one of the fastest rates in California during the same period. As of 2014, 5.4 percent of the population was at or below the poverty line.

#### Inyo County

Inyo County is small in population, with less than 20,000 residents. The county's population has had limited growth since 1990, due to the scarcity of private land. Approximately 98 percent of land is publically managed, reducing potential for future development. The public sector accounts for 42 percent of total employment. There was positive job growth in 2013 in construction, wholesale and retail trade, and education and healthcare. Job losses were reported in professional services and government. Unemployment rates consistently declined year over year, from 9.7 percent in 2011 to 7.0 percent in 2014. In 2015, monthly rates continued to decline from 7.1 percent in January to 5.6 percent in April. As of 2014, 9.4 percent of the population was at or below the poverty line.

#### Nevada County

Employment in Nevada County is heavily reliant on tourism and recreation, with Soda Springs Ski Area, Sugar Bowl Ski Resort, and Boreal Mountain Resort being some of the largest employers. During 2013, the largest employment gains were in leisure and hospitality, education and healthcare, and construction. Manufacturing suffered employment losses. Unemployment rates consistently declined year over year, from 11.1 percent in 2011 to 6.6 percent in 2014. In 2015, monthly rates continued to decline from 6.2 percent in January to 5.3 percent in April. As of 2014, 8.2 percent of households were at or below the poverty line.

#### Tuolumne County

In Tuolumne County, 80 percent of land is owned by government agencies. The county is highly tourism-dependent. The largest industries are leisure and hospitality, education and healthcare, wholesale and retail trade, and government. Together, these sectors account for 76 percent of all wage and salary jobs. Much of the public sector employment is associated with the Sierra Conservation Center prison. The largest gains in 2013 employment were observed in leisure and hospitality, financial activities, and manufacturing. Declines were observed in education and healthcare, government, and construction. Unemployment rates consistently declined year over year, from 14.5 percent in 2011 to 8.7 percent in 2014. In 2015, monthly rates continued to decline from 8.4 percent in January to 7.0 percent in April. As of 2014, 10.5 percent of households were at or below the poverty level.

**State of Nevada**

**Nevada Non-MSA AA**

Demographic Information for Full Scope Area: Douglas County NV (YR 2014)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	16	0.00	6.25	56.25	37.50	0.00
Population by Geography	46,997	0.00	3.61	60.04	36.35	0.00
Owner-Occupied Housing by Geography	14,613	0.00	4.95	53.70	41.35	0.00
Business by Geography	3,749	0.00	2.08	50.87	47.05	0.00
Farms by Geography	172	0.00	3.49	40.12	56.40	0.00
Family Distribution by Income Level	13,479	15.58	16.00	21.17	47.25	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	4,257	0.00	6.72	68.52	24.76	0.00
Median Family Income HUD Adjusted Median Family Income for 2014 Households Below Poverty Level		64,296 57,900 8%	Median Housing Value Unemployment Rate (2010 US Census)		454,367 4.02%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 HUD updated MFI

The Nevada Non-MSA AA is comprised of Douglas County. The bank has two branches in this AA. Approximately 3.2 percent of EDSB’s total retail deposits and 1.8 percent of total reported loans originated or purchased during the evaluation period are in the AA. As of June 30, 2014, EDSB ranked fourth (out of 7) in deposits with a 6.32 percent market share, based on total deposits reported to the FDIC.

The largest employment sectors in Douglas County continue to be leisure and hospitality, representing 34 percent of total employment, followed by trade, transportation, utilities, and government. The number of jobs in Douglas County has been increasing at a moderate rate since 2010. Unemployment rates consistently declined year over year, from 13.3 percent in 2011 to 7.9 percent in 2014. In 2015, monthly rates continued to decline from 8.0 percent in January to 7.5 percent in April.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/AA. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/AA. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - 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 market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business 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 7. Geographic Distribution of Small Loans to Farms** - 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 market share information based on the most recent aggregate market data available. Because 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 8. Borrower Distribution of Home Purchase Loans** - 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 MA/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/AA.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Tables of Performance Data**

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State of California

Table 1. Lending Volume

LENDING VOLUME												
Geography: CALIFORNIA												
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014												
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
CA Non-MSA AA	33.87	572	78,983	5	1,053	10	2,024	0	0	587	82,060	33.58
Sacramento MSA AA	66.13	1,126	185,657	11	1,817	9	2,375	0	0	1,146	189,849	66.42

LENDING VOLUME												
Geography: CALIFORNIA												
Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011												
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
CA Non-MSA AA	36.52	208	27,800	4	556	2	288	0	0	214	28,644	33.58
Sacramento MSA AA	63.48	365	57,081	3	1,335	4	939	0	0	372	59,355	66.42

\* Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2014.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.  
 \* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2011.  
 \*\*\* Deposit Data as of July 01, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA**
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
CA Non-MSA AA	50.00	4	752	4	752	0	0	0	0	0	0	0	0	33.58
Sacramento MSA AA	50.00	4	755	4	755	0	0	0	0	0	0	0	0	66.42

LENDING VOLUME		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA**
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
CA Non-MSA AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	33.58
Sacramento MSA AA	100.00	5	1,041	5	1,041	0	0	0	0	0	0	0	0	66.42

\* Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2014.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.  
 \* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.  
 \*\*\* Deposit Data as of July 01, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	74	36.45	0.00	0.00	2.52	8.11	51.52	52.70	45.96	39.19	0.00	3.12	43.65	53.23
Sacramento MSA AA	129	63.55	3.88	1.55	18.39	10.85	40.45	55.81	37.29	31.78	3.61	15.61	39.49	41.28

Geographic Distribution: HOME PURCHASE			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	30	46.88	0.00	0.00	3.93	6.67	50.92	33.33	45.15	60.00	0.00	2.33	43.78	53.88
Sacramento MSA AA	34	53.13	3.39	0.00	17.85	11.76	42.76	55.88	36.00	32.35	2.64	12.67	40.01	44.68

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	132	36.07	0.00	0.00	2.52	7.58	51.52	52.27	45.96	40.15	0.00	1.89	51.10	47.00
Sacramento MSA AA	234	63.93	3.88	0.85	18.39	8.12	40.45	52.99	37.29	38.03	2.73	12.01	40.26	45.00

Geographic Distribution: HOME IMPROVEMENT			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	45	42.86	0.00	0.00	3.93	0.00	50.92	51.11	45.15	48.89	0.00	1.29	43.78	54.94
Sacramento MSA AA	60	57.14	3.39	1.67	17.85	11.67	42.76	60.00	36.00	26.67	2.72	17.23	38.50	41.55

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	365	32.36	0.00	0.00	2.52	5.75	51.52	52.33	45.96	41.92	0.00	3.36	44.88	51.76
Sacramento MSA AA	763	67.64	3.88	0.92	18.39	12.19	40.45	52.56	37.29	34.34	2.51	13.83	38.62	45.04

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	133	32.92	0.00	0.00	3.93	8.27	50.92	36.84	45.15	54.89	0.00	2.20	38.30	59.50
Sacramento MSA AA	271	67.08	3.39	0.37	17.85	7.38	42.76	54.61	36.00	37.64	1.62	7.26	34.41	56.71

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	1	100.00	0.00	0.00	22.19	0.00	69.09	100.00	8.72	0.00	0.00	28.57	71.43	0.00
Sacramento MSA AA	0	0.00	11.85	0.00	36.05	0.00	35.35	0.00	16.75	0.00	13.61	39.27	35.08	12.04

Geographic Distribution: MULTIFAMILY		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	0	0.00	0.00	0.00	24.89	0.00	50.22	0.00	24.89	0.00	0.00	28.57	71.43	0.00
Sacramento MSA AA	0	0.00	10.73	0.00	36.33	0.00	38.20	0.00	14.73	0.00	18.03	32.79	36.89	12.30

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businessses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	5	31.25	0.00	0.00	5.24	0.00	57.76	20.00	37.00	80.00	0.00	4.80	55.86	39.35
Sacramento MSA AA	11	68.75	6.57	9.09	21.15	18.18	38.53	27.27	33.75	45.45	6.21	18.82	36.64	38.33

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businessses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	4	57.14	0.00	0.00	7.25	50.00	50.16	50.00	42.59	0.00	0.00	6.56	48.50	44.95
Sacramento MSA AA	3	42.86	5.58	33.33	18.49	0.00	38.40	66.67	37.54	0.00	4.55	16.15	35.92	43.37

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2014).

\* Based on 2011 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	10	52.63	0.00	0.00	2.04	0.00	54.52	80.00	43.44	20.00	0.00	0.00	58.46	41.54
Sacramento MSA AA	9	47.37	3.64	0.00	17.89	0.00	44.72	66.67	33.75	33.33	1.77	9.73	52.65	35.84

Geographic Distribution: SMALL LOANS TO FARMS			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	2	33.33	0.00	0.00	3.82	0.00	54.22	0.00	41.97	100.00	0.00	5.26	44.74	50.00
Sacramento MSA AA	4	66.67	3.59	0.00	14.99	0.00	46.25	100.00	35.17	0.00	1.29	9.87	46.35	42.49

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2014).

\* Based on 2011 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>3</sup>	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	74	36.45	15.38	5.41	16.14	16.22	19.49	22.97	48.99	55.41	2.39	12.05	20.53	65.04
Sacramento MSA AA	129	63.55	21.99	12.30	17.04	13.11	20.13	23.77	40.84	50.82	6.02	19.37	25.26	49.34

Borrower Distribution: HOME PURCHASE		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>4</sup>	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	30	46.88	15.04	0.00	15.87	16.67	20.72	30.00	48.38	53.33	3.72	15.14	21.34	59.80
Sacramento MSA AA	34	53.13	20.45	12.90	18.26	16.13	21.03	35.48	40.26	35.48	14.00	26.11	22.52	37.37

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.4% of loans originated and purchased by BANK.

3 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.7% of loans originated and purchased by BANK.

4 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total*	% Families**	% BANK Loans***	% Families 5	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	132	36.07	15.38	10.69	16.14	17.56	19.49	28.24	48.99	43.51	5.50	14.24	26.86	53.40
Sacramento MSA AA	234	63.93	21.99	14.60	17.04	20.35	20.13	23.01	40.84	42.04	6.01	15.22	24.26	54.50

Borrower Distribution: HOME IMPROVEMENT		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total*	% Families**	% BANK Loans***	% Families 6	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
CA Non-MSA AA	45	42.86	15.04	9.30	15.87	25.58	20.72	25.58	48.38	39.53	7.62	16.67	20.00	55.71
Sacramento MSA AA	60	57.14	20.45	15.25	18.26	28.81	21.03	37.29	40.26	18.64	11.23	19.30	24.77	44.70

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.5% of loans originated and purchased by BANK.

5 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by BANK.

6 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Aggregate Lending Data*			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers						
	#	% of Total*	% Families***	% BANK Loans****	% Families 7	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp	
<b>Full Review:</b>															
CA Non-MSA AA	365	32.36	15.38	7.02	16.14	20.22	19.49	24.72	48.99	48.03	5.16	10.96	18.48	65.40	
Sacramento MSA AA	763	67.64	21.99	13.53	17.04	17.73	20.13	24.49	40.84	44.25	6.71	14.98	24.40	53.91	

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011					Aggregate Lending Data*			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers						
	#	% of Total*	% Families***	% BANK Loans****	% Families 8	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp	
<b>Full Review:</b>															
CA Non-MSA AA	133	32.92	15.04	9.38	15.87	10.16	20.72	27.34	48.38	53.13	3.29	9.15	16.74	70.83	
Sacramento MSA AA	271	67.08	20.45	12.83	18.26	21.89	21.03	22.64	40.26	42.64	6.63	14.43	23.30	55.64	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by BANK.

7 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by BANK.

8 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11a. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
CA Non-MSA AA	5	31.25	78.17	100.00	20.00	40.00	40.00	4,938	2,478
Sacramento MSA AA	11	68.75	74.40	100.00	18.18	72.73	9.09	35,958	18,339

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
CA Non-MSA AA	4	57.14	73.57	100.00	50.00	50.00	0.00	5,480	2,672
Sacramento MSA AA	3	42.86	69.67	100.00	33.33	0.00	66.67	38,479	19,040

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

\* Based on 2011 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS			Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
CA Non-MSA AA	10	52.63	97.17	100.00	30.00	20.00	50.00	70	40
Sacramento MSA AA	9	47.37	95.22	100.00	11.11	33.33	55.56	230	129

Borrower Distribution: SMALL LOANS TO FARMS			Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
CA Non-MSA AA	2	33.33	97.59	100.00	50.00	50.00	0.00	78	51
Sacramento MSA AA	4	66.67	95.72	100.00	0.00	75.00	25.00	234	165

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2014).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

\* Based on 2011 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: CALIFORNIA									
Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
CA Non-MSA AA	0	0	6	31	6	31	0.33	0	0
Sacramento MSA AA	0	0	33	156	33	156	1.62	0	0
Statewide	6	5,551	8	3,764	8	9,315	98.03	4	685

\* 'Prior Period Investments' means investments made in a previous 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.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
CA Non-MSA AA	33.58	12	37.50	0.00	8.33	50.00	41.67	0	0	0	0	0	0	0.00	4.12	52.20	42.28
Sacramento MSA AA	66.42	20	62.50	0.00	30.00	45.00	25.00	0	0	0	0	0	0	7.31	24.34	37.11	30.89

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM				Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014									
Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
CA Non-MSA AA	33.58	12	37.50	0	8	50	42	12	37.50	0	1	6	5	0.00	4.12	52.20	42.28
Sacramento MSA AA	66.42	20	62.50	0	30	45	25	20	62.50	0	6	9	5	7.31	24.34	37.11	30.89

State of Nevada

**Table 1. Lending Volume**

LENDING VOLUME													Geography: NEVADA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014	
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)					
<b>Full Review:</b>																
Douglas County NV	67.35	32	6,263	0	0	1	325	0	0	33	6,588	81.54				
<b>Limited Review:</b>																
Washoe County NV	32.65	16	2,263	0	0	0	0	0	0	16	2,263	18.46				

LENDING VOLUME													Geography: NEVADA		Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011	
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)					
<b>Full Review:</b>																
Douglas County NV	68.75	11	1,911	0	0	0	0	0	0	11	1,911	0.00				
<b>Limited Review:</b>																
Washoe County NV	31.25	5	459	0	0	0	0	0	0	5	459	0.00				

\* Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2014.  
 \*\*\* Deposit Data as of June 30, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.  
 \* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from January 01, 2011 to December 31, 2011.  
 \*\*\* Deposit Data as of July 01, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: NEVADA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	6	85.71	0.00	0.00	4.95	16.67	53.70	50.00	41.35	33.33	0.00	4.77	55.10	40.13
<b>Limited Review:</b>														
Washoe County NV	1	14.29	3.53	0.00	15.70	0.00	36.70	0.00	44.07	100.00	1.80	11.08	38.05	49.07

Geographic Distribution: HOME PURCHASE			Geography: NEVADA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	1	100.00	0.00	0.00	6.46	0.00	40.82	0.00	52.72	100.00	0.00	3.97	40.32	55.71
<b>Limited Review:</b>														
Washoe County NV	0	0.00	0.99	0.00	16.60	0.00	43.47	0.00	38.95	0.00	0.15	7.89	44.30	47.66

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: NEVADA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units**	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	3	100.00	0.00	0.00	4.95	0.00	53.70	66.67	41.35	33.33	0.00	4.65	25.58	69.77
<b>Limited Review:</b>														
Washoe County NV	0	0.00	3.53	0.00	15.70	0.00	36.70	0.00	44.07	0.00	2.14	11.54	32.91	53.42

Geographic Distribution: HOME IMPROVEMENT			Geography: NEVADA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units**	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	0	0.00	0.00	0.00	6.46	0.00	40.82	0.00	52.72	0.00	0.00	0.00	18.75	81.25
<b>Limited Review:</b>														
Washoe County NV	0	0.00	0.99	0.00	16.60	0.00	43.47	0.00	38.95	0.00	0.67	7.33	34.00	58.00

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: NEVADA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	23	60.53	0.00	0.00	4.95	4.35	53.70	47.83	41.35	47.83	0.00	2.32	51.90	45.78
<b>Limited Review:</b>														
Washoe County NV	15	39.47	3.53	0.00	15.70	6.67	36.70	60.00	44.07	33.33	2.14	10.78	34.08	53.01

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: NEVADA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	10	66.67	0.00	0.00	6.46	0.00	40.82	40.00	52.72	60.00	0.00	2.42	32.01	65.57
<b>Limited Review:</b>														
Washoe County NV	5	33.33	0.99	0.00	16.60	0.00	43.47	20.00	38.95	80.00	0.24	5.91	32.06	61.79

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: NEVADA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	0	0.00	0.00	0.00	0.60	0.00	62.68	0.00	36.72	0.00	0.00	0.00	50.00	50.00
<b>Limited Review:</b>														
Washoe County NV	0	0.00	23.38	0.00	42.85	0.00	22.09	0.00	11.69	0.00	33.33	42.42	15.15	9.09

Geographic Distribution: MULTIFAMILY		Geography: NEVADA					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	0	0.00	0.00	0.00	0.00	0.00	52.96	0.00	47.04	0.00	0.00	0.00	100.00	0.00
<b>Limited Review:</b>														
Washoe County NV	0	0.00	11.65	0.00	53.61	0.00	24.69	0.00	10.05	0.00	5.56	66.67	27.78	0.00

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multi family housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: NEVADA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businessses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	0	0.00	0.00	0.00	2.08	0.00	50.87	0.00	47.05	0.00	0.00	1.37	44.92	53.71
<b>Limited Review:</b>														
Washoe County NV	0	0.00	10.73	0.00	28.87	0.00	21.55	0.00	33.94	0.00	8.13	27.09	22.24	42.54

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: NEVADA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businessses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businessses***	% BANK Loans	% of Businessses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	0	0.00	0.00	0.00	5.16	0.00	39.49	0.00	55.35	0.00	0.00	5.07	33.97	60.97
<b>Limited Review:</b>														
Washoe County NV	0	0.00	2.48	0.00	33.85	0.00	29.47	0.00	34.20	0.00	1.69	30.73	27.17	40.41

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2014).

\* Based on 2011 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: NEVADA								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*				
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp	
<b>Full Review:</b>															
Douglas County NV	1	100.00	0.00	0.00	3.49	0.00	40.12	0.00	56.40	100.00	0.00	0.00	14.29	85.71	
<b>Limited Review:</b>															
Washoe County NV	0	0.00	6.69	0.00	22.18	0.00	28.87	0.00	40.67	0.00	9.09	12.12	36.36	42.42	

Geographic Distribution: SMALL LOANS TO FARMS		Geography: NEVADA								Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011					
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*				
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp	
<b>Full Review:</b>															
Douglas County NV	0	0.00	0.00	0.00	4.86	0.00	34.05	0.00	61.08	0.00	0.00	4.55	31.82	63.64	
<b>Limited Review:</b>															
Washoe County NV	0	0.00	1.40	0.00	22.59	0.00	37.38	0.00	38.63	0.00	2.70	29.73	35.14	32.43	

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2014).

\* Based on 2011 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: NEVADA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>9</sup>	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	6	85.71	15.58	0.00	16.00	50.00	21.17	0.00	47.25	50.00	6.32	18.24	23.60	51.85
<b>Limited Review:</b>														
Washoe County NV	1	14.29	20.97	0.00	17.79	0.00	20.40	0.00	40.84	100.00	7.77	20.13	24.24	47.86

Borrower Distribution: HOME PURCHASE		Geography: NEVADA					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>10</sup>	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	1	100.00	13.34	0.00	14.63	100.00	24.49	0.00	47.54	0.00	7.52	21.48	25.72	45.28
<b>Limited Review:</b>														
Washoe County NV	0	0.00	19.17	0.00	18.84	0.00	23.06	0.00	38.94	0.00	18.96	25.74	22.64	32.65

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

9 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

10 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: NEVADA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total*	% Families**	% BANK Loans***	% Families 11	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	3	100.00	15.58	0.00	16.00	0.00	21.17	33.33	47.25	66.67	10.26	15.38	23.08	51.28
<b>Limited Review:</b>														
Washoe County NV	0	0.00	20.97	0.00	17.79	0.00	20.40	0.00	40.84	0.00	8.14	20.36	31.67	39.82

Borrower Distribution: HOME IMPROVEMENT		Geography: NEVADA						Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total*	% Families**	% BANK Loans***	% Families 12	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Low	Mod	Mid	Upp
<b>Full Review:</b>														
Douglas County NV	0	0.00	13.34	0.00	14.63	0.00	24.49	0.00	47.54	0.00	9.38	37.50	6.25	46.88
<b>Limited Review:</b>														
Washoe County NV	0	0.00	19.17	0.00	18.84	0.00	23.06	0.00	38.94	0.00	13.77	18.84	20.29	47.10

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

11 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

12 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: NEVADA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Aggregate Lending Data*			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families 13	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****					
<b>Full Review:</b>															
Douglas County NV	23	60.53	15.58	18.18	16.00	13.64	21.17	36.36	47.25	31.82	7.96	15.20	19.61	57.24	
<b>Limited Review:</b>															
Washoe County NV	15	39.47	20.97	6.67	17.79	6.67	20.40	46.67	40.84	40.00	7.76	15.94	23.17	53.12	

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: NEVADA				Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011					Aggregate Lending Data*			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Low	Mod	Mid	Upp	
	#	% of Total*	% Families***	% BANK Loans****	% Families 14	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****					
<b>Full Review:</b>															
Douglas County NV	10	66.67	13.34	11.11	14.63	22.22	24.49	22.22	47.54	44.44	6.59	14.62	19.56	59.23	
<b>Limited Review:</b>															
Washoe County NV	5	33.33	19.17	0.00	18.84	60.00	23.06	0.00	38.94	40.00	7.58	15.30	21.67	55.45	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.6% of loans originated and purchased by BANK.

13 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 6.7% of loans originated and purchased by BANK.

14 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11a. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: NEVADA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Douglas County NV	0	0.00	76.47	0.00	0.00	0.00	0.00	1,522	817
<b>Limited Review:</b>									
Washoe County NV	0	0.00	71.58	0.00	0.00	0.00	0.00	9,262	4,771

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: NEVADA		Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Douglas County NV	0	0.00	73.72	0.00	0.00	0.00	0.00	1,754	886
<b>Limited Review:</b>									
Washoe County NV	0	0.00	68.20	0.00	0.00	0.00	0.00	10,282	5,218

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

\* Based on 2011 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: NEVADA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Douglas County NV	1	100.00	98.26	100.00	0.00	0.00	100.00	12	11
<b>Limited Review:</b>									
Washoe County NV	0	0.00	94.89	0.00	0.00	0.00	0.00	39	18

Borrower Distribution: SMALL LOANS TO FARMS		Geography: NEVADA			Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Douglas County NV	0	0.00	95.68	0.00	0.00	0.00	0.00	25	17
<b>Limited Review:</b>									
Washoe County NV	0	0.00	93.61	0.00	0.00	0.00	0.00	39	20

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2014).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

\* Based on 2011 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NEVADA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Douglas County NV	0	0	1	2	1	2	67.00	0	0
<b>Limited Review:</b>									
Washoe County NV	0	0	1	1	1	1	33.00	0	0

\* 'Prior Period Investments' means investments made in a previous 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.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: NEVADA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Douglas County NV	81.54	2	66.67	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	3.61	60.04	36.35
<b>Limited Review:</b>																	
Washoe County NV	18.46	1	33.33	0.00	0.00	100.00	0.00	0	0	0	0	0	0	10.21	22.54	34.23	32.97

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM				Geography: NEVADA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014									
Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Douglas County NV	81.54	2	66.67	0	0	100	0	2	66.67	0	0	2	0	0.00	3.61	60.04	36.35
<b>Limited Review:</b>																	
Washoe County NV	18.46	1	33.33	0	0	100	0	1	33.33	0	0	1	0	10.21	22.54	34.23	32.97

