PUBLIC DISCLOSURE

August 12, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

East West Bank RSSD # 197478

135 North Los Robles Avenue, 7th Floor Pasadena, California 91101

> Federal Reserve Bank of San Francisco 101 Market Street San Francisco, California 94105

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with the safe and sound operation of the institution. This evaluation is not, nor should it 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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INSTITUTION RATING

Institution's Community Reinvestment Act (CRA) Rating

East West Bank is rated "OUTSTANDING"

The following table shows the performance level of East West Bank with respect to the lending, investment, and service tests.

PERFORMANCE	PERFORMANCE TESTS							
LEVELS	LENDING TEST*	INVESTMENT TEST	Service Test					
Outstanding	x	x						
HIGH SATISFACTORY			х					
Low Satisfactory								
NEEDS TO IMPROVE								
SUBSTANTIAL NONCOMPLIANCE								

^{*} The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

The major factors supporting the institution's rating include:

- Lending levels that reflect excellent responsiveness to assessment area credit needs with a substantial majority of loans made inside the bank's assessment areas.
- Extensive use of innovative and/or flexible lending practices in meeting the credit needs of the assessment areas.
- Overall excellent geographic and borrower distribution of loans driven primarily by the strong distribution of small business loans.
- Demonstrated leadership in making community development loans that helped address the
 critical needs of affordable housing, revitalization or stabilization of low- or moderate-income
 geographies, and support for small businesses in the bank's assessment areas.
- Excellent levels of qualified community development investments and donations while making extensive use of innovative or complex investments to support community development initiatives.
- Reasonably accessible retail banking services, including low- and moderate-income areas and relatively high levels of community development services that benefited low- and moderateincome individuals and small businesses.
- Innovative and strategic partnerships with non-profits that enhanced overall performance.

Institution

Description of Institution

East West Bank (EWB/bank), with \$72.3 billion in total assets as of June 30, 2024, is a minority-owned depository institution (MDI) that is wholly owned by and the principal subsidiary of East West Bancorp. Both entities are headquartered in Pasadena, California. EWB opened in 1973 as a federally chartered savings institution with a core mission to serve the Chinese American and Chinese immigrant population. The bank's current customer base includes immigrants from other countries who lack the traditional documentation needed at most financial institutions to open bank accounts and obtain credit. The bank converted to a state chartered commercial bank in 1995, and in September 2004, it became a member of the Federal Reserve System. Since its formation, EWB has grown through a combination of organic growth and a series of acquisitions. As of August 12, 2024, the bank operated 98 full-service branches in seven states – 70 in California, 12 in Texas, six in New York, four in Washington, three in Georgia, two in Massachusetts, and one in Nevada. EWB also has three full-service branches in Greater China – one in Shanghai, Shantou, and Shenzhen. In addition, the bank has four representative offices in Greater China located in Beijing, Chongqing, Guangzhou, Xiamen, and a representative office in Singapore.

EWB is a full-service commercial bank serving consumers and businesses throughout the United States and in China. The bank provides a wide range of personal and commercial banking services. Commercial real estate continues to be the bank's primary focus, while loans secured by multi-family properties is a niche product in several of the bank's markets. The bank also offers a range of commercial loan products, Small Business Administration (SBA) loans, and commercial and residential construction loans. Consumer purpose loans include home purchase and home mortgage refinance loans as well as home equity lines of credit, credit cards and auto loans. EWB does not originate subprime home mortgage loans or loans with non-traditional features, such as interest-only periods, teaser rates, or negative amortization.

Exhibit 1 below represents the loan portfolio as of December 31, 2023. The loan mix reflects the bank's commercial focus.

Ехнівіт 1								
LOANS AND LEASES AS OF DECEMBER 31, 2023								
Loan Type	\$ ('000s)	%						
Commercial/Industrial & Non-Farm Non-Residential Real Estate	24,140,560	48.3						
Secured by 1-4 Family Residential Real Estate	15,765,011	31.6						
All Other	4,804,451	9.6						
Multi-Family Residential Real Estate	4,543,473	9.1						
Construction & Land Development	640,223	1.3						
Farm Land & Agriculture	45,083	0.1						
Consumer Loans & Credit Cards	11,468	0.0						
Total (Gross)	49,950,269	100.0						

EWB's assessment areas have not changed since the prior examination. The bank delineates 11 assessment areas across seven states. The bank's assessment areas are as follows:

- Southern California comprised of Los Angeles, Orange, and San Bernardino Counties in their entirety. Los Angeles County comprises the Los Angeles-Long Beach-Glendale Metropolitan Division (MD) and Orange County comprises the Anaheim-Santa Ana-Irvine MD. Together, these two counties make up the Los Angeles-Long Beach-Anaheim Metropolitan Statistical Area (MSA). San Bernardino County is part of the Riverside-San Bernardino-Ontario MSA. Each of these counties are also part of the Los Angeles-Long Beach Combined Statistical Area (CSA).
- San Francisco Bay Area (Bay Area) comprised of Alameda, San Francisco, San Mateo, and Santa Clara counties in their entirety. San Francisco and San Mateo counties make up the San Francisco-San Mateo-Redwood City MD. Alameda County is one of two counties that constitute the Oakland-Berkeley Livermore MD. In addition, the three counties are all part of the San Francisco-Oakland-Berkeley MSA. Santa Clara County is one of two counties forming the San Jose-Sunnyvale-Santa Clara MSA. All counties in the assessment area are part of the San Jose-San Francisco-Oakland CSA.
- Sacramento comprised of Sacramento County in its entirety is one of four counties that constitute the Sacramento-Roseville-Folsom MSA.
- San Diego comprised of San Diego County in its entirety, constitutes the San Diego-Chula Vista- Carlsbad MSA.
- New York comprised of Bronx, Kings, New York, Queens, and Richmond counties in their entirety. These counties represent the five New York City boroughs and are part of the New York-Jersey City-White Plains MD, which is part of the multi-state New York-Newark-Jersey City MSA.
- **Houston** comprised of Fort Bend and Harris counties in their entirety are part of the Houston-The Woodlands-Sugar Land MSA.
- **Dallas** comprised of Collin and Dallas counties in their entirety are part of the Dallas-Plano-Irving MD and Dallas-Fort Worth-Arlington MSA.
- Washington comprised of King County in its entirety. King is one of two counties in the Seattle- Bellevue-Kent MD, which is part of the Seattle-Tacoma-Bellevue MSA.
- **Georgia** comprised of 15 the 29 counties in the Atlanta-Sandy Springs-Alpharetta MSA. The 15 counties include Barrow, Bartow, Cherokee, Clayton, Cobb, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding, Rockdale, and Spalding counties.
- Massachusetts comprised of Middlesex, Norfolk, and Suffolk counties in their entirety. Norfolk and Suffolk Counties are part of the Boston MD and Middlesex County is part of the Cambridge-Newton-Framingham MD. The three counties are also part of the multi-state Boston-Cambridge-Newton MSA.
- **Nevada** comprised of Clark County in its entirety constitutes the Las Vegas-Henderson-Paradise MSA.

The bank's largest physical presence remains in Southern California where 46 of the 98 branches are located. The bank's presence in Northern California consists of 22 branches, where the bank has its second largest presence, followed by Houston, with nine branches. As previously noted, EWB has a limited branch presence in each of its remaining assessment areas.

EWB received an outstanding performance rating at its March 8, 2021, CRA examination. During the review period for this examination, there were no legal or financial impediments that inhibited the

bank's ability to meet the credit needs of its communities, consistent with its business strategy, size, financial capacity, and local economic conditions.

Scope of Examination

EWB's performance was assessed in accordance with the *Interagency Large Institution CRA Examination Procedures*. As such, performance was assessed under the lending, investment, and service tests. The evaluation period for the lending test was January 1, 2020, through December 31, 2023. The evaluation period for community development loans, qualified investments, and community development services was January 1, 2021, through August 12, 2024.

The lending test is weighted more heavily than either the investment or service tests. The lending test evaluation is based on the following loan products – small business loans, home mortgage loans (purchase, refinance, and home equity), loans secured by multi-family residential dwellings, and community development loans. The investment test is based on a review of qualified community development investments made during the review period or during a prior period that remained on the bank's books, as well as community development donations. The service test evaluation is based on a review of retail banking services and qualified community development services provided during the review period.

All of EWB's assessment areas received full-scope reviews with the exception of Dallas, Sacramento, and San Diego, which received limited-scope reviews given the bank's limited presence and level of activity in those areas. Although the bank's presence and activity in Washington, Georgia, Massachusetts, and Nevada is also limited, they received full-scope reviews in order to determine the overall performance and assign ratings in those states. Given the concentration of deposit and lending activity in the area, the Southern California assessment area received the greatest weight followed by the Bay Area assessment area and the New York assessment area. Assessment areas are presented throughout this report in descending order based on deposit and loan volumes beginning with California (Southern California and the Bay Area), followed by New York, Houston, Washington, Georgia, Massachusetts, and Nevada.

Product specific performance under the lending test is weighted according to the bank's business focus, its actual deposit and lending activity, and opportunities within each assessment area. As such, small business loans followed by home purchase loans were weighted more heavily than other loan types based on the bank's business strategy, transaction volumes and the dollar amount of loans originated or purchased.

Many of the bank's consumer products are structured with the bank's target immigrant customer profile in mind and consider the fact that some consumers in this demographic may have limited formal credit histories and lack income documentation but are able to demonstrate creditworthiness through alternative means. As a result, borrower income is not available for the majority of the housing-related loans originated during the review period.

Adjustments were made to the scope in individual assessment areas to reflect variances between the different areas. All loan types were used to evaluate responsiveness to assessment area credit needs based on the volume of lending. Community development loans were also assessed in all assessment areas. Reported small business, home mortgage, and multi-family loans were evaluated in all areas

where there was sufficient volume for meaningful conclusions. Home mortgage other purpose lines of credit, home mortgage other purpose closed-end loans, and home mortgage not applicable loans did not influence the overall assessment in any of the assessment areas.

All lending data is presented in the lending volume tables contained in Appendix E – CRA Core Tables, and these tables are referenced throughout this document. The scope of the review is consistent throughout the performance evaluation, unless otherwise noted.

In addition, 16 interviews with community representatives were relied upon in connection with this examination to provide information regarding credit needs and market conditions within each assessment area. Contacts primarily represented organizations working in economic and community development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

This section of the performance evaluation contains conclusions regarding the bank's overall performance followed by specific conclusions regarding individual states and assessment areas within each of the seven states where the bank has full-service branches. In accordance with the *Interagency CRA Large Institution Examination Procedures*, at least one assessment area from each state received a full-scope review, and each state earned a separate rating. However, with 67 and 88 percent of the bank's lending and deposit activity, respectively, within the California assessment areas, conclusions for the state of California heavily influenced EWB's overall performance under each of the three performance tests. The overall state conclusions are based on performance within the respective assessment areas and relevant contextual information.

Lending Test

EWB's overall performance under the lending test is outstanding. Lending within the Southern California, Bay Area, New York, Houston, Massachusetts, and Nevada assessment areas was excellent given the economic conditions and competitive environment of those areas, as well as the bank's financial capacity. Performance was good in the remaining markets, with consistent performance in the limited scope assessment areas. Geographic and borrower distributions of loans were generally excellent. In addition, excellent to relatively high levels of community development loans were noted in each assessment area, with above average performance noted in all three limited-scope assessment areas.

LENDING ACTIVITY

Overall lending levels reflect excellent responsiveness to assessment area credit needs, primarily driven by activity in the Southern California, Bay Area, and New York assessment areas. Loan volumes in the assessment areas were also generally comparable with the bank's share of deposits in those markets. Overall loan volumes are displayed in Exhibit 2 on the next page, and volumes within the respective assessment areas are shown in Tables 1, 52, 67, 94, 109, 124, and 139.

Ехнівіт 2										
SUMMARY OF LENDING ACTIVITY										
JANUARY 1, 2020 TO DECEMBER 31, 2023										
Loan Type # % \$(000s) %										
Home Improvement	1,173	1.3	\$548,784	2.6						
Home Purchase	19,574	21.1	\$10,339,008	48.7						
Multi-Family Housing	762	0.8	\$2,470,032	11.6						
Refinancing	8,137	8.8	\$4,163,884	19.6						
Loan Purpose Not Applicable	19	0.0	\$3,887	0.0						
Other Purpose Closed-End	674	0.7	\$329,000	1.5						
Other Purpose LOC	1,465	1.6	\$555,973	2.6						
Total HMDA related	31,804	34.2	\$18,410,568	87						
Small Business	61,116	65.8	\$2,804,593	13						
Total Small Business related	61,116	65.8	\$2,804,593	13						
TOTAL LOANS	92,920	100	\$21,215,161	100						

ASSESSMENT AREA CONCENTRATION

A substantial majority of loans by number and dollar volume were made within the bank's assessment areas. Exhibit 3 below shows the number and dollar volume of loans extended within the designated assessment areas during the review period. The tables in Appendix E contain additional information regarding assessment area-specific lending activity.

Ехнівіт 3										
LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREAS										
	JANUARY 1, 2020 TO DECEMBER 31, 2023									
Loan Types			Inside			(Outside			
Loan Types	#	%	\$(000s)	%	#	%	\$(000s)	%		
Home Improvement	1,111	94.7	\$527,669	96.2	62	5.3	\$21,115	3.8		
Home Purchase - Conventional	18,209	93	\$9,744,359	94.2	1,365	7	\$594,649	5.8		
Loan Purpose Not Applicable	14	73.7	\$1,922	49.4	5	26.3	\$1,965	50.6		
Multi-Family Housing	641	84.1	\$1,512,878	61.2	121	15.9	\$957,154	38.8		
Other Purpose Closed- End	635	94.2	\$312,648	95	39	5.8	\$16,352	5		
Other Purpose LOC	1,332	90.9	\$521,513	93.8	133	9.1	\$34,460	6.2		
Refinancing	7,779	95.6	\$3,979,543	95.6	358	4.4	\$184,341	4.4		
Total HMDA related	29,721	93.5	\$16,600,532	90.2	2,083	6.5	\$1,810,036	9.8		
Small Business	59,536	97.4	\$2,499,365	89.1	1,580	2.6	\$305,228	10.9		
Total Small Bus. related	59,536	97.4	\$2,499,365	89.1	1,580	2.6	\$305,228	10.9		
TOTAL LOANS	89,257	96.1	\$19,099,897	90	3,663	3.9	\$2,115,264	10		

GEOGRAPHIC AND BORROWER DISTRIBUTION

The geographic distribution of loans and penetration among borrowers of different incomes and businesses of different sizes are generally excellent. These conclusions are based on a variety of contextual factors that affect the individual conclusions in the separate assessment areas. Among these are strategic partnerships with non-profit organizations that serve very small businesses and special residential mortgage lending programs targeted to low- and moderate-income individuals. The facts and data supporting the overall conclusions are presented within the separate assessment area analyses.

Geographic distribution of credit is generally excellent. The performance of small business lending in certain markets was the driving factor in the overall assessment of the bank's geographic lending distribution. Strong Home Mortgage Disclosure Act (HMDA) lending performance was also noted in several of the bank's assessment areas. Small business loan distribution was excellent in the bank's primary markets, to include Southern California, Bay Area, and New York, as well as in Houston, Massachusetts, and Georgia. Dispersion of home mortgage lending was excellent in the Bay Area, New York, Nevada, and Georgia assessment areas, and good performance was demonstrated in Southern California, Washington, Houston, and Massachusetts. Lending patterns during the review period generally followed the locations of the bank's branches and concentrations of local small businesses or owner-occupied housing units and did not demonstrate any unusual patterns or unexplained lending gaps.

Distribution of credit by borrower profile was also generally excellent. The borrower distribution assessment was driven by the performance of small business lending in the assessment areas where sufficient data was available to conduct meaningful analyses, as the bank does not rely on income data in qualifying a majority of its mortgage loans. Distribution of credit among businesses of different revenue sizes was excellent in the Southern California, Bay Area, New York, Houston, and Massachusetts assessment areas. Lending levels to small businesses were generally excellent, largely due to EWB's continued partnership with a non-profit organization that serves very small businesses, which substantially increased the number of small business loans in small loan amounts, thus enhancing performance. Additionally, the bank continued to provide support through engagement in the Paycheck Protection Program (PPP) during the review period, extending 13,021 PPP loans totaling nearly \$2.8 billion since the prior examination, and renewing or extending 93 PPP loans totaling over \$32.9 million.

The bank uses flexible underwriting designed to accommodate its target market of recent immigrants that also accommodates other borrowers and small business owners that lack credit experience and documentation required by other financial institutions. In addition to flexible underwriting, the bank offers the following innovative and flexible lending programs.

- Micro-Home Equity Line of Credit (HELOC) product offers low-cost credit lines of between \$5,000 and \$10,000. This product was developed to be path out of high-interest rate credit card debt and is also used by borrowers as downpayment assistance or financing for home repairs.
 The bank extended 351 micro-HELOCs totaling \$1,955,560 between 2020 and 2023.
- Bridge to Home Affordable Home Loan Program targets low- and moderate-income borrowers
 who have limited credit history with no minimum credit score requirement. The program
 includes a low interest rate and higher loan-to-value ratio and no private mortgage insurance.
 This program is offered in conjunction with down-payment assistance programs, including the

Federal Home Loan Bank (FHLB) Workforce Initiative Subsidy for Homeownership (WISH) program as well as EWB's proprietary REACH program, both of which are forgivable down payment assistance funds. The bank extended 1,616 Bridge to Home loans totaling nearly \$622 million between 2020 and 2023.

- The bank has piloted a mortgage product for low- and moderate-income borrowers. This product is a non-qualified mortgage loan that allows a higher loan-to-value ratio, offers low interest rates, excludes private mortgage insurance requirement, and can be used along with down payment assistance programs. The bank originated 1,557 mortgages totaling \$424.2 million, in addition to purchasing 2,666 mortgages to low- and moderate- income borrowers totaling \$671.8 million, between 2020 and 2023.
- Fannie Mae HomeReady Mortgages are offered to low-income borrowers for first-time or repeat homebuyers that have limited cash for down payment and lower pricing for higher credit scores. Loans can be for purchase or refinance and supplemental boarder or rental income is used to qualify borrowers. For first-time home buyers, at least one borrower is required to take a homeownership class. The bank extended 4 HomeReady loans totaling \$612,300 during the review period.
- Credit Card Product. The bank offers a proprietary credit card product for consumers with limited credit history. The bank also offers secured cards for consumers with no credit history or prior credit issues, providing an opportunity to establish or rebuild credit. This credit card product also allows consumers without a U.S. tax identification number to establish a credit history. The bank extended 4,048 secured credit cards totaling \$19.3 million during the review period.

COMMUNITY DEVELOPMENT LENDING

EWB is a leader in making community development loans, demonstrating excellent responsiveness to the local needs within its assessment areas. Specifically, the bank extended 1,453 community development loans totaling more than \$7.1 billion throughout its assessment areas and 409 loans totaling \$2.8 billion that benefited various broader statewide areas that include at least one of the bank's assessment areas. Overall, community development lending was generally consistent with the bank's presence in each market. The community development loans extended helped address various community and credit needs, including the revitalization or stabilization of certain geographies and the provision of affordable housing. Substantial loan origination volumes also supported economic development by financing small businesses, which helped to create or retain jobs for low- and moderate-income individuals within the assessment areas. Other loans supported non-profit organizations that provide essential social services to low- and moderate-income families and households, another identified need given the prevalence of poverty within the bank's assessment areas.

Investment Test

EWB's performance under the investment test is outstanding. The bank made excellent levels of qualified community development investments, often in a leadership position, that demonstrated excellent responsiveness to the community development needs of its assessment areas. Overall, the bank held over \$1.6 billion in community development investments during the review period.

More specifically, the bank held \$1.2 billion in community development investments and grants directly within its assessment areas, consisting of\$585.7 million in current period investments and donations and \$610.6 million in prior period investments that remain on its books. The bank held \$429.2 million in broader statewide or regional areas that also benefited its assessment areas, consisting of \$298.5 million in current period investments and \$130.7 million in prior period investments still on the bank's books. Investments were made predominantly in the state of California, where the majority of the bank's branches are located, and primarily served to address the critical need of affordable housing through investment in low-income housing tax credit (LIHTC) projects, and investments in mortgage-backed securities (MBS) where the underlying mortgages were made to low- or moderate-income borrowers. The distributions of these investments can be found on Tables 50, 65, 92, 107, 122, 137, and 152.

EWB made a broad array of investments, the vast majority of which were in securities backed by mortgage loans that helped to develop or maintain affordable housing units for low- and moderate-income borrowers, which met a stated credit and community need. The bank made extensive use of innovative and complex investments, to include investments in LIHTC projects and new market tax credits (NMTC) investments. EWB's investment activity facilitated the development or rehabilitation of affordable housing complexes and supported the needs of low- and moderate-income individuals or geographies, and funds also targeted to the needs of small businesses.

Investments benefitting a broader statewide or regional area that include one of the bank's assessment areas, along with specific activities benefiting only individual assessment areas, are addressed under their respective portions of the evaluation.

Service Test

EWB's performance under the service test is high satisfactory. Retail banking services are reasonably accessible to the bank's assessment areas. Branch hours and services do not vary in a way that inconveniences portions of the bank's assessment areas, including geographies and individuals of different income levels. In addition, the bank provided a relatively high level of community development services in most assessment areas, with a notable level of services provided in areas where the bank maintains only a limited presence.

RETAIL BANKING SERVICES

EWB's delivery systems are reasonably accessible to essentially all portions of its assessment areas and do not vary in a way that inconveniences portions of those areas. The bank's full range of products and services are generally available at all branches. Many branches are open on Saturdays and Sundays with several grocery store branches also offering extended evening hours. Other delivery systems, such as automated teller machines (ATM), telephone banking, and online banking, effectively provide customers with access to banking services after normal business hours. In addition, the bank offers a number of convenient services to its customers, including the following:

 East West Community Checking – These accounts are for qualified customers who reside in lowand moderate-income census tracts. The account is designed for individuals who might not otherwise be able to obtain banking services. These accounts feature a low-opening balance (\$25), no monthly maintenance fee, and unlimited check writing without per-check charges.

- Branch staff who speak languages that reflect the demographics of their communities, providing greater access to banking services for those who do not speak English. Languages include Spanish, Armenian, Vietnamese, Tagalog, Korean, and a variety of Chinese dialects.
- Internet and online banking websites that provide banking information in English, Chinese, Simplified Chinese, and Spanish.
- Telephone inquiry available 24 hours a day in English, Cantonese, Mandarin, Spanish, and Vietnamese.
- Low-fee remittance services to a variety of countries.
- Secured credit card accounts to help customers build or rebuild sound credit histories.
- Bank accounts that can be opened with alternative forms of identification.
- Foreign currency services.

A consolidation of the bank's branch network during the review period resulted in the closure of seven branches, including two branches in low-income census tracts, one branch in a moderate-income census tract, three branches in middle-income census tracts, and one branch in an upper-income census tract. EWB did not open any branches during the same period. Overall, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems to individuals of different income levels across its assessment areas.

COMMUNITY DEVELOPMENT SERVICES

Bank employees provided a relatively high level of community development services that were responsive to the community development needs in its assessment areas. During the review period, employees provided 9,975 hours of community development services to a variety of organizations directly within its assessment areas. Services offered were primarily focused on hosting financial education seminars for individuals and providing technical assistance to small businesses on a variety of topics. Financial expertise was also provided to community-based organizations by serving on their boards of directors and other committees. Bank employees also offered free income tax preparation services for low- and moderate-income communities within their assessment areas. While the vast majority of service hours benefited the California assessment areas, notable service hours were also provided in the markets where the bank has only a limited presence. Activities specific to individual assessment areas are discussed in their respective sections of this evaluation.

Fair Lending or Other Illegal Practices Review

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB, among other things, primary supervisory authority over insured depository institutions with total assets of more than \$10 billion when assessing compliance with the requirements of Federal consumer financial laws. The Federal Reserve Bank of San Francisco (Reserve Bank), however, retains authority to enforce EWB's compliance with the CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation from January 1, 2020, through December 31, 2023, the Reserve Bank did not cite violations involving discriminatory or other illegal credit practices that adversely affected the Reserve Bank's evaluation of the bank's CRA performance. As of the date of this report, the Reserve Bank is unaware of any violations of the Equal Credit Opportunity Act, Regulation B, or Unfair, Deceptive, or Abusive Acts or Practices identified by the CFPB.

East West Bank
Pasadena, California
CRA Public Evaluation
August 12, 2024

STATE OF CALIFORNIA

CRA Rating for California

Performance in California is rated "Outstanding"

The lending test is rated:

Outstanding

The investment test is rated:

Outstanding

The service test is rated:

High Satisfactory

The major factors supporting the institution's rating include:

- Lending levels that reflect excellent responsiveness to assessment area credit needs with a substantial majority of loans made within the bank's assessment areas.
- Excellent distributions of loans by geography and among businesses of different revenue sizes.
- Extensive use of innovative and/or flexible lending practices in serving assessment area credit needs.
- Partnerships with non-profit organizations and special credit programs that enhanced the bank's lending performance. Excellent levels of qualified investments and grants that addressed the need for economic development and affordable housing, as well as other needs.
- Reasonable access to retail banking services and relatively high levels of community development services provided across the bank's assessment areas.

Scope of Examination

The scope of the examination for the State of California is consistent with the overall scope of the CRA examination. As previously noted, EWB has four assessment areas in California – Southern California, Bay Area, Sacramento, and San Diego. The Southern California and Bay Area assessment areas received full-scope reviews, while the Sacramento and San Diego assessment areas received limited scope reviews due to the bank's limited presence and lower level of activity in those areas. The Southern California assessment area carried the greatest weight in the overall assessment of California because of its greater branch presence, larger share of deposits, and higher loan volumes.

All loan types were considered as part of the lending test evaluation. However, in some instances, lending levels were insufficient to draw meaningful conclusions. While these loans were considered and are presented in the tables in Appendix E, they did not influence the overall assessment. In addition, as stated previously, EWB employs alternative credit standards to meet the needs of its immigrant client base and does not routinely collect borrower income information. As such, the lending test evaluation was based only on the following:

- All loan types were used to evaluate the responsiveness to assessment area credit needs based on the volume of lending within each assessment area.
- Small business loans were evaluated for geographic and borrower revenue distributions in the Southern California and Bay Area assessment areas.
- Home purchase loans were evaluated for geographic distributions in each of the four California assessment areas.

- Home mortgage refinance loans were evaluated for geographic distributions in the Southern California, Bay Area, and San Diego assessment areas.
- Home improvement loans were evaluated for geographic distributions in the Southern California and Bay Area assessment areas.
- Multi-family loans were evaluated for geographic distributions in the Southern California and Bay Area assessment areas.

Description of Operations in California

California is EWB's predominant market, and the bank maintains a relatively small presence in the state. As of June 30, 2024, the bank operated 70 branches within its four assessment areas located in California. At that time, 87.6 percent of deposits occurred in the California assessment areas.¹ California is a highly competitive market for financial services with a strong presence of national, regional, and nonbank lenders. There were 181 Federal Deposit Insurance Corporation (FDIC)-insured institutions operating branch offices in California with combined deposits totaling \$1.8 trillion as of June 30, 2024.² The market was dominated by three large national banks that together held over 56 percent of deposits.³ EWB had a relatively small presence in California, ranking 7th in total deposits representing a market share of 2.8 percent with deposits of \$49.9 billion.⁴

The review period in California was characterized by the area's ongoing recovery from the 2019 Coronavirus Disease (COVID-19) pandemic. California was at risk of recession early in the review period and struggled to make traction. The state's economy faced a challenging recovery due to significant disruptions from the pandemic, natural disasters, and longstanding structural issues such, as low housing affordability, persistent income inequality, and concentrated poverty levels in certain areas. The state's heavy reliance on industries like tourism, technology, agriculture, and trade left it particularly vulnerable to both global and local economic shocks.⁵

The pandemic highlighted California's economic vulnerabilities, with its large tourism and hospitality sectors facing major challenges due to travel restrictions and business closures. Leisure and hospitality employment in particular lagged behind the national recovery, with less than 65 percent of jobs recouped, even as the industry in other states surpassed 80 percent recovery. The technology sector was initially resilient, as many firms expanded to facilitate the rise of remote work; however, the industry faced headwinds in later stages as venture capital funding declined, and large-scale layoffs began to occur. California's employment recovery was supported by the logistics industry, as the rise of e-commerce drove demand for transportation and warehousing jobs. However, the jobs created were predominantly low-wage positions and were largely overshadowed by the loss of higher-paying industries, like technology and professional services.

3 Ibid.

Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2023; available from: https://banks.data.fdic.gov/bankfind-suite/SOD.

² Ibid.

⁴ Ibid

Moody's Precis Report, California, March 2020.

⁶ Moody's Precis Report, California, November 2021.

Moody's Precis Report, California, November 2022.

⁸ Moody's Precis Report, California, March 2021.

Moody's Precis Report, California, March 2022.

Housing affordability, which has been a long-standing issue in California, worsened during the review period. Home prices surged due to limited inventory and increased demand, driving more low- and midwage earners out of the state. ¹⁰ Population loss became a persistent trend, with the state experiencing consecutive years of negative net migration, particularly among middle-income residents seeking more cost-effective living options elsewhere. ¹¹

Natural disasters compounded economic challenges, with California enduring its most destructive wildfire seasons on record during the review period. Fires destroyed thousands of structures, caused billions in damages, and disrupted key industries like agriculture and tourism. ¹² Climate-related risks, including persistent droughts and water scarcity, weighed heavily on the agricultural sector. Though heavy precipitation in later years provided much needed relief, long-term water management and climate change remain critical concerns. ¹³

Based on the data referenced above, as well as input from community contacts discussed below within each assessment area analysis, high housing costs and a lack of affordable housing remain significant challenges in the state. In addition, recovery from the economic challenges discussed above present a number of credit needs for small businesses, also discussed further in each assessment area analyses to follow.

Conclusions with Respect to Performance Tests in California

Conclusions regarding EWB's performance in California with respect to the lending, investment, and service tests are the same as the overall conclusions for the bank as a whole. In total, 87.6 percent of deposits and 69.3 percent of CRA and HMDA reportable loan originations occurred within the state. As a result, the overall conclusions in this report were heavily influenced by the performance in the California markets. The following sections of this report contain specific comments regarding the individual assessment areas within California, noting any differences in performances among the areas.

In addition to the assessment area specific activity, EWB engaged in community development lending and investment activities within California that were outside of any of its designated assessment areas but remained in broader statewide or regional areas that included at least one of the bank's assessment areas. As previously mentioned, these activities were considered in the bank's overall performance assessment because the bank adequately engaged in qualified activities addressing the needs of its assessment areas.

With regard to community development lending, over \$825.5 million in community development loans either benefited a broader statewide or regional area that includes one of the California assessment areas. Notable examples of community development loans that benefit broader statewide areas include the following:

 A \$9.8 million loan that helped to finance the acquisition and rehabilitation of a LIHTC project located in a moderate-income geography that provided 46 single family residences for low-

Moody's Precis Report, California, November 2021.

¹¹ Moody's Precis Report, California, March 2024.

Moody's Precis Report, California, November 2020.

¹³ Moody's Precis Report, California, March 2023.

income individuals and families. All units are reserved for those earning less than 50 percent of area median income.

- A \$4.8 million loan to support a small business by financing the purchase of a gas station and service center, retaining permanent jobs for 10 low- and moderate-income workers.
- A \$2.3 million loan that served as working capital for a small business that helped to retain permanent jobs for 200 employees that were primarily in low- or moderate-income positions.
- A \$1.3 million loan to refinance a multifamily residential property located in a moderate-income census tract. The property provides 13 units of affordable housing for low- and moderateincome individuals and families.

Similarly, \$272.6 million in qualified investments benefited a broader statewide or regional area that includes the California assessment areas. Of these, \$62.7 million remained on the bank's books from a prior period, and \$209.9 million were new investments. While these investments served larger areas, many also had a direct and significant impact within one or more of the bank's assessment areas.

EWB played a leadership role in qualified community development investment activity, including through engagement in the Department of Housing and Urban Development's LIHTC program and providing funding as either the lead or sole investor. The following are notable examples of these statewide or regional investments, including those where the bank demonstrated leadership.

- A \$20.4 million investment in a LIHTC project that provided 93 affordable housing units for lowincome individuals and families within the state of California. The property is located in Placer County, California.
- A \$13.4 million investment in a LIHTC project that funded the development of a 72-unit apartment building, of which 71 units were rent-restricted to 30 percent of the area median income. The property is located in Kern County, California.
- A \$14.5 million investment in a LIHTC project that provided 122 affordable housing units for senior citizens, targeting those with less than 60 percent of area median income. The property is located in Contra Costa County, California.
- A \$8.9 million investment in a LIHTC project that provided 48 units of affordable housing units for low-and moderate-income individuals and families within an upper-income geography, allowing low- and moderate-income families to access better quality schools, job opportunities, and transportation typically found in these neighborhoods. The property is located in Imperial County, California.

Southern California Assessment Area Conclusions

*For each assessment area where a full-scope review was performed using the examination procedures.

DESCRIPTION OF OPERATIONS IN SOUTHERN CALIFORNIA

The Southern California assessment area consists of Los Angeles, Orange, and San Bernardino counties in their entirety. Los Angeles and Orange counties are part of the Los-Angeles-Long Beach-Anaheim MSA. San Bernardino County is part of the Riverside-San Bernardino-Ontario MSA. As of July 1, 2023, the three-county assessment area was home to an estimated 15 million people.¹⁴

EWB operated 46 of its 98 total branches in the Southern California assessment area, which together held deposits totaling \$43 billion as of June 30, 2024. By comparison, there were a total of 107 FDIC-insured financial institutions operating 1,968 offices in the area with deposits totaling over \$667 billion. BWB ranked fifth in the market, with 6.4 percent of the deposit market share.

Exhibit 4 below presents key demographic and business information used to help develop a performance context for the assessment area.

Ехнівіт 4										
ASSESSMENT AREA DEMOGRAPHICS SOUTHERN CALIFORNIA ASSESSMENT AREA										
Income Categories	Tract Dis		Families by Tract		Families < Poverty Level as % of Families by Tract		Families by Family Income			
	#	%	#	%	#	%	#	%		
Low	207	5.8	165,279	4.8	46,989	28.4	815,577	23.7		
Moderate	1,010	28.2	944,849	27.4	152,078	16.1	576,155	16.7		
Middle	1,098	30.7	1,089,969	31.7	91,173	8.4	625,569	18.2		
Upper	1,175	32.8	1,225,745	35.6	48,851	4.0	1,426,032	41.4		
Unknown	88	2.5	17,491	0.5	2,437	13.9	0	0.0		
Total AA	3,578	100.0	3,443,333	100.0	341,528	9.9	3,443,333	100.0		
				Н	ousing Type	by Tract				
	Housing Units by	Ov	vner-occupie	d	Ren	tal	Vacant			
Trac	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit		
Low	265,241	39,334	1.6	14.8	206,989	78.0	18,918	7.1		
Moderate	1,417,291	462,602	18.4	32.6	863,279	60.9	91,410	6.4		

¹⁴ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2023; available from: www.census.gov/quickfacts/.

Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2024; available from: https://banks.data.fdic.gov/bankfind-suite/SOD.

¹⁶ Ibid.

¹⁷ Ibid.

Middle	1,666,324	823,908	32.8	49.4	734,862	44.1	107,554	6.5	
Upper	1,968,839	1,179,248	46.9	59.9	646,437	32.8	143,154	7.3	
Unknown	64,715	9,382	0.4	14.5	46,554	71.9	8,779	13.6	
Total AA	5,382,410	2,514,474	100.0	46.7	2,498,121	46.4	369,815	6.9	
				Bu	sinesses by Ti	ract & Reve	enue Size		
	Total Businesses by Tract		Less Tha \$1 Mi		Over \$1	Million	Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	28,015	3.6	25,426	3.5	2,446	4.2	143	3.0	
Moderate	159,983	20.3	145,722	20.1	13,479	23.4	782	16.6	
Middle	228,311	29.0	209,371	28.9	17,701	30.7	1,239	26.3	
Upper	353,093	44.9	329,073	45.4	21,598	37.4	2,422	51.4	
Unknown	17,747	2.3	15,133	2.1	2,489	4.3	125	2.7	
Total AA	787,149	100.0	724,725	100.0	57,713	100.0	4,711	100.0	
Percent	tage of Total	Businesses:		92.1		7.3		0.6	
				ı	Farms by Tract & Revenue Size				
	Total Farn	ns by Tract	Less Tha \$1 Mi				Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	60	2.1	59	2.1	1	1.0	0	0.0	
Moderate	468	16.3	444	16.0	24	23.5	0	0.0	
Middle	744	25.8	716	25.8	28	27.5	0	0.0	
Upper	1,566	54.4	1,517	54.6	49	48.0	0	0.0	
Unknown	42	1.5	42	1.5	0	0.0	0	0.0	
Total AA	2,880	100.0	2,778	100.0	102	100.0	0	0.0	
Pe	rcentage of T	otal Farms:		96.5		3.5		0.0	

Source: 2023 FFIEC Census Data, 2023 Dun & Bradstreet Data, 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Economic Conditions

Similar to the State of California, the Southern California assessment area was in a state of economic recovery for a majority of the review period. The area economy experienced a slow and uneven recovery due to lingering effects of the pandemic, long-term economic challenges, and shifting population trends. While there were steady employment gains across various sectors within the assessment area, the area's overall recovery generally lagged behind national trends due to its reliance on vulnerable industries.

Los Angeles County's economic recovery was generally slower than the national average. ¹⁸ The Los Angeles area plays a pivotal role in the U.S. supply chain, as the area contains two ports that together form the nation's largest port complex. ¹⁹ As such, transportation and warehouse employment is critical to the area economy. While cargo volume was robust early in the review period, the industry was challenged by tense employee contract negotiations, logjams caused by container shortages and delays from Asian ports, and waves of COVID-19 variants that resulted in weak consumer confidence and shifts in spending from goods to services. ²⁰²¹

Overall, demand for goods from both consumers and businesses resulted in steady employment gains during the review period.²² Large-scale shifts to remote working postures presented major challenges for commercial real estate and consumer services in the Los Angeles area, as office-using employment experienced outsized declines. By November of 2021, the nation as a whole had nearly returned to prepandemic levels; however, office use in Los Angeles was eight percent below national benchmarks. Many companies in the Los Angeles Area embraced hybrid work arrangements, significantly reducing the demand for office space, which had a ripple effect on nearby businesses. Also, by November 2021, the leisure and hospitality sector had regained only 60 percent of the jobs lost from the pandemic, while the nation had recouped 80 percent.²³

The healthcare sector emerged as the most reliable source of job growth in the later years of the review period. Los Angeles is home to some of the nation's premier hospitals that are actively advancing medical knowledge and innovation. Gains in healthcare were fueled by patients from across the nation who travel to the area for medical purposes, particularly from the western U.S., which contains some of the fasted growing populations in the country. Los Angeles County experienced poor demographic trends during the review period, with year-after-year population losses due to more residents leaving than arriving and slowing immigration. Population loss has resulted in a shrinking labor force and less demand for consumer goods. Additionally, although housing prices declined due to limited supply and rising interest rates, affordability remains a major challenge for many in the assessment area, and prices remain out of reach for many households.

In Orange County, tourism is a vital sector due to its world-renowned attractions. Disney Resorts, for example, is the largest employer in the area, and the leisure and hospitality sector accounts for a significant source of employment, which leaves the area with heightened exposure to consumer trends.²⁸ The resurgence of local and international travel during the review period helped to bolster the local economy but was slow and inconsistent, as consumer sentiment was consistently impacted by waves of COVID-19 resurgence, high gasoline prices, elevated interest rates, stubborn inflation, and decreasing nominal wage growth.²⁹ By the end of the review period, consumer sentiment had yet to

¹⁸ Moody's Precis Report, Los Angeles-Long Beach-Glendale, CA, November 2021.

¹⁹ Moody's Precis Report, Los Angeles-Long Beach-Glendale, CA, May 2022.

²⁰ Ibid.

²¹ Moody's Precis Report, Los Angeles-Long Beach-Glendale, CA, November 2021.

²² Moody's Precis Report, Los Angeles-Long Beach-Glendale, CA, November 2023.

Moody's Precis Report, Los Angeles-Long Beach-Glendale, CA, November 2021.

²⁴ Moody's Precis Report, Los Angeles-Long Beach-Glendale, CA, November 2023.

²⁵ Ibid.

²⁶ Ibid.

²⁷ Moody's Precis Report, Los Angeles-Long Beach-Glendale, CA, November 2022.

²⁸ Moody's Precis Report, Anaheim-Santa Ana-Irvine, CA, May 2024.

²⁹ Moody's Precis Report, Anaheim-Santa Ana-Irvine, CA, November 2023.

rebound to pre-pandemic levels, and inflation remained a headwind.³⁰ Similar to Los Angeles County, the rise of remote work had a significant impact on Orange County's commercial office space and consumer services, as the area has one of the highest concentrations of office-using employment in the country.³¹ While workers were slow to return to the office, not all firms closed operations entirely, which indicates that Orange County remains and attractive area for companies, even amid shifting work preferences.³² The area's technology sector weathered broader industry downturns, as layoffs in Orange County were less common than other areas of California, and job losses were relatively quickly recouped.³³

The primary economic drivers in San Bernardino County are logistics, healthcare, and defense. The logistics industry led growth through 2021, as transportation and warehousing employment surged to compensate for soaring consumer demand for goods.³⁴ Because San Bernardino is located near several large population centers, major highways, and the two largest ports in the nation, it is a prime logistics hub with lower costs than other regions in California.³⁵ By 2022, growth in logistics had slowed; however, online shopping trends are anticipated to ensure that logistics remains a strength of the local economy.

Healthcare also proved a crucial source of employment gains, as San Bernardino County regularly attracted residents from other areas during the review period, unlike many other California regions. ³⁶ Population inflows provide both demand for medical services and a growing labor force, which create more opportunities for economic expansion than other large metro areas. ³⁷

Defense spending also contributed to the health of San Bernardino's economy, as defense allocations were steady and consistently increasing.³⁸ Due to multiple military installations located in the area, the military employs a higher than usual percentage of the local population. These installations regularly bring defense dollars, and increased military personnel and their families provide much needed support for local consumer industries.³⁹

Census data show that between 2015 and 2020, median family income increased across the assessment area; however, a majority of the markets in the area lagged behind growth of the state as a whole. While incomes in Los Angeles County exceeded the state average by nearly one percent during that period, Orange and San Bernardino counties lagged behind, falling below the statewide figure. Exhibit 5 on the following page reflects the change in median family income that occurred in the assessment area and the State of California during that timeframe.

Moody's Precis Report, Anaheim-Santa Ana-Irvine, CA, May 2024.

Moody's Precis Report, Anaheim-Santa Ana-Irvine, CA, November 2021.

Moody's Precis Report, Anaheim-Santa Ana-Irvine, CA, November 2023.

Moody's Precis Report, Anaheim-Santa Ana-Irvine, CA, May 2024.

Moody's Precis Report, Riverside-San Bernardino-Ontario, CA, November 2021.

Moody's Precis Report, Riverside-San Bernardino-Ontario, CA, November 2022.

Moody's Precis Report, Riverside-San Bernardino-Ontario, CA, November 2022.

³⁷ Ihid

Moody's Precis Report, Riverside-San Bernardino-Ontario, CA, May 2024.

³⁹ Moody's Precis Report, Riverside-San Bernardino-Ontario, CA, November 2022.

EXHIBIT 5 MEDIAN FAMILY INCOME CHANGE ASSESSMENT AREA: SOUTHERN CALIFORNIA									
Area 2015 Median Family Income 2020 Median Family Income Percent Chang									
Los Angeles County, CA	\$68,508	\$80,317	17.2%						
Orange County, CA	\$93,965	\$106,451	13.3%						
San Bernardino County, CA	\$64,553	\$72,465	12.3%						
State of California	\$77,267	\$89,798	16.2%						

Source: 2011 - 2015 U.S. Census Bureau American Community Survey

2016 - 2020 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

The unemployment rate of the area increased sharply due to the economic turmoil brought on by the pandemic; however, the recovery generally kept pace with the recovery of California as a whole. Exhibit 6 below reflects the unemployment rates of the assessment area and the state between 2018 and 2022.

EXHIBIT 6 UNEMPLOYMENT RATES ASSESSMENT AREA: SOUTHERN CALIFORNIA									
Area 2018 2019 2020 2021 202									
Los Angeles County, CA	4.6%	4.5%	12.3%	8.9%	4.9%				
Orange County, CA	3.0%	2.8%	8.9%	6.0%	3.2%				
San Bernardino County, CA	4.1%	3.9%	9.6%	7.4%	4.1%				
State of California	4.2%	4.1%	10.1%	7.3%	4.2%				

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

The cost burden for renters and owners indicates a need for affordable housing in the assessment area, as most low- and moderate-income renters and owners are spending 30 percent or more of their household income on housing. Affordable housing options for low-income populations in particular were scarce, and a majority of low- and moderate-income renters in the assessment area and the state are considered cost burdened. Exhibit 7 below reflects the percentages of cost burdened renters and owners within the assessment area and statewide.

EXHIBIT 7 HOUSING COST BURDEN ASSESSMENT AREA: SOUTHERN CALIFORNIA								
Cost Burden - Renters Cost Burden - Owners								
	Low Moderate All Low Moderate A							
Area	Income	Income	Renters	Income	Income	Owners		
Los Angeles County, CA	80.9%	46.5%	52.4%	67.7%	47.4%	33.4%		
Orange County, CA	83.0%	55.1%	51.2%	63.9%	46.2%	29.5%		
San Bernardino County, CA	83.3%	57.0%	51.8%	64.8%	46.0%	28.7%		
State of California	80.6%	52.0%	49.5%	65.8%	46.4%	29.3%		

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

The growth of small business loan volume within the assessment area experienced shifts during the review period but generally outperformed statewide trends. Within the assessment area and statewide, small business loan growth moderated in 2020 from prior year levels, although increases in small business lending in the area outweighed the state average in 2021, with average increases of 16.9 percent, as compared to the state average of 13.5 percent. Particularly strong gains were made in San Bernardino County. Lending to small businesses is critical for the support of the local economy given that small businesses represented at least 92.1 percent of all businesses in the assessment area, as reflected in Exhibit 4 above. Exhibit 8 below reflects small business loans originated by financial institutions in the assessment area and the State of California from 2017 through 2021.

EXHIBIT 8 SMALL BUSINESS LOAN TRENDS									
ASSESSMENT AREA: SOUTHERN CALIFORNIA									
Area 2017 2018 2019 2020 2021									
Los Angeles County, CA	298,116	330,693	354,890	365,864	427,499				
Orange County, CA	107,326	121,388	127,904	133,695	148,878				
San Bernardino County, CA	38,035	42,688	47,440	48,962	60,023				
State of California	961,046	1,072,551	1,146,375	1,182,917	1,342,194				

Source: Federal Financial Institutions Examination Council (FFIEC) Community Reinvestment Act Aggregate Data

Mortgage loan origination within the assessment area experienced significant disruptions during the review period and generally lagged the statewide average. The largest growth by number of loans occurred in Orange County in 2020, with an increase of 91,975 mortgage loans (111.4 percent) from the previous year. During that same timeframe, mortgage loans in the State of California increased by 857,052 mortgage loans (83.8 percent), before reversing course in 2021 and 2022. Decreases in mortgage lending in the assessment area in later years kept pace with statewide trends. Exhibit 9 below reflects mortgage loans originated by financial institutions in the assessment area and the State of California during the period of 2018 through 2022.

EXHIBIT 9 HOME MORTGAGE TRENDS									
ASSESSMENT A	ASSESSMENT AREA: SOUTHERN CALIFORNIA								
Area 2018 2019 2020 2021 2022									
Los Angeles County, CA	134,959	194,741	355,831	363,466	125,663				
Orange County, CA	53,780	82,537	174,512	155,019	45,750				
San Bernardino County, CA	45,085	59,972	101,283	109,154	44,955				
State of California	711,925	1,022,475	1,879,527	1,874,900	652,918				

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act Loan/Application Records

Credit and Community Development Needs

The economic data described above and feedback from community contacts indicate that there remains credit and community development needs in the area. Due to the high rents and home prices noted above, affordable housing remains a critical need. One contact indicated that concerns over the lack of affordable housing persist, even considering recent decreases in housing prices in some parts of the area. The median home price in prominent sections of the assessment area leave homebuying out of

reach for many families and first-time homebuyers, according to the contact. The contact also indicated that additional services for low- and moderate-income populations are in critical need, including credit products with less restrictive credit score requirements. Many low-income individuals demonstrate the ability to service debt, but low credit scores are preventing access to credit. Local community organizations are also in need of capital, as many low- and moderate-income individuals turn to these types of organizations when credit is not accessible through traditional banking channels. These community organizations tend to have low foreclosure rates, largely due to the additional services they provide, such as counseling, and the fundamental understanding of the unique credit needs and financial circumstances of the low- and moderate-income populations within their communities. The contact also referenced a need for of innovative lending practices to address the need for affordable housing, including the financing accessory dwelling units and the use of flexible terms.

Another community contact in the assessment area indicated that the high cost of living, with particular attention to housing costs, is making it difficult for small businesses to obtain workers who can afford to live in the area. Many small businesses in the area are unable to operate to full capacity due to the lack of workers, cost of goods, and high lease payments. The primary credit needs of small businesses include fixed, low-rate loans with longer terms. The contact also indicated that there are opportunities for financial institutions to get more involved with small business financial literacy training and education, including offering industry-specific education. Lastly, the contact indicated that financial institutions should consider providing pass-through grants to small businesses for technology and equipment, whereby an organization receives grant money and distributes it to eligible small businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTHERN CALIFORNIA

Lending Test

EWB's performance under the lending test in Southern California is outstanding. The bank is a leader in making community development loans and exhibited an excellent record of serving the credit needs of low-income individuals and areas and very small businesses. EWB also demonstrated excellent geographic lending distributions and excellent penetration among commercial borrowers of different revenue sizes.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs. The majority of the bank's lending activity is conducted in the Southern California assessment area for all product types. During the review period, the bank originated over 45,000 CRA and HMDA-reportable loans in the assessment area. As shown on Table 1 in Appendix E, the percentage of loans originated in Southern California was generally consistent with the percentage of area deposits taken in those areas. EWB's lending data and assortment of loan programs evidence active efforts to meet the credit needs of its communities located in Southern California.

Lending Distribution by Geography

Overall lending distributions by geography are excellent. The bank's performance was largely driven by excellent distributions of small business loans. While lending volume and performance varied by product type, the bank extended loans within geographies of each income category, demonstrating strong

overall performance in low- and moderate-income areas. Lending patterns followed the locations of EWB branches and business or housing unit concentrations and did not exhibit unusual or conspicuous gaps. Performance was enhanced by the bank's flexible and innovative loan products, as well as partnerships with non-profit organizations that support very small businesses and low- and moderate-income borrowers.

Small Business Lending

The geographic distribution of small business loans within the Southern California assessment area is excellent. As shown on Tables 2 and 3 in Appendix E, the bank's levels of small business lending were particularly strong in both low- and moderate-income geographies for the entirety of the review period. The bank's lending far exceeded aggregate lending in both the number of loans and dollar amount, as well as the percentage of small businesses located in those areas.

Home Mortgage Lending

Geographic distributions among home mortgage loans in Southern California are good overall. Lending was distributed throughout the assessment area with no conspicuous lending gaps, and loans were made within each of the income categories. Mortgage lending distributions and comparative data used in this assessment are presented on Tables 4 and 6 in Appendix E.

The geographic distribution of home purchase loans is adequate. Home purchase loans reflect adequate penetration throughout the assessment area for the duration of the review period with the exception of 2021, where penetration in low- and moderate-income census tracts was good. Overall, EWB performed adequately in low-and moderate-income geographies, where lending was comparable but generally lower than owner-occupied units and the performance of aggregate lenders. As seen in Tables 4 and 6, lending levels generally followed the concentration of owner-occupied units and the bank's branch locations in middle- and upper-income census tracts.

The geographic distributions of home mortgage refinance loans are excellent overall, primarily driven by lending in 2020 and 2021. Overall, lending generally exceeded the performance of aggregate lenders in low-and moderate-income geographies and the percentage of owner-occupied housing units.

Home improvement lending distributions by geography are good, with notable performance in 2020 and 2021. Likewise, multi-family lending distributions by geography are also good with relatively high percentages of lending in low- and moderate-income areas that exceed the percentage of multi-family units and performance of aggregate lenders. EWB's multi-family lending is particularly responsive to the need for affordable rental units among low- and moderate-income individuals.

Lending Distribution by Business Revenue

Distributions of credit among businesses of different revenue sizes reflect excellent distributions among businesses of different revenue sizes. As previously noted, performance was based on the distribution of loans to small businesses, as a substantial majority of mortgage loans extended by the bank did not consider borrower income in the credit decision process. The overall performance was enhanced by the bank's flexible and innovative loan products and services and partnerships with non-profit organizations that serve very small businesses, including women-owned businesses.

Small Business Lending

The distribution of small business loans among businesses of different sizes is excellent. Lending levels to small businesses is well above aggregate lender performance, as demonstrated through small business lending patterns over the entirety of the review period. The bank also made a good number of loans in small dollar amounts, which met an identified credit need within the assessment area. Data used for this assessment can be seen on Tables 8 and 9 in Appendix E.

Community Development Lending

EWB is a leader in making community development loans in Southern California. The bank made 942 loans totaling \$4.4 billion during the review period. This volume is comparatively higher than other peer institutions, as well as EWB's prior performance, even though the current review period is shorter than that of the prior examination. The majority of the community development loans are concentrated in Los Angeles County, but a good number were also made in San Bernardino and Orange counties. Data regarding community development lending volumes in California is displayed on Table 1 in Appendix E.

The bank's lending comprised a good variety of responsive community development activities. Most of the loans provided critical support to small businesses and helped to revitalize or stabilize certain geographies within the assessment area, followed by loans that financed community services for low-and moderate-income individuals and loans that financed the development of much needed affordable housing units. Notable community development loans in the Southern California assessment area include the following:

- A \$22 million loan to provide working capital to an importer and wholesaler of bedding products located in the assessment area. The company qualified as a small business per the Small Business Administration's North American Industry Classification System (NAICS) codes. The loan helped the company retain its 500 employees, a majority of whom are low- and moderateincome individuals.
- A \$15 million loan used as working capital by a non-profit organization with the primary mission of alleviating poverty, achieving racial equity, and promoting economic mobility in diverse lowincome communities.
- A \$11.7 million loan that helped to revitalize and stabilize a moderate-income geography by facilitating the conversion of office space into a mixed-use facility in association with a broader redevelopment plan.
- A \$10 million loan that helped to revitalize and stabilize a moderate-income geography within the assessment area by providing working capital to a longstanding business that employs 247 individuals.
- A \$9 million loan used as working capital by a nonprofit organization located in a low-income area that provides mental health and other critical services to children and families residing in high-need communities.

Investment Test

EWB's performance under the investment test in Southern California is outstanding as evidenced by a high level of qualified investments and grants, coupled with a strong focus on the area's critical need for affordable housing. Investments also helped spur economic development by providing financing to local small businesses. As seen on Table 34, \$336.9 million was invested in Southern California. This total includes \$193.9 million in new investments and \$143 million in prior-period investments that remained on the bank's books. During the review period, investments were made in LIHTC and MBS that directly benefit the assessment area by developing or maintaining affordable housing for low- and moderate-income individuals and families. Overall, 13,923 affordable housing units were supported by investment activity conducted during the review period. Grants and donations were also provided to numerous organizations involved in a variety of community development activities. The following are notable examples of the bank's qualified community development investment activities:

- A \$43.5 million investment into a fund that finances multiple LIHTC projects across the state of California. The bank's investment helped to develop 2 affordable housing complexes inside the assessment area, consisting of 132 rent-restricted housing units for low- and moderate-income individuals and families.
- A \$15 million investment in a fund that provided financing for several LIHTC projects that provided a total of 276 units of affordable housing for low- and moderate-income individuals and families, including senior citizens, within the assessment area.
- A \$5.9 million investment in a LIHTC project that provided 84 rental housing units for individuals and families earning less than 60 percent of area median income, including 8 units reserved for the homeless.
- A \$26.9 million investment into a New Market Tax Credit fund that provided support for several economic development projects within the bank's assessment area.

Service Test

EWB's performance in the service test in Southern California is high satisfactory based on the accessibility of delivery systems and the relatively high level of community development services provided to the assessment area.

Retail Banking Services

Retail banking delivery systems are reasonably accessible throughout the Southern California assessment area and business hours and services are tailored to convenience and needs of those area, including low- and moderate-income geographies and individuals. Branching activity did not adversely affect accessibility of delivery systems in the Southern California assessment area. A full array of personal and business banking products and services is offered at all locations, including at the ten branches situated in grocery stores. Branch hours are adjusted according to the needs of the community in which the branch is located. A substantial majority of branches offer Saturday and Sunday hours, and grocery store branches offer both Sunday and extended evening hours. In addition, delivery systems include 47 ATMs, online and mobile banking, and remote deposit capture that are available to provide customers with access to banking services after normal business hours.

As seen on Table 51, EWB operates 46 branches in Southern California, which represents 66 percent of branches within the state. During the review period, the bank closed four branches. These closures were attributable to the previously mentioned consolidation of existing EWB branches. One branch was located in a moderate-income census tract, and the remaining three were located in middle-income census tracts. These closures did not adversely affect availability of banking services to consumers given the close proximity of the closing branches to other EWB branches. Overall accessibility to banking services in low-and moderate-income census tracts is reasonable. EWB maintains 32.7 percent of its branches within low-and moderate-income census tracts, which is comparable to the percentage of households located in those areas at 31.4 percent.

Community Development Services

EWB employees provided a relatively high level of services in the Southern California assessment area. Employees provided over 250 services totaling more than 4,003 service hours. For 11 of the organizations served, employees held leadership positions as board and committee members. These qualified services met a variety of community development needs. The majority of the service hours were for personal financial education for low- and moderate-income students and families and SBA lending product presentations to small businesses. Significant numbers of service hours were expended toward FHLB affordable housing and community development grant programs. The following are notable examples of community development services:

- 38 bank employees provided a combined total of 304 service hours facilitating real-life financial simulations for over 200 students from surrounding Title 1 middle schools in the city of Compton. Simulations provided various financial lessons, providing students the ability to make informed financial decisions throughout their lives.
- 30 bank employees spent a combined total of 87 hours hosting an online webinar focused on explaining the various SBA programs and services available to small businesses within the bank's communities. The webinar was attended by 63 local small business owners.
- 11 bank employees provided a combined total of 108 hours assisting low- and moderate-income individuals in obtaining earned income tax credits by providing free income tax preparation services.
- 24 bank employees provided a combined total of 162 hours teaching virtual financial literacy
 principles to high school students, a majority of which qualified for the free and reduced lunch
 program. Topics included budgeting, credit management, investing, and financing higher
 education.

Bay Area Assessment Area Conclusions

DESCRIPTION OF OPERATIONS IN THE BAY AREA

The Bay Area assessment area consists of Alameda, San Francisco, San Mateo, and Santa Clara counties. Alameda County is a part of the Oakland-Berkeley-Livermore, California MD. San Francisco and San Mateo counties comprise the San Francisco-San Mateo-Redwood City, California MD. Santa Clara County is part of the San Jose-Sunnyvale-Santa Clara, California MSA. As of July 1, 2023, the four-county assessment area was home to an estimated five million people. 40 EWB operated 22 branches in the area,

⁴⁰ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2023; available from: www.census.gov/quickfacts/.

which held combined total deposits of \$6 billion as of June 30, 2024. 41 By comparison, there were a total of 70 FDIC-insured financial institutions operating 890 offices within the area, with deposits totaling over \$532.2 billion. 42 EWB ranked eleventh in the market, representing 1.12 percent of the deposit market share. 43

The following Exhibit 10 presents key demographic and business information used to help develop a performance context for the assessment area.

Exhibit 10 ASSESSMENT AREA DEMOGRAPHICS BAY AREA ASSESSMENT AREA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	100	8.3	73,993	6.2	12,538	16.9	278,308	23.4
Moderate	260	21.6	242,026	20.3	17,462	7.2	190,867	16.0
Middle	419	34.8	444,366	37.3	16,455	3.7	218,647	18.4
Upper	386	32.0	416,253	35.0	9,849	2.4	502,221	42.2
Unknown	40	3.3	13,405	1.1	1,617	12.1	0	0.0
Total AA	1,205	100.0	1,190,043	100.0	57,921	4.9	1,190,043	100.0
				Hous	ing Type by	Tract		
	Housing Units by	Owner-occupied		Rental		Vacant		
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	135,582	28,881	3.0	21.3	97,546	71.9	9,155	6.8
Moderate	390,864	163,225	17.0	41.8	206,454	52.8	21,185	5.4
Middle	715,306	363,790	37.9	50.9	311,947	43.6	39,569	5.5
Upper	668,101	396,821	41.3	59.4	227,240	34.0	44,040	6.6
Unknown	42,179	8,174	0.9	19.4	29,902	70.9	4,103	9.7
Total AA	1,952,032	960,891	100.0	49.2	873,089	44.7	118,052	6.0
				Busin	esses by Tra	ct & Revenu	ue Size	
		inesses by act Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	15,557	5.8	14,016	5.7	1,464	6.6	77	5.5
Moderate	45,084	16.8	41,155	16.8	3,752	16.9	177	12.7
Middle	90,048	33.5	82,580	33.6	7,014	31.6	454	32.7

Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2024; available from: https://banks.data.fdic.gov/bankfind-suite/SOD.

⁴² Ibid.

⁴³ Ibid.

Upper	106,227	39.5	97,418	39.7	8,217	37.0	592	42.6
Unknown	12,208	4.5	10,335	4.2	1,783	8.0	90	6.5
Total AA	269,124	100.0	245,504	100.0	22,230	100.0	1,390	100.0
Percentage of Total Businesses:			91.2		8.3		0.5	
				Far	ms by Tract	& Revenue	Size	
	Total Farms by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	60	4.5	54	4.2	6	10.3	0	0.0
Moderate	205	15.4	194	15.3	11	19.0	0	0.0
Middle	425	31.9	407	32.0	18	31.0	0	0.0
Upper	619	46.5	596	46.9	22	37.9	1	50.0
Unknown	22	1.7	20	1.6	1	1.7	1	50.0
Total AA	1,331	100.0	1,271	100.0	58	100.0	2	100.0
Percentage of Total Farms:			95.5		4.4		0.2	

Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Economic Conditions

Similar to the Southern California assessment area, during the review period, the Bay Area assessment area's economic recovery from the pandemic was supported by its primary sectors but generally lagged behind the nation's large regional economies as a whole, with employment gains occurring slower than the national trends. ⁴⁴ In San Francisco and San Mateo counties, the economic recovery from the pandemic was in its early stages at the beginning of the review period, and initial employment and wage gains were being supported by growth in the technology sector. ⁴⁵ San Francisco and the surrounding Bay Area is the world's most prominent technology hub. The technology sector was particularly resilient during the initial recession, with low levels of initial job losses and full recovery by the end of 2020. ⁴⁶⁴⁷ High wages in the area initially supported consumer industries, as leisure and hospitality sectors were showing signs of rebounding in early 2021. ⁴⁸ However, consumer industries make up an outsize share of total employment in the area, and while these industries were negatively impacted by the pandemic nationwide, losses were particularly extreme in San Francisco. ⁴⁹ Job losses in leisure and hospitality reached 60 percent in the local area, compared to 50 percent nationally. ⁵⁰ As waves of layoffs in the technology sector began to occur during the review period, less local support was available for

⁴⁴ Moody's Precis Report, San Francisco-Redwood City-South San Francisco, CA, July 2021.

⁴⁵ Moody's Precis Report, San Francisco-Redwood City-South San Francisco, CA, July 2021.

⁴⁶ Ibid.

⁴⁷ Moody's Precis Report, San Francisco-Redwood City-South San Francisco, CA, August 2023.

⁴⁸ Moody's Precis Report, San Francisco-Redwood City-South San Francisco, CA, July 2021.

⁴⁹ Moody's Precis Report, San Francisco-Redwood City-South San Francisco, CA, February 2022.

⁵⁰ Ibid.

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consumer industries. In addition, decreased tourism and business travel to the area exacerbated challenges.⁵¹ Population loss driven by the pandemic and weak immigration was also a concern in San Francisco and San Mateo counties during the review period.⁵² However, outmigration was most pervasive in earlier years of the review period, and the net loss of residents had stabilized by 2024 when the net flow of adults aged 18-34 returned to positive levels.⁵³

San Jose County experienced similar recovery trends during the review period, led in large part by the technology and manufacturing sectors. A global shortage of semiconductor computer chips occurred during the review period but did not impact the San Jose area as strongly as other large metro areas due to its array of local manufacturing firms that include semiconductor chipmakers.⁵⁴ The area maintains an outsize share of computer and electronics manufacturing jobs and benefited from increased federal investment in chip-production early in the review period.⁵⁵ However, geopolitical events that disrupted global supply chains adversely impacted the area, and manufacturing employment growth had essentially flatlined by 2022.⁵⁶ While the technology sector was vital early in the review period, major layoffs, high interest rates, and reduced investor funding presented challenges for the sector in later years. As the technology sector is particularly exposed to high interest rates and the corresponding pricing costs, increases in both resulted in local firms seeking cost-saving solutions, including waves of layoffs and the relocation of offices to more affordable areas.⁵⁷ San Jose is particularly exposed to risks in the commercial real estate market, as area employees were among the slowest in the county to return to the office and vacancy rates increased consistently over the course of the review period.⁵⁸ This exposure was exacerbated by years of outmigration which generally abated by 2023.⁵⁹ By the end of the review period, the area was experiencing small but improving immigration trends, although domestic migrations were still negative.⁶⁰

The technology sector was also a key driver of the local economy of Alameda County. Recovery of the technology sector in the area occurred faster than other large metro areas in the country, as Alameda County's close proximity to San Francisco provided access to venture capital and a skilled workforce while being a more affordable option for businesses. Consumer services and commercial real estate struggled throughout the review period with the rise of remote work, indicating that while the technology sector was rebounding, many workers may have been physically located elsewhere. Transportation and warehousing were stabilizers of the economy during the review period, as the area is home to one of the largest ports in the country and crucial to global supply chains. Later in the review period, the technology sector weakened following waves of layoffs and high interest rates that

⁵¹ Ibid

⁵² Moody's Precis Report, San Francisco-Redwood City-South San Francisco, CA, August, 2022.

Moody's Precis Report, San Francisco-Redwood City-South San Francisco, CA, May 2024.

⁵⁴ Moody's Precis Report, San Jose-Sunnyvale-Santa Clara, CA, July 2021.

⁵⁵ Ibid

⁵⁶ Moody's Precis Report, Oakland-Hayward-Berkeley, CA, March 2022.

⁵⁷ Moody's Precis Report, Oakland-Hayward-Berkeley, CA, November 2023.

⁵⁸ Moody's Precis Report, Oakland-Hayward-Berkeley, CA, November 2023.

⁵⁹ Moody's Precis Report, Oakland-Hayward-Berkeley, CA, March 2024.

⁶⁰ Ibid.

⁶¹ Moody's Precis Report, Oakland-Hayward-Berkeley, CA, May 2021.

⁶² Moody's Precis Report, Oakland-Hayward-Berkeley, CA, November 2021.

Moody's Precis Report, Oakland-Hayward-Berkeley, CA, May 2022.

decreased investment.⁶⁴ Due to the area's reliance on the technology sector, this resulted in negative impacts to consumer services.⁶⁵

Housing affordability remains a persistent issue across the Bay Area assessment area. While home prices began to decrease in 2023, the combination of high mortgage rates and elevated prices continued to push homeownership out of reach for many area residents.

Home price appreciation in the assessment area was notably less than the state and national levels; however, any increases in housing prices within the assessment area weigh on potential buyers. ⁶⁶ Across the assessment area, high costs of living drove outmigration of low- and mid-wage earners; however, population trends were anticipated to stabilize in the coming years, largely driven by rising immigration and slowing domestic departures. ⁶⁷

Historical median family income data indicate that income levels were on the rise in the years leading up to the review period. Between 2015 and 2020, increases in median family incomes within the assessment area surged ahead of the state as a whole. The average median family increase across the assessment area was approximately 26.5 percent with the largest gains made in San Francisco County. Growth across the area was well above that the statewide figure. Exhibit 11 below reflects the change in median family income that occurred in the assessment area and the State of California.

EXHIBIT 11 MEDIAN FAMILY INCOME CHANGE ASSESSMENT AREA: BAY AREA								
Area 2015 Median Family Income 2020 Median Family Income Percent Change								
Alameda County, CA	\$100,875	\$125,834	24.7%					
San Francisco County, CA	\$105,254	\$138,207	31.3%					
San Mateo County, CA	\$119,880	\$148,138	23.6%					
Santa Clara County, CA	\$118,694	\$148,065	24.7%					
State of California	\$77,267	\$89,798	16.2%					

Source: 2011 - 2015 U.S. Census Bureau American Community Survey

2016 - 2020 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

Similar to the rest of the state, the unemployment rate of the area increased sharply in 2020 following the COVID-19 pandemic; however, the recovery in the area kept pace with the recovery of California as a whole. Exhibit 12 on the following page reflects the unemployment rates of the assessment area and the state between 2018 and 2022.

⁶⁴ Moody's Precis Report, Oakland-Hayward-Berkeley, CA, May 2024.

⁶⁵ Ibid

⁶⁶ Moody's Precis Report, San Francisco-Redwood City-South San Francisco, CA, July 2021.

⁶⁷ Moody's Precis Report, San Jose-Sunnyvale-Santa Clara, CA, March 2024.

EXHIBIT 12 UNEMPLOYMENT RATES ASSESSMENT AREA: BAY AREA									
Area 2018 2019 2020 2021 2022									
Alameda County, CA	3.1%	3.0%	8.9%	6.1%	3.3%				
San Francisco County, CA	2.4%	2.2%	7.9%	5.1%	2.5%				
San Mateo County, CA	2.2%	2.1%	6.9%	4.6%	2.4%				
Santa Clara County, CA	2.6%	2.5%	7.1%	4.8%	2.6%				
State of California	4.2%	4.1%	10.1%	7.3%	4.2%				

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

The cost burden for renters and owners indicates a need for affordable housing in the area, as many low- and moderate-income renters and owners are spending 30 percent or more of their household income on housing. Rent affordability and housing costs for low-income populations in particular was low throughout the overall area, with specific challenges in San Mateo County. Exhibit 13 below reflects the percentages of cost burdened renters and owners within the assessment area and statewide.

EXHIBIT 13 HOUSING COST BURDEN ASSESSMENT AREA: BAY AREA									
	Cost	: Burden - Ren	ters	Cos	t Burden - Ow	ners			
		Moderate	Moderate	All					
Area	Low Income	Income	All Renters	Income	Income	Owners			
Alameda County, CA	79.1%	51.7%	44.3%	64.5%	47.1%	26.4%			
San Francisco County, CA	66.5%	38.1%	33.6%	56.9%	37.6%	27.7%			
San Mateo County, CA	83.1%	50.5%	44.9%	64.0%	42.2%	28.1%			
Santa Clara County, CA	79.8%	54.2%	41.8%	62.0%	41.6%	26.5%			
State of California	80.6%	52.0%	49.5%	65.8%	46.4%	29.3%			

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

Growth in small business loan volumes within the assessment area experienced disruptions during the review period but generally outperformed statewide trends. As a whole, small business lending steadily increased through 2019 before easing in 2020, particularly in San Francisco County. Assessment area loan volume growth resumed in 2021 with an average 7.4 percent increase from the year prior, which was less than the statewide loan growth of 13.5 percent during the same period, as depicted on Exhibit 14 on the following page. Lending to small businesses is critical for the support of the local economy given that small businesses represented at least 91 percent of all businesses in the assessment area, as reflected in Exhibit 10 above.

EXHIBIT 14 SMALL BUSINESS LOAN TRENDS ASSESSMENT AREA: BAY AREA									
Area 2017 2018 2019 2020 2021									
Alameda County, CA	40,773	47,028	49,468	49,871	55,515				
San Francisco County, CA	36,039	42,112	42,538	40,124	41,308				
San Mateo County, CA	San Mateo County, CA 22,806 25,550 26,941 26,586 28,417								
Santa Clara County, CA 49,991 56,629 59,307 57,402 62,258									
State of California	961,046	1,072,551	1,146,375	1,182,917	1,342,194				

Source: Federal Financial Institutions Examination Council (FFIEC) Community Reinvestment Act Aggregate Data

Mortgage loan growth within the assessment area increased sharply in 2020, with an average increase of 91.3 percent of loan originations from the prior year, which topped statewide increases of 83.8 percent during that same timeframe. Increases generally leveled in 2021 before decreasing dramatically in 2022. Exhibit 15 below reflects mortgage loans originated by financial institutions in the assessment area and the State of California during the period of 2018 through 2022.

EXHIBIT 15 HOME MORTGAGE TRENDS ASSESSMENT AREA: BAY AREA									
Area 2018 2019 2020 2021 2022									
Alameda County, CA	31,581	46,805	91,798	89,783	25,220				
San Francisco County, CA	11,241	14,906	26,258	29,024	10,564				
San Mateo County, CA	12,811	18,860	36,071	38,364	10,863				
Santa Clara County, CA	33,176	48,930	95,972	101,216	26,290				
State of California	711,925	1,022,475	1,879,527	1,874,900	652,918				

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act Loan/Application Records

Credit and Community Development Needs

Similar to the discussion for the credit needs of the Southern California assessment area, community contacts in the assessment area indicated that affordable housing, services for low-and moderate-income individuals and families, and support for small business are critical needs of the Bay Area assessment area.

One community contact indicated that small business borrowers in the area are experiencing high rejection rates, usually due to low credit scores or lack of sufficient business plans. The contact indicated that ample opportunities exist for financial institutions to engage in micro-loan programs, as smaller-dollar loans for start-up businesses for amounts of \$50,000 or less are a critical need in the area.

Another community contact indicated that, while the overall economy has been making progress in its recovery, rent prices continue to increase and housing shortages persist. The contact indicated that critical needs include tax-exempt bonds to create more opportunities for affordable housing organizations to develop new properties, as scarcity is driving high competition among affordable housing developers in accessing these bonds. The contact also indicated that construction labor

shortages are causing pricing issues, and that the supply of affordable housing should be distributed throughout communities, and not only in low- and moderate-income neighborhoods.

Conclusions with Respect to Performance Tests in the Bay Area

Lending Test

EWB's performance under the lending test in the Bay Area is outstanding. This conclusion is based on excellent levels of lending that were responsive to area credit needs, overall excellent geographic distributions of loans, and excellent distribution of loans to businesses of different revenue sizes. EWB is a leader in making community development loans that were particularly responsive to the community needs of the Bay Area markets in which it operates. Table 1 and Tables 14 through 25 include loan and demographic data used to assess the bank's performance under the lending test.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs. Overall, EWB extended an excellent number of loans in the Bay Area for all loan types, with the number of small business loans particularly notable. In addition, the percentage of loans originated in the assessment area is comparable to the percentage of deposits taken in the area. During the review period, the bank extended 2,923 HMDA loans and 13,539 small business loans in the Bay Area. Loan volume data is depicted in Table 1.

Lending Distribution by Geography

Overall lending distribution by geography within the Bay Area assessment area is excellent. As seen in Tables 10 through 17, the bank extended loans within census tracts of all income categories. Lending levels in both low- and moderate-income census tracts were excellent and consistent with the lending opportunities in those areas. Lending patterns were reasonable, displayed no unusual or conspicuous lending gaps, and largely followed the locations of EWB's branches and business or housing unit concentrations.

Small Business Lending

The geographic distribution of small business loans is excellent. As seen on Tables 14 and 15, EWB's performance is strong in both low- and moderate-income census tracts for the entirety of the review period. Particularly strong performance was noted in low-income geographies, where lending to small businesses significantly exceeded both aggregate lending and the percentage of businesses in those areas. Small business lending in low- or moderate-income areas significantly exceeding the percentage of businesses in those areas, as well as the aggregate lending performance.

Home Mortgage Lending

The geographic distribution of home purchase loans is excellent, particularly given the high cost of housing in the area. Lending was distributed within census tracts of all income categories and there were no conspicuous lending gaps. As seen on Tables 16 and 18, strong performance was noted throughout the period in both low- and moderate-income census tracts, as levels of lending

exceeded the percentage of owner-occupied units in those aeras, as well as the lending levels of aggregate lenders.

The geographic distribution of home mortgage refinance loans is excellent. As seen on Tables 16 and 18, lending distributions were strong within low-and moderate-income census tracts, with notable performance in moderate-income geographies. Home refinance loan distributions were excellent in 2020, 2021, and 2023, while distributions were good in 2022. Overall, lending levels generally exceeded the percentage of owner-occupied units and aggregate lending in low- and moderate-income areas.

Distributions of home improvement loans were also excellent, with excellent performance demonstrated for the entirety of the review period. Multi-family lending distributions by geography are generally good, with good performance demonstrated in 2020 and 2022, and adequate performance noted in 2021. Similar to home improvement loans, the bank extended fewer multi-family loans than home purchase or refinance loans. Lending data of multi-family loans originated in 2023 was considered but not sufficient for a meaningful analysis. Mortgage lending distributions and comparative data used in this assessment are presented on Tables 16 and 18 in Appendix E.

Lending Distribution by Business Revenue

Overall lending distribution by business revenue within the Bay Area assessment area is excellent. Lending to small businesses was generally comparable to the representation of businesses and was well above aggregate lending levels. Data from Tables 20 and 21 were used in this assessment.

Small Business Lending

The distribution of loans to businesses of different sizes is excellent. The percentage of lending to small businesses compared favorably with the representation of small businesses and substantially exceeded aggregate lending. EWB's lending data exhibited a surge in lending to small businesses with revenues of \$1 million or less during 2022 and 2023. The improvement is attributable to the bank's partnership with a non-profit organization that provides micro-loans to very small businesses. This partnership helped to increase lending to small businesses and increased the number of small business loans in smaller dollar amounts, which are identified assessment area credit needs. Data relied upon for this assessment can be found on Tables 20 and 21 in Appendix E.

Community Development Lending

The bank is a leader in making community development loans that exhibit excellent responsiveness to the community and credit needs within the Bay Area assessment area. Lending levels were commensurate with the bank's capacity and opportunities within the assessment area. As seen on Table 1, the bank extended 215 community development loans totaling \$724.7 million during the review period. Loans were responsive to a variety of community development needs with a majority addressing the need for affordable housing. During the review period, EWB extended 104 loans totaling \$265.9 million to develop or preserve over 2,600 units of affordable housing, mainly in multifamily dwellings located in low- and moderate-income areas. Loans also helped revitalize and stabilize low- and moderate-income areas, provided financial support to non-profit community service organizations, and contributed to economic development by financing small businesses. Notable examples include:

- A \$36.2 million loan that financed the purchase of a 219-room, upscale hotel located in a moderate-income geography within the assessment area. Hotel operations naturally attract tourism which increases foot traffic around the neighborhood, benefiting nearby businesses.
- A \$6.3 million loan that helped to revitalize and stabilize a moderate-income census tract through the refinance of a 126-room limited-service hotel in the assessment area.
- A \$5.8 million loan participation that financed the acquisition and rehabilitation of a 50-unit affordable housing complex for low- and moderate-income individuals and families in the assessment area.
- A \$5.5 million loan participation that financed the acquisition of a 143-unit affordable housing complex for low-income individuals and families. Except for one manager unit, all units are restricted to residents earning 50 percent of the area median income, and 29 units that are set aside for homeless tenants earning 30 percent area median income or below.
- A \$2 million loan that provided working capital for a small business located in the assessment area, securing employment for 70 low- or moderate-income individuals.

Investment Test

EWB's performance under the investment test is outstanding. The bank is a leader in making community development investments in the Bay Area assessment area. Excellent levels of qualified investments and grants were made that benefited all portions of the assessment area and that exhibited excellent responsiveness to community credit needs, particularly the need of affordable housing for low- and moderate-income families and individuals. Community development donations were also provided to a number of organizations serving the needs of low- and moderate-income individuals within the assessment area. As seen on Table 50, the bank made 146 qualified investments and donations totaling \$196.5 million comprised of \$64.1 million in new investments and \$132.4 million in investments that remained on the bank's books from a prior period. Notable examples of qualified investments that directly benefited the assessment area include the following:

- A \$20.9 million investment that funded a LIHTC project within the assessment area that provided 49 affordable housing units for low- and moderate-income individuals and families.
- A \$7.3 million investment into a LIHTC project that provided 249 affordable housing units for low- and moderate-income households inside the assessment area.
- A \$4.7 million investment made in prior periods that supports economic development by funding an SBIC that invests in small businesses operating in the assessment area, serving to create or retain jobs.
- A \$7.3 million investment into a New Market Tax Credit fund that provided support for several economic development projects within the Bay Area assessment area.

Service Test

Performance under the service test in the Bay Area is low satisfactory. During the review period, the bank's branching activity resulted in an adverse impact on the accessibility of its delivery systems, particularly in low-income geographies. Branch closures notwithstanding, delivery systems remain reasonably accessible, and bank employees provided a relatively high level of community development services during the review period.

Retail Banking Services

Retail banking services are reasonably accessible to the bank's geographies and do not vary in a way that inconveniences any portion of its assessment areas. A full array of personal and business banking products and services is offered at all locations in the Bay Area. A substantial majority of branches offer Saturday hours, including the branch located in a grocery store, which also offers extended evening hours. In addition, delivery systems including 21 ATMs, telephone banking, mobile and online banking, and remote deposit capture provide customers access to banking services after normal business hours.

The majority of branches are located in San Francisco and Alameda Counties with a total of 15 branches (10 in San Francisco and 5 in Alameda), followed by four branches in Santa Clara County, and three in San Mateo County. During the review period, branch optimization activities resulted in the closure of three branches. Two were located in low-income census tracts, and one in a middle-income census tract. Due to the volume of closures occurring in low-income census tracts, the branching activity in the assessment area adversely affected the accessibility of delivery systems to low-income geographies and individuals. However, the remaining branch network provided reasonably accessible services throughout the assessment area. As seen on Table 51, 31.8 percent of branches are located within low-and moderate-income geographies, which is comparable to the 27.1 percent of the population that resides in those areas.

Community Development Services

EWB provided a relatively high level of services in the Bay Area assessment area. Employees provided over 80 services totaling more than 2,300 service hours during the review period. For five of the organizations served, employees held leadership positions as board or committee members. Qualified services met a variety of community development needs, including the provision of financial education for low- and moderate-income students and families and SBA lending product presentations to small businesses. Significant time was also devoted to providing free income-tax preparation assistance to low- and moderate-income individuals and families. The following are notable examples of community development services:

- In partnership with local government and a non-profit organization, six EWB employees
 provided 150 hours of free tax services that helped 52 low- and moderate-income individuals
 obtain tax refunds. Services included a workshop that provided financial information, tax
 consultation, income tax filing assistance and Earned Income Tax Credit (EITC) to low-income
 families.
- Four bank employees provided 47 hours of financial literacy education to students of a
 San Francisco elementary school in which 88 percent of students qualified for free or reduced
 lunch. The curriculum was taught in partnership with a nonprofit organization and included a
 simulation game and information about taxes, decision making, and how money flows through
 an economy.
- Three bank employees provided 24 service hours by reviewing applications of small businesses
 for submission into an 8-week program offered by a local nonprofit that helps launch and
 maximize new and existing Bay Area small businesses, delivering a range of services from
 training and consulting to business incubation, access to capital, networking and special
 programs for women.

Limited-Scope Assessment Area Conclusions

*For each assessment area where a limited-scope review was performed using the examination procedures.

EWB's performance in the assessment areas receiving a limited review is consistent with the performance in the areas receiving full-scope reviews. Due to the bank's smaller presence in these markets and lower percentages of loans and deposits, the limited scope assessment areas received less weight than the full-scope areas. Consequently, performance in these areas did not materially affect the bank's overall lending, investment, and service test performance assessments. EWB operations are limited to one branch in Sacramento County and one branch in San Diego County. Facts and data reviewed, including performance and demographic information, can be found in the tables accompanying this report.

Ехнівіт 16							
LIMITED-SCOPE ASSESSMENT AREA CONCLUSIONS							
ASSESSMENT AREA	ASSESSMENT AREA LENDING TEST INVESTMENT TEST SERVICE TEST						
Sacramento	Consistent	Consistent	Consistent				
San Diego	San Diego Consistent Consistent Consistent						

STATE OF NEW YORK

CRA Rating for New York

Performance in New York is rated "OUTSTANDING"

The lending test is rated:

Outstanding

The investment test is rated:

Outstanding

The service test is rated:

High Satisfactory

The major factors supporting the institution's rating include:

- Lending levels that reflect excellent responsiveness to assessment area credit needs with high levels of loans made to small businesses.
- Excellent geographic and borrower distributions of loans throughout the assessment area and to businesses of different sizes.
- Demonstrated leadership in community development lending that was particularly responsive to the needs of the assessment area.
- Leadership in making qualified investments that addressed the critical needs of the assessment areas, including affordable housing for low- and moderate-income individuals.
- Readily accessible delivery systems for retail banking services and relatively high levels of community development services.

Scope of Examination

The scope of the examination for New York is generally consistent with the overall scope of the CRA examination. The bank has one assessment area in the state of New York. Although the bank's overall presence and certain types of loan activity in this area are limited, a full scope review was conducted to determine the overall state rating. The lending test assessment included the origination and purchases of small business, home purchase, home refinance, home improvement, and multi-family loans. Distribution of credit by geographic profile was evaluated through both small business and HMDA lending; however, due to limited availability of borrower income information, for reasons previously discussed, distribution of credit by borrower profile was evaluated through small business lending only.

Description of Operations in New York

The New York assessment area includes Bronx, Kings, New York, Queens, and Richmond counties. These counties represent the five New York City boroughs and are part of the New York-Jersey City-White Plains MD, which is part of the multi-state New York-Newark-Jersey City MSA. As of July 1, 2023, the assessment area was home to an estimated 8.3 million people.⁶⁸

⁶⁸ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2023; available from: www.census.gov/quickfacts/.

EWB operated six branches in the assessment area that together held \$1.3 billion in deposits, representing 0.07 percent of the deposit market share as of June 30, 2024.⁶⁹ By comparison, there were a total of 107 FDIC-insured financial institutions operating 1,437 offices within the assessment area, with deposits totaling over \$1.8 trillion.⁷⁰

Exhibit 17 below presents key demographic and business information used to help develop a performance context for the assessment area.

EXHIBIT 17 ASSESSMENT AREA DEMOGRAPHICS ASSESSMENT AREA: NEW YORK								
Income Categories	Tract Dis	tribution	Families Inco	by Tract	Families < Level a Families	s % of	Families by Family Income	
	#	%	#	%	#	%	#	%
Low	285	12.2	296,296	15.6	99,337	33.5	567,709	29.8
Moderate	570	24.5	501,535	26.4	87,388	17.4	303,882	16.0
Middle	727	31.2	581,501	30.6	52,967	9.1	308,919	16.2
Upper	596	25.6	505,176	26.6	22,023	4.4	722,120	38.0
Unknown	149	6.4	18,122	1.0	3,996	22.1	0	0.0
Total AA	2,327	100.0	1,902,630	100.0	265,711	14.0	1,902,630	100.0
	Hausina			Hous	ing Type by T	ract		
	Housing Units by	Owner-occupied			Rental		Vacant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	510,345	37,280	3.6	7.3	444,149	87.0	28,916	5.7
Moderate	860,454	179,614	17.1	20.9	614,917	71.5	65,923	7.7
Middle	974,373	381,315	36.4	39.1	515,366	52.9	77,692	8.0
Upper	1,130,285	442,320	42.2	39.1	537,506	47.6	150,459	13.3
Unknown	44,138	7,733	0.7	17.5	31,491	71.3	4,914	11.1
Total AA	3,519,595	1,048,262	100.0	29.8	2,143,429	60.9	327,904	9.3
	Takal Bass			Busin	esses by Trac	t & Revenu	e Size	
		inesses by act	Less Tha \$1 Mi		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	30,320	8.2	28,386	8.5	1,758	5.6	176	6.2
Moderate	65,596	17.8	61,763	18.5	3,434	10.9	399	14.1
Middle	80,881	22.0	76,516	22.9	3,814	12.1	551	19.5

Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2024; available from: https://banks.data.fdic.gov/bankfind-suite/SOD.

Ibid.

Upper	169,922	46.1	150,229	45.0	18,210	57.6	1,483	52.4
Unknown	21,725	5.9	17,122	5.1	4,381	13.9	222	7.8
Total AA	368,444	100.0	334,016	100.0	31,597	100.0	2,831	100.0
Percentage of Total Businesses:			90.7		8.6		0.8	
			Far	ms by Tract 8	& Revenue S	Size		
	Total Farms by Tract			Less Than or = \$1 Million Over \$		Million	Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	75	9.2	71	8.9	4	21.1	0	0.0
Moderate	142	17.4	140	17.6	2	10.5	0	0.0
Middle	168	20.6	165	20.8	2	10.5	1	100.0
Upper	380	46.6	373	46.9	7	36.8	0	0.0
Unknown	50	6.1	46	5.8	4	21.1	0	0.0
Total AA	815	100.0	795	100.0	19	100.0	1	100.0
Percentage of Total Farms:			97.5		2.3		0.1	

Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Economic Conditions

The New York assessment area was in state of economic recovery for the duration of the review period, working to rebound from the economic challenges brought on by the pandemic. Early in the review period, the area was still adjusting to rising consumer demand as COVID-19 vaccination rates increased and offices and businesses began to resume operations. Consumer industries led employment growth initially, largely due to increased tourism and weekend visitors, as population losses in the Manhattan area reached 40-year highs, reducing local support for businesses in the area. Nevertheless, consumer industries faced headwinds throughout the review period, as companies struggled with the long-term remote work postures and overall tourism was slow to rebound. Domestic passenger volumes at New York airports did not return to 2019 levels until early 2023. Job cuts in the technology and finance sectors, combined with shifting trends towards remote work, were also major challenges for the area economy.

Inflation in the New York metropolitan area was milder than elsewhere in the country, which led to stronger consumer sentiment and prevented the economy from overheating; however, the New York area still faced national price pressures that raised its consumer price index during the review period.⁷⁵ While overall inflation did occur, the area's increase was among the lowest of the country's tracked

Moody's Precis Report, New York-Jersey City-White Plains NY-NJ, NY, May 2021.

Moody's Precis Report, New York-Jersey City-White Plains NY-NJ, NY, November 2022.

Moody's Precis Report, New York-Jersey City-White Plains NY-NJ, NY, May 2021.

Moody's Precis Report, New York-Jersey City-White Plains NY-NJ, May 2023.

Moody's Precis Report, New York-Jersey City-White Plains NY-NJ, May 2022.

markets, partly due to minimal growth in housing costs.⁷⁶ Wage growth was also slower than many other areas.⁷⁷

Ongoing outmigration throughout the area also impacted the local economy, as the exodus of residents following the COVID-19 pandemic was slow to abate, largely owing to layoffs during the review period and the rise of remote work.⁷⁸ The trend toward remote work also had major effects on commercial real estate in the New York metropolitan area. With less demand for office usage, many companies elected not to renew their leases, causing vacancy rates to rise at nearly twice the national pace.⁷⁹ By early-2023, usage of the area's massive office market was still at half of pre-pandemic levels.⁸⁰

Census data shows that between 2015 and 2020, increases in median family incomes within the assessment area were generally outpacing growth of the state as a whole. The average median family increase across all counties of the assessment area was approximately 17 percent, which was well above the statewide figure of 11 percent. Within the assessment area, the largest income growth occurred in Kings County. Exhibit 18 below reflects the change in median family income that occurred in the assessment area and the State of New York during that timeframe.

Ехнівіт 18								
MEDIAN FAMILY INCOME CHANGE								
	ASSESSMENT AREA: NEW	York						
	2015 Median Family	2020 Median Family						
Area	Income	Income	Percent Change					
Bronx County, NY	\$42,083	\$49,624	17.9%					
Kings County, NY	\$58,789	\$71,985	22.4%					
New York County, NY	\$97,557	\$114,659	17.5%					
Queens County, NY	\$70,444	\$81,193	15.3%					
Richmond County, NY	\$93,730	\$102,502	9.4%					
State of New York	\$78,570	\$87,270	11.1%					

Source: 2011 - 2015 U.S. Census Bureau American Community Survey

2016 - 2020 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

The unemployment rate of the assessment area was generally in line with the statewide unemployment rate leading up to the pandemic and increased sharply in 2020 due to the subsequent economic fallout. Average unemployment within the area was 12.2 percent in 2020, with the largest rise occurring in Bronx County. The area recovery generally kept pace with the recovery of the state as a whole but unemployment rates remained above the state average. Exhibit 19 on the following page reflects the unemployment rates of the assessment area and the state between 2018 and 2022.

⁷⁶ Ibid.

⁷⁷ Ibid.

⁷⁸ Ihid

Moody's Precis Report, New York-Jersey City-White Plains NY-NJ, NY, November 2023.

Moody's Precis Report, New York-Jersey City-White Plains NY-NJ, May 2023.

EXHIBIT 19 UNEMPLOYMENT RATES									
Assessment A	AREA: NEW YOR	RK							
Area 2018 2019 2020 2021 2022									
Bronx County, NY	5.7%	5.4%	16.0%	13.8%	7.8%				
Kings County, NY	4.2%	4.1%	12.4%	10.3%	5.9%				
New York County, NY	3.7%	3.5%	9.5%	7.7%	4.6%				
Queens County, NY	3.6%	3.5%	12.4%	9.8%	5.2%				
Richmond County, NY	4.1%	3.8%	10.5%	8.9%	5.5%				
State of New York	4.1%	3.9%	9.8%	7.0%	4.3%				

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

The cost burden for renters and owners indicates a need for affordable housing in the assessment area, as many low- and moderate-income renters and owners are spending 30 percent or more of their household income on housing. Affordable housing options for low-income populations in particular were scarce, and notably the cost burden for both low- and moderate-income renters in many counties of the assessment area is higher than the state as a whole. Exhibit 20 below reflects the percentages of cost burdened renters and owners within the assessment area and the state of New York.

Ехнівіт 20 HOUSING COST BURDEN ASSESSMENT AREA: NEW YORK								
	Cost Burden - Renters Cost Burden - Owners							
	Low	Moderate		Low	Moderate	All		
Area	Income	Income	All Renters	Income	Income	Owners		
Bronx County, NY	76.5%	33.1%	54.8%	64.5%	44.6%	33.8%		
Kings County, NY	76.7%	45.2%	48.1%	76.0%	51.0%	35.4%		
New York County, NY	71.5%	50.7%	41.0%	59.5%	44.9%	20.4%		
Queens County, NY	81.0%	53.0%	48.1%	73.5%	47.2%	35.0%		
Richmond County, NY	chmond County, NY 73.6% 43.7% 47.0% 79.2% 50.4% 32.79							
State of New York	76.1%	41.4%	46.6%	70.0%	40.4%	25.6%		

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

As depicted in Exhibit 21 on the following page, growth in the number of small business loans originated in the area between 2017 and 2021 was generally steady and kept pace with overall increases in the state as a whole. Small business loan growth slowed in 2020 but increased sharply in 2021 to realign with statewide growth volumes. Total growth between 2017 and 2021 was 52 percent on average within the assessment area, and growth statewide during that same timeframe was 41.8 percent. Continued lending to small businesses is critical for the support of the local economy, given that businesses with gross annual revenues of \$1 million or less represented over 92 percent of all businesses in the assessment area, as reflected in Exhibit 17 above.

Ехнівіт 21								
SMALL BUSINESS LOAN TRENDS								
ASSESSMENT A	REA: NEW Y	ORK						
Area	2017	2018	2019	2020	2021			
Bronx County, NY	11,810	12,528	14,855	16,389	22,953			
Kings County, NY	72,588	77,292	87,244	82,438	99,441			
New York County, NY	84,331	90,703	97,446	104,912	107,063			
Queens County, NY	48,547	52,967	58,717	57,364	77,180			
Richmond County, NY	9,754	10,527	11,567	11,883	13,926			
State of New York	465,168	500,291	547,956	584,496	659,707			

Source: Federal Financial Institutions Examination Council (FFIEC) Community Reinvestment Act Aggregate Data

Mortgage loan originations within the assessment area were steady between 2018 and 2021 but experienced a sharp decline in 2022. The largest growth by number of loans in the assessment area occurred in 2021, with a 33.6 percent average increase from the previous year; however, mortgage originations decreased by over 44.8 percent on average in 2022. Mortgage loan originations in the State of New York experienced similar growth through 2021 and decline in 2022. Exhibit 22 below reflects mortgage loans originated by financial institutions in the assessment area and statewide during the period of 2018 through 2022.

Ехнівіт 22									
HOME MORTGAGE TRENDS									
ASSESSMENT AREA	New York								
Area	Area 2018 2019 2020 2021 2022								
Bronx County, NY	4,314	5,077	6,319	8,265	4,531				
Kings County, NY	14,728	16,991	22,451	31,275	17,352				
New York County, NY	9,644	12,487	14,679	21,546	13,063				
Queens County, NY	17,262	18,620	23,848	32,276	18,206				
Richmond County, NY	7,029	7,549	11,597	13,504	6,567				
State of New York	227,570	254,573	359,608	426,042	242,455				

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act Loan/Application Records

Credit and Community Development Needs

The economic data described above and feedback from community contacts indicate that credit and community development needs are present in the assessment area. One community contact indicated that a major opportunity for local financial institutions to help address the credit needs of the area is in assisting small businesses' access to credit, technical support, and space, according to the contact. The contact indicated that New York City has experienced an entrepreneurial boom since the start of the pandemic, and there is a continued need for funding and technical support of these new businesses. Additionally, there has been an increase in commercial vacancies, which creates an opportunity for local financial institutions to become involved in repurposing this vacant space for small businesses through investment.

Additionally, the contact noted that rural communities across the state remain underbanked and could benefit from increased resources applied by local banks and the Federal Government. Current housing

projects under consideration are smaller in scale, consisting of 10- to 20-unit developments, according to the contact. Accordingly, certain economies of scale available to larger projects in urban areas are not realized. These economies would include infrastructure provided by municipal utilities whose cost per unit decreases with larger scale projects with more units.

Marginalized communities within the assessment area are underbanked, and there is also an extreme lack of financial literacy within these communities. Opportunities exist to help local communities through financial literacy assistance. Additionally, affordable housing is extremely limited, according to the contact. Financial institutions could help communities by financing programs related to affordable housing. Additionally, donations and grants to those same communities and organizations would be helpful to help address community needs.

Conclusions with Respect to Performance Tests in New York

Lending Test

Lending test performance in New York is outstanding. Lending levels are excellent, and lending patterns demonstrated excellent penetration of geographies of different income levels and small business borrowers of different revenue sizes. EWB is a leader in making community development loans which were particularly responsive to the needs of the communities within the assessment area. The bank's lending test performance in New York was enhanced by the partnership established with a non-profit organization that serves very small businesses. Lending and demographic data used to assess the bank's performance under the lending test can be found on Tables 52 through 64.

Lending Activity

EWB extended an excellent number of loans in the assessment area, particularly given the bank's limited presence in the market. Similar to California, lending levels and loan growth from the prior examination was primarily driven by small business lending. Loan volume increases were also affected by partnerships with non-profits serving very small businesses and mortgage programs designed for lowand moderate-income homebuyers. Loan volumes are displayed in Table 52.

Lending Distribution by Geography

Distribution by geography within the assessment area is excellent. This assessment is based on high levels of lending in low- and moderate-income census tracts for all loan types evaluated. Loans were extended in census tracts of all income categories with strong performance within low-and moderate-income geographies. Lending patterns generally followed the locations of EWB's branches and business or housing unit concentrations.

Small Business Lending

The geographic distribution of small business loans is excellent. As seen on Tables 53 and 54, loans were extended in census tracts of all income levels during the review period, and the percentage of lending in low-and moderate-income geographies significantly exceeded the percentage of the area businesses and aggregate lending. Similar to lending in California, these distributions were attributable to the bank's partnership with a non-profit organization that serves very small businesses.

Home Mortgage Lending

The geographic distributions of home purchase, home refinance, and home improvement loans are excellent. Performance was particularly strong in low- and moderate-income census tracts where lending levels were above both owner-occupied units and aggregate lending for a majority of the loan types, and performance was especially notable for home purchases and home refinance loans. There were too few home improvement loans extended in 2020 to draw meaningful conclusions; however, performance in 2021, 2022, and 2023 was generally excellent. Relevant loan data is contained in Tables 55 and 57.

Lending Distribution by Borrower Income and Business Revenue

Lending distribution by business revenue within New York is excellent. This conclusion is based on the distribution of small business loans, as data associated with the income levels is unavailable for a significant majority of borrowers, as noted above. Lending to small businesses exceeded aggregate lending levels and, in some instances, the representation of businesses in those areas. Data from Tables 59 and 60 were used in this assessment.

Small Business Lending

The distribution of lending to small businesses is excellent. Lending levels to borrowers of different revenue sizes, including to businesses with \$1 million or less in gross annual revenues, substantially exceeded the performance of aggregate lenders for the duration of the review period. Additionally, lending in low- and moderate-income geographies exceeded the percentages of businesses in those areas during 2022 and 2023. Lending to small businesses is enhanced due to EWB's partnership with a non-profit that serves very small businesses.

In addition to excellent lending distributions, the majority of small business loans extended or purchased were in amounts of \$100,000 or less, which helped to address the assessment area credit need of smaller dollar loans.

Community Development Lending

EWB is a leader in making community development loans in the assessment area, given the bank's limited presence and the high level of competition in the area. During the review period, as seen on Table 52, the bank extended 92 community development loans, totaling \$635.8 million. These loans were responsive to a variety of community credit needs with most of the loans supporting economic development by financing small businesses to help create and retain jobs. A significant portion of the loans also helped stabilize low- and moderate-income census tracts. Notable community development loans follow:

A \$8.3 million loan that helped to revitalize and stabilize a moderate-income geography within
the assessment area by financing the rehabilitation of a 43-room limited-service hotel. The
traditional hotel operation attracts tourism and increases foot traffic, which stimulates existing
new businesses to the area.

- A \$8 million loan facility to refinance the purchase of land located in a low-income geography to be developed into a mixed-use residential condominium complex that includes 91 total housing units with 28 reserved for low- and moderate-income individuals and families.
- A \$6.1 million loan to finance the development of an 18-unit apartment building in association
 with a governmental affordable housing program. The project is located in a moderate-income
 geography.
- A \$3.5 million loan to provide working capital for a family-run small business operating within the assessment area, helping to retain employment for the company's eight employees.
- A \$3 million loan to a small manufacturing business located in the assessment area. The loan helped to retain the company's 168 employees, a majority of which were low- or moderateincome.
- A \$2.2 million loan to refinance a mixed-use facility that contained 10 apartment units, all of which are either rent restricted in accordance with local governmental affordability requirements or allocated as Section 8 units.

Investment Test

Performance under the investment test in the New York assessment area is outstanding. EWB is a leader in making qualified investments and grants that were responsive to the critical need of affordable housing for low- and moderate-income families and individuals. As seen in Table 65, EWB made 74 qualified investment and grants totaling \$80.5 million dollars, comprised of \$35 million in new investments and \$45.5 million in investments made during a prior period that remain on the bank's books. Current investments were primarily in CRA-eligible MBS. Investments were also made that benefited a broader statewide area that includes the New York assessment area totaling \$37.9 million, comprised of \$17.6 million in new investments and \$20.3 million in prior period investments. Notable qualified investments include the following:

- \$11.4 million in investments into a CRA-eligible MBS where the underlying mortgages were made to low- or moderate-income borrowers or within low- or moderate-income geographies.
- A \$15.6 million municipal bond investment made in prior periods that refinanced the costs of developing 107 affordable housing residential rental units located in the assessment area; specifically, Manhattan, New York.
- A \$1 million investment into a fund that was converted into a small business investment company focused on providing capital to early-stage companies within the assessment area.

Service Test

The bank's performance under the service test in the assessment area is high satisfactory. This assessment is based on readily accessible delivery systems and the responsiveness demonstrated through relatively high levels of community development services provided during the review period.

Retail Banking Services

Retail banking services are readily accessible to the bank's geographies and to individuals of different income levels within the assessment area and do not vary in a way that inconveniences any portion of the area. EWB operates 6 full-service branches within the New York assessment area. A full array of personal and business banking products and services is offered at all locations. All of the branches offer

Saturday hours, and three of the six are open seven days a week. In addition, delivery systems including six ATMs, telephone banking, mobile and online banking, and remote deposit capture are offered to provide customers access to banking services after normal business hours.

As seen on Table 66, EWB currently has five of its six branches in either low- or moderate-income geographies; four in low-income census tracts, and one in a moderate-income census tract. This results in outstanding access to banking services for low- and moderate-income communities, given that approximately 40 percent of the assessment area population resides in low-and moderate-income geographies. There were no changes to the bank's branches within the assessment area during the review period.

Community Development Services

EWB provided a relatively high level of community development services that were responsive to the need for affordable housing, economic development, and financial education for low- and moderate-income individuals. During the review period, employees provided 91 services totaling over 1,112 hours of community development service. Community development services include providing leadership and financial expertise to organizations benefiting local small businesses and participating in programs aimed at educating underserved immigrant populations. In addition, for four local organizations focused on community development initiatives, employees provided over 200 service hours in leadership capacities as board members. Notable services are as follows:

- 27 bank employees provided 124 hours of community development services to small businesses over the course of eight SBA-focused webinar events. The webinars provided overviews of SBA programs and services that target small businesses. The webinar series had a total of 178 attendees.
- 13 bank employees provided 93 hours of technical expertise for students of local Title I schools by assisting students with the preparation of their video submissions for a competition facilitated by a nonprofit organization that aims to prepare students through authentic business experiences. Bank employees also acted as judges within the competition.
- 10 bank employees provided 35 hours of community development services though hosting a
 webinar in which the employees provided information and support associated with SBA
 programs and services available to small business owners. The webinar was attended by
 28 participants. Bank employees also provided subsequent follow-up appointments for several
 attendees to focus on their specific business types.
- Eight bank employees provided 28 hours of community development services by hosting a webinar for small businesses. Bank employees provided overviews of SBA programs and services available to small business owners. The presentation provided guidance on what type of programs/loans are suitable for different business owners and was attended by 11 participants.

STATE OF TEXAS

CRA Rating for Texas

Performance in Texas is rated "OUTSTANDING"

The lending test is rated:

Outstanding

The investment test is rated:

Outstanding

The service test is rated:

High Satisfactory

The major factors supporting the institution's rating include:

- Overall excellent geographic and borrower distributions of loans primarily driven by small business loans, with a substantial majority of loans extended within the assessment areas.
- Leadership in making community development loans that are responsive to the community and credit need within the assessment areas.
- Excellent levels of community development investments that were responsive to the critical need for affordable housing for low- and moderate-income individuals.
- Accessible retail banking services and relatively high levels of community development services.

Scope of Examination

The scope of the examination for the state of Texas is consistent with the overall scope of the CRA examination. As previously noted, EWB has two assessment areas in Texas – Dallas and Houston. The majority of the bank's operations takes place in the Houston assessment area, where the bank has a greater branch presence, larger share of deposits, and higher loan volumes. As such, the Houston assessment area received a full-scope review, and the Dallas assessment area received a limited-scope review. The overall rating for the state of Texas follows the rating of the Houston assessment area.

All loan types shown on Table 67 were considered as part of the lending test evaluation. However, in some instances lending levels were insufficient to draw meaningful conclusions. While these loans were considered and are presented in the tables in Appendix E, they did not influence the overall assessment. In addition, as stated previously, EWB employs alternative credit standards to meet the needs of its immigrant client base and does not routinely collect borrower income information. As such, the lending test evaluation was based only on the following:

- All loan types were used to evaluate the responsiveness to assessment area credit needs based on the volume of lending within each assessment area.
- Small business, home purchase and home mortgage refinance loans were evaluated for geographic distributions.
- Small business loans were evaluated for borrower revenue distributions.

Description of Operations in Houston

The Houston assessment area is comprised of Fort Bend and Harris counties and is part of the Houston-The Woodlands-Sugar Land, Texas, MSA. As of July 1, 2023, the area was home to an estimated 5.7 million people. ⁸¹ EWB operated 9 branches in the area which together held \$1.1 billion in total deposits as of June 30, 2024. ⁸² By comparison, there were a total of 90 FDIC-insured financial institutions operating 1,010 offices in the area, with deposits totaling \$280.7 billion. ⁸³ EWB ranked twenty-fourth in the market, with 0.38 percent of the deposit market share. ⁸⁴

Exhibit 23 below presents key demographic and business information used to help develop a performance context for the assessment area.

		Λεετες	Exhibit		VDITICE .					
			OUSTON ASSES							
Income Categories	Tract Dis	tribution	Families by Tract Income		Level a	Families < Poverty Level as % of Families by Tract		y Family me		
	#	%	#	%	#	%	#	%		
Low	203	16.3	160,272	12.2	52,082	32.5	331,148	25.1		
Moderate	337	27.0	327,980	24.9	53,242	16.2	225,408	17.1		
Middle	306	24.5	363,999	27.6	27,852	7.7	233,821	17.7		
Upper	363	29.1	450,170	34.1	15,656	3.5	528,104	40.1		
Unknown	39	3.1	16,060	1.2	4,158	25.9	0	0.0		
Total AA	1,248	100.0	1,318,481	100.0	152,990	11.6	1,318,481	100.0		
		. Housing Type by Tract								
	Housing Units by	Owner-occupied			Rer	ntal	Vac	ant		
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit		
Low	283,886	67,634	6.2	23.8	180,394	63.5	35,858	12.6		
Moderate	522,776	233,284	21.4	44.6	242,823	46.4	46,669	8.9		
Middle	540,806	321,299	29.5	59.4	182,014	33.7	37,493	6.9		
Upper	667,060	458,869	42.1	68.8	162,003	24.3	46,188	6.9		
Unknown	41,627	9,382	0.9	22.5	26,346	63.3	5,899	14.2		
Total AA	2,056,155	1,090,468	100.0	53.0	793,580	38.6	172,107	8.4		
				Busin	esses by Tra	ct & Revenu	ue Size			
	Total Busi Tra		Less Tha \$1 Mi		Over \$1	Million	Revenue Not Reported			
	#	%	#	%	#	%	#	%		
Low	28,497	10.0	25,739	9.8	2,589	12.9	169	5.4		
Moderate	60,701	21.3	55,377	21.1	4,900	24.4	424	13.6		

U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2023; available from: www.census.gov/quickfacts/.

Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2024; available from: https://banks.data.fdic.gov/bankfind-suite/SOD.

⁸³ Ibid.

⁸⁴ Ibid.

Middle	70,966	24.9	66,013	25.2	4,359	21.7	594	19.0
Upper	120,241	42.1	110,651	42.2	7,712	38.4	1,878	60.0
Unknown	4,927	1.7	4,361	1.7	502	2.5	64	2.0
Total AA	285,332	100.0	262,141	100.0	20,062	100.0	3,129	100.0
Percent	tage of Total	Businesses:		91.9		7.0		1.1
			Far	ms by Tract	& Revenue	Size		
	Total Farms by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	63	3.9	60	3.8	3	9.4	0	0.0
Moderate	240	14.8	227	14.3	12	37.5	1	33.3
Middle	393	24.3	384	24.2	7	21.9	2	66.7
Upper	905	55.9	896	56.5	9	28.1	0	0.0
Unknown	19	1.2	18	1.1	1	3.1	0	0.0
Total AA	1,620	100.0	1,585	100.0	32	100.0	3	100.0
Percentage of Total Farms:			97.8		2.0		0.2	

Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Economic Conditions

During the review period, the Houston area economy shifted from the recovery phase of the business cycle, driven by the rebound from the COVID-19 pandemic, into late expansion.⁸⁵ In the early years of the pandemic, the area's recovery of jobs lost trailed the national recovery rate.⁸⁶ However, employment gains in mining, manufacturing, and professional services rebounded quickly, leading area job growth levels to subsequently outpace the national average. The area is a major hub for the energy industry, and the acceleration of energy exploration was instrumental in driving job growth, particularly as the inventory of existing oil wells decreased, prompting new exploration.⁸⁷ Higher oil prices caused by geopolitical factors also increased drilling profitability, driving new oil rig development to reach prepandemic levels by early 2022.⁸⁸

The expansion of energy exploration in the area supported the local manufacturing sector, as much of the equipment needed for drilling is fabricated and manufactured locally. ⁸⁹ Higher oil prices and the expansion of energy exploration also helped to boost professional services, due to an increased demand for engineers, geologists, financial, and information technology specialists. ⁹⁰

⁸⁵ Moody's Precis Report, Houstin-The Woodlands-Sugar Land TX, May 2023.

⁸⁶ Moody's Precis Report, Houstin-The Woodlands-Sugar Land TX, May 2021.

⁸⁷ Ibid.

⁸⁸ Moody's Precis Report, Houstin-The Woodlands-Sugar Land TX, May 2022.

⁸⁹ Moody's Precis Report, Houstin-The Woodlands-Sugar Land TX, November 2021.

⁹⁰ Ibid.

The construction sector also experienced solid growth early in the review period, outpacing the nation but slowed due to elevated mortgage rates and reduced housing affordability. ⁹¹ Housing development quickly rebounded, as developers were motivated by demographic trends and job growth in the area. ⁹² Similar to other assessment areas, new development of commercial real estate declined as office vacancies rose during the review period, despite employment growth in professional services. The increase in remote work was the primary reason that leasing activity and new construction remained significantly below pre-pandemic levels. ⁹³ Simultaneously, warehouse usage grew strongly during the review period, with rising absorption and declining vacancies throughout the area. One driver of this growth was infrastructure improvements at the Port of Houston that increased its overall capacity. ⁹⁴

By the later years of the review period, the local economy was in the late expansion phase of the business cycle. 95 Most industries had experienced job growth that exceeded the national levels, and exports, while moderately subdued by high interest rates and the strengthening dollar, supported the local area, assisted by port funding from the Infrastructure Investment and Jobs Act passed in late 2021. 96

Between 2015 and 2020, the median family income of the assessment area increased with major gains occurring in Harris County; however, these growth trends trailed the statewide figure. Although the greatest growth occurred in Harris County, the average family income in this area was much lower than in Fort Bend County during that timeframe. Exhibit 24 below reflects the change in median family income that occurred in the assessment area and the State of Texas.

Ехнівіт 24								
Median Family Income Change								
	ASSESSMENT AREA: H	OUSTON						
Area 2015 Median Family Income 2020 Median Family Income Percent Change								
Fort Bend County, TX	\$108,399	\$109,870	1.4%					
Harris County, TX	\$67,969	\$73,274	7.8%					
State of Texas	\$68,523	\$76,073	11.0%					

Source: 2011 - 2015 U.S. Census Bureau American Community Survey

2016 - 2020 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

Data concerning renters and owners that pay more than 30 percent of their income on housing costs indicate that many households are cost burdened and further indicates a need for affordable housing in the assessment area. Affordable housing options for low- and moderate-income renters were generally scarcer in the assessment area than the state as a whole, and the need is particularly critical for low-income and renters and homeowners. Exhibit 25 on the following page reflects the percentages of cost burdened renters and owners within the assessment area as well as statewide.

⁹¹ Moody's Precis Report, Houstin-The Woodlands-Sugar Land TX, May 2023.

⁹² Moody's Precis Report, Houstin-The Woodlands-Sugar Land TX, November 2022.

⁹³ Moody's Precis Report, Houstin-The Woodlands-Sugar Land TX, May 2023.

⁹⁴ Ibid

⁹⁵ Moody's Precis Report, Houstin-The Woodlands-Sugar Land TX, May 2023.

⁹⁶ Moody's Precis Report, Houstin-The Woodlands-Sugar Land TX, May 2024.

EXHIBIT 25 HOUSING COST BURDEN ASSESSMENT AREA: HOUSTON							
Cost Burden - Renters Cost Burden - Owners							
	Low	Moderate	All	Low	Moderate	All	
Area	Income	Income	Renters	Income	Income	Owners	
Fort Bend County, TX	76.6%	65.7%	41.8%	70.8%	48.2%	19.8%	
Harris County, TX	82.0% 45.4% 45.7% 60.7% 35.9% 20.3%						
State of Texas	78.3%	44.6%	42.7%	57.3%	31.0%	19.0%	

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

As depicted in Exhibit 26 below, the number of small business loans originated within the assessment area increased steadily during the review period and kept pace with statewide trends. Small business loans in the overall area increased by 61 percent between 2017 and 2021, with the largest increase occurring in 2021. Within Texas as a whole, small business lending increased by 53 percent during the same timeframe. Lending to small businesses is critical for the support of the local economy given that small businesses represented nearly 92 percent of all businesses in the assessment area, as depicted in Exhibit 23 above.

Ехнівіт 26							
SMALL BUSINESS LOAN TRENDS							
ASSESSMENT AREA: HOUSTON							
Area	2017	2018	2019	2020	2021		
Fort Bend County, TX	17,652	21,194	24,362	25,063	31,403		
Harris County, TX	97,317	108,173	120,746	134,448	153,681		
State of Texas	505,454	554,930	623,895	689,544	773,259		

Source: Federal Financial Institutions Examination Council (FFIEC) Community Reinvestment Act Aggregate Data

Mortgage loan originations within the assessment area experienced fluctuations in line with statewide trends during the review period. Mortgage volume statewide increased sharply in 2020, experiencing 62.3 percent growth from the prior year, before moderating in 2021 and steeply declining in 2022. Assessment area and statewide trends followed suit. Exhibit 27 below reflects mortgage loans originated by financial institutions in the assessment area and the state of Texas during the period of 2018 through 2022.

EXHIBIT 27 HOME MORTGAGE TRENDS ASSESSMENT AREA: HOUSTON							
Area	2018	2019	2020	2021	2022		
Fort Bend County, TX	17,486	21,547	39,711	41,350	20,359		
Harris County, TX	66,345	75,980	123,284	129,669	73,490		
State of Texas	503,850	592,278	976,766	1,002,616	589,884		

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act Loan/Application Records

Credit and Community Development Needs

East West Bank

Pasadena, California

The economic data described above and feedback from community contacts indicate that credit and community development needs remain in the assessment area. One community contact indicated that commercial lending for small businesses is a predominant need. The need of smaller-dollar loans was also demonstrated by a \$30 million Small Business Relief Fund implemented by local government in 2021 which provided loans in amounts of \$5,000 to \$25,000 to microenterprises and small businesses located inside the assessment area.⁹⁷

Another contact in the area indicated that homeownership for many in the area has been pushed further out of reach in recent years due to high inflation and increased interest rates. The contact also referenced a property insurance crisis due to high and increasing insurance costs for homebuyers. This insurance cost crisis also presents challenges for community organizations that manage affordable housing units for low- and moderate-income households, as these organizations are reluctant to pass the costs along to their tenants. Instead, the result is usually a reduction in the number of units provided by the organizations.

Although the economy appears to be healthy in terms of job opportunities, the vast majority of jobs available are in lower-wage positions or education, according to the contact. The contact indicated that low- and moderate-income populations have been adjusting to rising living costs by adopting a multigenerational homes approach, in which families come together to live under one roof in efforts to make ends meet. The contact also indicated that critical needs include accessible mortgage products for low- and moderate-income first-time homebuyers using flexible lending practices, such as high loan-to-value tolerance and loans for individuals with low credit scores. There is also an ongoing need for mortgages that can be used in conjunction with government downpayment assistance programs, as well as financial services for families in the area that are unbanked and using check-cashing services or pay-day loan companies. An example noted was an account that could be zero-fee, low overdraft fees, and with low balance requirements.

Conclusions with Respect to Performance Tests in Houston

Lending Test

Lending test performance in Houston is outstanding. This assessment is primarily attributable to excellent overall geographic and borrower distributions of credit and leadership in making impactful community development loans in the assessment area and broader statewide/regional area. Data used for this analysis is on Tables 67 through 79.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs, considering the bank's relatively limited presence. Performance was assessed based on small business, home purchase, home mortgage refinance, and community development loans. Similar to California and New York, small

⁹⁷ Harris County Department of Economic Equity and Opportunity; found at https://deeo.harriscountytx.gov/Program-Planning-Innovation/Program-Summary

business lending levels increased significantly due to the bank's continued partnership with a non-profit organization that supports very small businesses. Data for this performance can be found on Table 67.

Lending Distribution by Geography

Overall lending distribution by geography within the Houston assessment area is excellent. As seen in Tables 68 through 73, EWB extended loans within census tracts of all income categories. Excellent performance was noted in small business lending, particularly in low- and moderate-income areas. The geographic distribution of home mortgage loans was generally good, with notable performance in distributions of home refinance loans early in the review period. Overall, lending patterns were excellent and displayed no unusual or conspicuous lending gaps. Lending distributions largely followed the locations of the EWB's branches and business and housing unit concentrations.

Small Business Lending

The geographic distribution of small business lending is excellent. EWB's performance in low and moderate-income census tracts was particularly strong with lending significantly exceeding the percentage of businesses in the area and aggregate lending performance for the duration of the review period. Performance in census tracts of all other income levels compared reasonably to the percentage of businesses and aggregate lending performance. Loans made through a partnership with a non-profit significantly enhanced the bank's performance. Tables 68 and 69 include data regarding small business lending.

Home Mortgage Lending

The geographic distribution of home purchase loans is adequate, given the declining housing affordability in the area and low percentage of owner-occupied housing units in low-income census tracts. Lending was distributed within census tracts of all income categories and there were no conspicuous lending gaps. Stronger performance was noted within low-income census tracts in 2020 through 2022, and moderate-income census tracts in 2022 and 2023, as the levels of lending in these years exceeded aggregate lending. Lending within all other census tracts was generally below the level of owner-occupied units and aggregate lending performance. Tables 70 and 72 show the data used for this analysis.

Home refinance lending distributions are good overall but varied during the review period. Particularly strong performance was noted in both low- and moderate-income geographies in 2020 and 2021, as distributions exceeded both aggregate lending and the percentages of owner-occupied units in those areas. Lending volume for this loan type was lower than home purchase loans but carried considerable weight in determining the overall lending performance. Data used for this analysis are also located on Tables 70 and 72.

Lending Distribution by Borrower Income and Business Revenue

Overall lending distribution by business revenue within the Houston assessment area is excellent. Due to the lack of data associated with the income-levels of mortgage borrowers as noted above, this analysis is focused on small business lending.

Small Business Lending

The distribution of loans to businesses of different revenue sizes is excellent. As shown on Tables 74 and 75, the percentage of lending to small businesses consistently and substantially exceeded aggregate lending. Performance in 2020 and 2021 trailed the performance demonstrated in 2022 and 2023; however, it is notable that the earlier years had a higher percentage of loans to businesses with revenues unknown. For the duration of the review period, lending volumes exceeded aggregate lending, and in 2022 and 2023, lending volumes also exceeded the representation of small businesses in low- and moderate-income areas. EWB's lending performance is enhanced by its partnership with a non-profit that serves very small businesses. This partnership helped increase lending to small businesses and increased the number of small business loans in smaller dollar amounts, which are identified credit needs.

Community Development Lending

EWB is a leader in making community development loans that exhibit excellent responsiveness to the community and credit needs of the Houston assessment area. As seen on Table 67, the bank extended 30 community development loans totaling \$146.3 million during the review period. Loans were responsive to a variety of community development needs, including affordable housing, economic development, and the revitalization and stabilization of certain geographies within the assessment area. During the period, these loans helped to finance 90 units of affordable housing and created or retained 1,375 jobs in the assessment area. Notable community development loans in Houston include the following:

- A \$12.3 million commercial real estate loan that helped stabilize a low-income geography within the assessment area by providing loan refinancing to support a multi-tenant retail shopping center located in the area.
- A \$8.3 million loan that helped stabilize a moderate-income geography within the assessment area by financing the acquisition of an owner-occupied industrial warehouse located in the area, allowing the borrower to expand storage and logistics operations.
- A \$2.9 million loan to a small business located within the assessment area to facilitate the
 acquisition of a warehouse to be used as an additional operating facility, retaining employment
 for 28 employees.
- A \$2.2 million loan to a small business operating in a low-income geography within the
 assessment area. The loan was used as working capital and supported the retention of 99 lowor moderate-income employees.
- A \$1.6 million refinance loan on a 48-unit multifamily apartment complex located in a moderate-income census tract. Of the 48 total units, 45 are likely to benefit low- and moderateincome households due to the rent prices and local demographics.

Investment Test

Performance under the investment test in the Houston assessment area is outstanding. EWB made excellent levels of qualified investments and grants that were responsive to a variety of community development needs within the assessment area. As seen in Table 92, the bank made \$78.7 million qualified investment and grants, of which \$34.2 million were new investments and \$43.2 million were made during a prior period that remained on the bank's books. The bank also made a number of grants

and donations to a variety of non-profit organizations serving the needs of low- and moderate-income individuals in Houston. Notable investments and grants include the following:

- A total of \$25.7 million of investments into CRA-eligible MBS where the underlying mortgages were made to low- or moderate-income borrowers or within low- or moderate-income geographies.
- A \$5.3 million investment into a fund that helped finance a LIHTC project within the assessment area that provided 90 affordable housing units for low- and moderate-income individuals and families.
- A \$1.6 million investment into a New Market Tax Credit fund that helped to support the
 operations of a Community Development Corporation located in the assessment area.
 Specifically, the investment helped to finance the construction of 17 homes for low- and
 moderate-income individuals in Harris County.
- A \$500,000 grant to an organization with a primary mission of providing assistance to lowincome entrepreneurial women, helping them build businesses and attain financial mobility.

Service Test

EWB's performance under the service test in the Houston assessment area is high satisfactory based the accessibility of delivery systems and the level of community development services provided.

Retail Banking Services

EWB's banking services are accessible to the bank's geographies and individuals of different income levels within the assessment area, and services do not vary in a way that inconveniences any portions of the area. A full array of personal and business banking products and services is offered at all locations in the Houston assessment area. In addition, delivery systems including nine ATMs, telephone banking, mobile and online banking, and remote deposit capture are offered to provide customers access to banking services after normal business hours. As seen on Table 93, branches are accessible to geographies and individuals of different incomes with the percentage of branches in low- and moderate-income areas comparing favorably to the percentage of the population in those areas. There were no changes to the bank's branches within the assessment area during the review period.

Community Development Services

EWB provided a relatively high level of services in the Houston assessment area that were responsive to community development needs. Employees engaged in over 100 services and provided over 1,046 service hours. These qualified services met a variety of community development needs, with the majority addressing the need for personal financial education for low- and moderate-income students and families and SBA lending product presentations to small businesses. Significant time was also devoted to providing free income-tax preparation assistance to low- and moderate-income individuals and families. The following are notable examples of community development services:

• Eight bank employees provided 22 hours of community development services by partnering with a community organization to host a virtual seminar for low-income individuals and families. The seminar was focused on planning for the unexpected and was provided in both Chinese and Vietnamese. The webinar was attended by 28 participants.

- Seven bank employees provided over 20 hours of community development services to local small business owners by hosting a webinar focused on the SBA, its products and various programs, and how the business owners can best position themselves to access them. The webinar also included information on options other than SBA loans that business owners can consider, and they can protect themselves against fraud.
- 11 bank employees provided 27 hours of community development services by partnering with a community organization and providing guidance to students of a Title I school located within the assessment area. Employees discussed their banking career paths emphasized the importance of education, as well as financial planning and budgeting.
- In partnership with local government and a non-profit organization, an EWB employee provided 25 hours of free tax services for low- and moderate-income individuals that resided within the assessment area. The employee enabled low-income families to retain the entirety of their tax refunds by ensuring that the qualified credits were applied.
- Six bank employees provided a total of 51 community service hours by partnering with a
 community organization in a series of financial literacy classes for the senior citizens cohort of a
 60-unit affordable senior housing apartment complex for low- and moderate-income individuals
 in the assessment area. The financial literacy sessions helped 25 senior citizens better
 understand credit and credit counseling. Employees also assisted with helping the individuals
 understand their personal credit scores and where to request a free credit report.

Limited-Scope Assessment Area Conclusions

*For each assessment area where a limited-scope review was performed using the examination procedures.

EWB's performance in the assessment area receiving a limited review is consistent with the performance in the area receiving a full-scope review. Due to the bank's smaller presence in this market and lower percentages of loans and deposits, the limited-scope assessment area received less weight than the full-scope area. Consequently, performance in this area did not materially affect the bank's overall lending, investment, and service test performance assessments. EWB operations are conducted through three full-service branches in the Dallas assessment area. Facts and data reviewed, including performance and demographic information, can be found in the tables accompanying this report.

Ехнівіт 28					
LIMITED-SCOPE ASSESSMENT AREA CONCLUSIONS					
ASSESSMENT AREA	ENT AREA LENDING TEST INVES		SERVICE TEST		
Dallas	Consistent	Consistent	Consistent		

East West Bank CRA Public Evaluation Pasadena, California August 12, 2024

STATE OF WASHINGTON

CRA Rating for Washington

Performance in Washington is rated "HIGH SATISFACTORY"

The lending test is rated: **High Satisfactory** The investment test is rated: **High Satisfactory** The service test is rated: **High Satisfactory**

The major factors supporting the institution's rating include:

- Lending levels that reflect good responsiveness to assessment area credit needs.
- Adequate geographic distributions of loans and distributions by borrower profile driven by small business lending.
- Relatively high levels of community development lending that exhibited good responsiveness to the need for affordable housing and economic development.
- Significant levels of qualified investments and grants that were responsive to a variety of community development needs.
- Reasonably accessible delivery systems for retail services including low- and moderate-income individuals and communities.
- Relatively high levels of community development services related to financial education for lowand moderate-income individuals and small businesses.

Scope of Examination

The scope of the examination for Washington is generally consistent with the overall scope of the CRA examination. The bank has one assessment area in the state of Washington. Although the bank's overall presence and certain types of loan activity in this area are limited, a full-scope review was conducted to determine the overall state rating. The lending test assessment was limited to the origination of small business, home purchase, home mortgage refinance, and community development loans. The bank extended too few home improvement and multi-family loans in the area to allow for a meaningful analysis. Accordingly, these loans were considered during the review, but did not influence the overall assessment. Home purchase and home mortgage refinance loans were evaluated for geographic distribution only, due to limited availability of borrower income information discussed previously.

Description of Operations in Washington

The Washington assessment area consists of King County and is part of the Seattle-Tacoma Bellevue, Washington MSA. As of July 1, 2023, the assessment area was home to an estimated 2.3 million people. 98 EWB operated four branches in the area that held \$1.9 billion in deposits, representing 1.8 percent of the deposit market share as of June 30, 2024. 99 By comparison, there were a total of 41 FDIC-insured financial institutions operating 444 offices with deposits totaling \$107.6 billion. 100

U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2023; available from: www.census.gov/quickfacts/.

Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2024; available from: https://banks.data.fdic.gov/bankfind-suite/SOD.

Ibid.

The Exhibit 29 below presents key demographic and business information used to help develop a performance context for the assessment area.

			Ехнів	ыт 29				
		Assess	MENT ARE	A DEMOGR	APHICS			
Income Categories	Tract Dis	WA tribution	Families	s by Tract Level a		< Poverty as % of by Tract	Families by Family Income	
	#	%	#	%	#	%	#	%
Low	24	4.8	22,076	4.1	3,747	17.0	106,704	20.0
Moderate	96	19.4	102,935	19.2	9,257	9.0	88,983	16.6
Middle	176	35.6	188,331	35.2	8,397	4.5	105,901	19.8
Upper	185	37.4	217,133	40.6	5,400	2.5	233,174	43.6
Unknown	14	2.8	4,287	0.8	411	9.6	0	0.0
Total AA	495	100.0	534,762	100.0	27,212	5.1	534,762	100.0
			ı	Hous	sing Type by	Tract		
	Housing Units by	Owner-occupied			Rer	ntal	Vacant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	46,487	12,849	2.5	27.6	30,984	66.7	2,654	5.7
Moderate	175,816	81,417	16.0	46.3	84,449	48.0	9,950	5.7
Middle	337,345	187,827	36.9	55.7	131,604	39.0	17,914	5.3
Upper	371,439	222,745	43.8	60.0	128,387	34.6	20,307	5.5
Unknown	21,257	3,508	0.7	16.5	16,291	76.6	1,458	6.9
Total AA	952,344	508,346	100.0	53.4	391,715	41.1	52,283	5.5
				Busin	esses by Tra	ct & Revenu	e Size	
		inesses by act		an or = lillion	Over \$1	Million	Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	8,333	6.0	7,321	5.6	962	11.5	50	4.4
Moderate	21,203	15.2	19,898	15.3	1,169	14.0	136	12.0
Middle	49,037	35.1	45,646	35.1	3,016	36.0	375	33.0
Upper	58,674	42.0	55,044	42.3	3,078	36.7	552	48.6
Unknown	2,386	1.7	2,212	1.7	152	1.8	22	1.9
Total AA	139,633	100.0	130,121	100.0	8,377	100.0	1,135	100.0
Percent	age of Total I	Businesses:		93.2		6.0		0.8
				Far	ms by Tract	& Revenue S	Size	
	Total Farn	ns by Tract				Million	Reveni Repo	ue Not orted

	#	%	#	%	#	%	#	%
Low	33	3.0	33	3.1	0	0.0	0	0.0
Moderate	129	11.6	128	11.9	1	2.8	0	0.0
Middle	466	41.9	447	41.6	18	50.0	1	100.0
Upper	473	42.6	457	42.6	16	44.4	0	0.0
Unknown	10	0.9	9	0.8	1	2.8	0	0.0
Total AA	1,111	100.0	1,074	100.0	36	100.0	1	100.0
Percentage of Total Farms:			96.7		3.2		0.1	

Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Economic Conditions

The review period in the Washington assessment area was marked primarily by the ongoing recovery from the pandemic, during which substantial contractions in employment and consumer spending occurred nationwide. The assessment area represents the largest population center in the state of Washington, and economic trends in the area have strong implications for statewide economic performance. The primary economic drivers in the area were the high-tech, manufacturing, and logistics industries. ¹⁰¹ In general, job growth in the area has closely tracked with regional trends, although some industry-specific challenges remain for the area's main employers. ¹⁰²

Economic activity has rebounded since the onset of the pandemic, although later years of the review period saw rising interest rates contracting funding for high-tech industry jobs. The high-tech sector, which is concentrated in the area's overall employment by industry at 8.7 percent versus 5.5 percent nationwide, experienced layoffs in 2023 and a subsequent reduction in payroll levels. However, the trend towards cloud-computing and increasing reliance upon technology services is anticipated to support the industry long-term despite short-term difficulties. The technology industry in the assessment area is well-established and anchored by two of the world's most valuable companies, which employ a combined 132,000 workers. However, the tech sector also have wider implications for consumer economic trends, as industries driven by consumer spending have experienced subsequent lags in income growth and payroll levels due to the retraction of investment in high-tech industry.

Manufacturing firms were also affected by the increase in interest rates that occurred later in the review period. One major employer in the area relocated approximately 10,000 manufacturing positions from the Puget Sound area to South Carolina, underscoring wider firm trends of moving away from high cost-of-business areas amid a decades-high interest rate environment.¹⁰⁶

¹⁰¹ Moody's Precis Report, Seattle-Bellevue-Everett, May 2024.

¹⁰² Ihid

¹⁰³ Moody's Precis Report, Seattle-Bellevue-Everett May 2024.

¹⁰⁴ Ibid.

¹⁰⁵ Ibid.

Moody's Precis Report, Seattle-Bellevue-Everett November 2023.

Due to the role of the Ports of Seattle and Tacoma, along with the strong presence of other manufacturing and logistics firms, area economic trends are tied with overseas economic trends, particularly those in China. Slowdowns in overseas economies have affected the export of goods that are manufactured in and transported through King County. International container volume in the Port of Seattle declined substantially over the review period from a 2021 high of 3 million containers to 2.2 million in 2023. 107

Housing prices in the assessment area remain greatly unaffordable, despite increasing interest rates, straggling home sales, and challenges in main employment industries putting downward pressure on sellers. Home prices in both the assessment area and the broader state area substantially exceeded the national peak of \$423,200 in 2022. ¹⁰⁸ The median home price in King County was \$850,000 in June 2024, which represents a 9.4 percent decrease from median prices one year prior. ¹⁰⁹ Home prices in the assessment area are significantly higher than those in the state, where the median home price was \$613,000 in 2023. ¹¹⁰

Census data shows that between 2015 and 2020, the local population was on the rise, with growth occurring at a pace of approximately 11 percent. Population growth in the assessment area was slightly higher than the state as a whole, which had increased by 10.3 percent during that same timeframe. Exhibit 30 below shows population growth within King County, as well as the state of Washington, between 2015 and 2020.

EXHIBIT 30 POPULATION CHANGE ASSESSMENT AREA: WASHINGTON							
Area 2015 Population 2020 Population Percent Change							
King County, WA	2,045,756	2,269,675	10.9%				
State of Washington	6,985,464	7,705,281	10.3%				

Source: 2011-2015 U.S. Census Bureau American Community Survey

2020 U.S. Census Bureau Decennial Census

Also, between 2015 and 2020, increases in median family incomes within the assessment area outpaced the growth of the state as a whole. The average median family increase across King County was 17.1 percent, which was above the statewide figure. Exhibit 31 on the following page reflects the change in median family income that occurred in the assessment area and the State of Washington during that timeframe.

Seaport Alliance 5-Year Cargo Volume History, available from https://www.nwseaportalliance.com/about-us/cargo-statistics

Federal Reserve Bank of St. Louis, Median Sales Price of Houses Sold for the United States, available from https://fred.stlouisfed.org/series/MSPUS#0.

Federal Reserve Bank of St. Louis, Median Listing Price in King County, WA, available from https://fred.stlouisfed.org/series/MEDLISPRI53033.

Washington State Office of Financial Management, Median Home Price in Washington, available from https://ofm.wa.gov/washington-data-research/statewide-data/washington-trends/economic-trends/median-home-price.

Ехнівіт 31							
Median Family Income Change							
ASSESSMENT AREA: WASHINGTON							
2015 Median Family 2020 Median Family Percent							
Area	Income	Income	Change				
King County, WA	\$105,819	\$123,939	17.1%				
State of Washington	\$80,878	\$92,422	14.3%				

Source: 2011 - 2015 U.S. Census Bureau American Community Survey

2016 - 2020 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

The cost burden for renters and owners indicates a need for affordable housing in the assessment area, particularly for low-income renters and owners who are spending 30 percent or more of their household income on housing. While affordable housing options for low-income populations in particular were scarce, it is notable that a majority of low- and moderate-income renters in the assessment area are considered cost burdened. Exhibit 32 below reflects the percentages of cost burdened renters and owners within King County and statewide.

Ехнівіт 32								
HOUSING COST BURDEN								
ASSESSMENT AREA: WASHINGTON								
	Cost Bu	Cost Burden - Renters Cost Burden - Owners						
		Moderate	All	Low Moderate All				
Area	Low Income	Income	Renters	Income	Income	Owners		
King County, WA	78.2%	53.5%	41.1%	69.2%	45.5%	23.4%		
State of Washington	77.7%	47.2%	42.9%	65.4%	40.6%	22.2%		

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

The number of small business loans originated within the area increased steadily between 2017 and 2021, generally keeping pace with statewide trends. Overall, the number of small business loans in King County in 2021 had increased by 42.7 percent from 2017 levels. Statewide trends were similar, with 2021 small business loan volumes in the state as a whole increasing by 44.8 percent from 2017 levels, as shown in Exhibit 33 below. Lending to small businesses is critical for the support of the local economy given that small businesses represented over 93 percent of all businesses in the assessment area, as reflected in Exhibit 29 above.

Ехнівіт 33							
SMALL BUSINESS LOAN TRENDS							
ASSESSMENT AREA: WASHINGTON							
Area 2017 2018 2019 2020 2021							
King County, WA	50,803	56,978	60,310	64,743	72,522		
State of Washington	124,702	137,483	147,250	156,842	180,536		

Source: Federal Financial Institutions Examination Council (FFIEC) Community Reinvestment Act Aggregate Data

Mortgage loan originations within the assessment aera experienced disruptions in 2021 and 2022 that resulted in slightly sharper declines than statewide trends. The largest growth by number of loans in

King County occurred in 2020, with an increase of 93.7 percent from the year before; however, mortgage loans extended within the assessment area in 2021 decreased by 7.6 percent from the year before, and mortgage loans in 2022 decreased by 64.6 percent from the year before. Exhibit 34 below reflects mortgage loans originated by financial institutions in the assessment area and the State of Washington during the period of 2018 through 2022.

Ехнівіт 34						
HOME MORTGAGE TRENDS						
ASSESSMENT AREA: WASHINGTON						
Area 2018 2019 2020 2021 202						
King County, WA	54,257	72,867	141,107	130,406	46,155	
State of Washington	201,880	267,712	473,766	447,958	180,093	

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act Loan/Application Records

Credit and Community Development Needs

The assessment area's high cost of living and expensive housing market exacerbate the need for affordable housing. As previously noted, the median home price, while decreasing somewhat since 2022, significantly outstrips the median home price both in the state and the nation at large. While the area benefits from high salaries associated with the high-tech industry, those in lower-paying occupations, such as the manufacturing sector, struggle to find affordable housing. According to U.S. Department of Housing and Urban Development data, 78.1 percent of low-income renters and 67.6 percent of low-income owners are considered cost-burdened, along with 51.7 percent of moderate-income renters and 45.6 percent of moderate-income owners.¹¹¹

Community contacts within the assessment area indicated that affordable housing was one of the main credit and community development needs. The contact stated that local community development organizations are willing to partner with local banks to find creative ways of making affordable housing projects work; however, pricing is challenging, and flexible mortgage products, along with flexible underwriting is needed.

Other community contacts also noted that many small businesses were still generally recovering from the severe contraction in business associated with the pandemic. Similar to challenges associated with affordable housing, traditional lending relationships are often more expensive for borrowers, so funding can be difficult for smaller entities to afford and therefore access. The contacts noted that special funding programs from banks would likely be helpful in meeting the credit needs of small firms in the assessment area, which include the need for grants and small dollar loans to help weather pandemic-related hardships.

¹¹¹ U.S Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Affordability Strategy

Conclusions with Respect to Performance Tests in Washington

Lending Test

EWB's lending test performance is high satisfactory. Performance ranged from adequate to high satisfactory with stronger performance in community development lending and the use of innovative or flexible lending practices in addressing the assessment area's credit needs.

Lending Activity

Lending levels reflect good responsiveness to the assessment area's credit and community development needs. EWB extended a good level of loans in this assessment area in light of the bank's limited presence in the market. Small dollar loans helped meet the credit needs of small businesses, and community development loans helped meet the need for affordable housing and the revitalization or stabilization of certain geographies in the assessment area. Loan volumes are presented on Table 94.

Lending Distribution by Geography

Lending distribution by geography within the Washington assessment area is generally good. Loans were made within census tracts of all income categories, consistent with the representation of business or housing unit concentrations. Overall, performance was good for both small business loans and home mortgage loans. Lending patterns generally followed the locations of EWB's branches, and there were no conspicuous gaps in lending.

Small Business Lending

The geographic distribution of small business lending is good, overall. Loan concentrations in low-income census tracts were good throughout the review period, exceeding the percentage of businesses in the area and the performance of aggregate lenders. Lending distributions in moderate-income census tracts compared reasonably to the concentrations of business and aggregate lender performance in 2020 and 2021; however, penetration of these geographies decreased significantly in 2021 and 2022. The lending patterns generally followed the locations of EWB's branches and business concentrations. Tables 95 and 96 depict the distribution of small business loans among geographies of different income levels.

Home Mortgage Lending

The geographic distributions of home purchase and home refinance loans are good. As shown in Tables 97 and 99, lending patterns generally followed the concentrations of owner-occupied housing units. There were reasonable percentages of loans in low-income census tracts, despite limited home lending opportunities in those areas. Loans in moderate-income census tracts were generally comparable to the percentage of owner-occupied housing units and aggregate lender performance. Particularly strong performance was noted in distributions of home refinance loans. The sole branch located in a low-income census tract is positioned in Seattle's International District, a particularly low-income area. Most of the area's other low-income census tracts are not within close proximity of an EWB branch.

Lending Distribution by Business Revenue

Lending distribution by business revenue within the Washington assessment area is adequate. This evaluation is limited to small business loans extended in 2022 and 2023, as a particularly high volumes of small business loans extended in 2020 and 2021 were made to businesses with revenues unknown.

Small Business Lending

The distribution of loans among businesses of different revenue sizes is adequate, overall. Lending distributions in 2022 and 2023 were significantly below the percentage of small businesses but generally comparable to aggregate lending in low- and moderate-income census tracts. In addition, a majority of loans extended throughout the duration of the review period were in amounts of \$100,000 and under. Small dollar loans were an identified credit need in the Washington assessment area.

Community Development Lending

EWB made a relatively high level of community development loans that exhibited good responsiveness to community credit needs. As seen on Table 94 the bank made 31 community development loans totaling \$159.6 million within the Washington assessment area. In addition to this number, the bank made 24 loans totaling \$71.8 million that benefited a broader statewide or regional area that includes the assessment area. The loans addressed a variety of community development needs including affordable housing, economic development, and support for non-profits that serve low- and moderate-income individuals. Notable community development loans in Washington include the following:

- A \$30 million refinance of a loan that facilitated the purchase and rehabilitation of a 208-unit multi-family complex located in a moderate-income census tract within the assessment area.
 The loan served to stabilize the geography and provided critical affordable housing units for lowand moderate-income households in the area.
- A \$15.7 million loan that helped revitalize and stabilize a low-income census tract within the
 assessment area by refinancing a loan on an anchored retail center located in a low-income
 tract. The retail center included a grocery store, fitness center, and coffee shop, among other
 tenants.
- A \$3.5 million loan to a small business within the assessment area to be used as working capital.
 The loan helped to retain employment for 50 current low- and moderate-income employees and expand capacity for the creation of more jobs.
- A \$2.6 million loan to a mixed-use retail and apartment complex located in a middle-income geography within the assessment area. The loan helped to facilitate 15 housing units within the complex that are rent restricted and reserved for low- and moderate-income individuals and families.
- A \$2.1 million portion of a larger, \$10.3 million loan that facilitated the acquisition of a 75-unit apartment complex in an upper income tract within the assessment area. Of the 75 total housing units, 15 units are designated as affordable housing and reserved for low- and moderate-income households.

Investment Test

EWB's community development investment performance within the Washington assessment area is high satisfactory. Considering its limited presence in the area, the bank made a significant level of qualified investments and grants that were responsive to a variety of needs in the community. As seen on Table 107, the bank made 54 investments totaling \$71.8 million, consisting of \$36.1 million of investments from a prior period and \$35.8 million in new investments including qualified donations to various organizations. Current period investments in the assessment area were primarily investments in CRA-eligible MBS. The bank also has nine investments totaling \$5.2 million from a prior period and \$4.8 million in new investments that benefited a broader statewide or regional area that includes the assessment area. Noteworthy examples of qualified investments include the following:

- A total of \$29.3 million in investments into CRA-eligible MBS where the underlying mortgages were made to low- or moderate-income borrowers or within low- or moderate-income geographies.
- A \$4.2 million investment into a fund that finances the purchase of municipal bonds that benefit low- or moderate-income communities within the Washington assessment area.
- A \$1.1 million investment into a New Market Tax Credit fund that financed the development of a 117,500 square foot hunger solutions center that provides critical services to low- and moderate-income individuals and families, as well as homeless populations, within the assessment area.

Service Test

EWB's service test performance in Washington is high satisfactory based on the reasonable accessibility of the bank's delivery systems and the level of community development service provided to the communities of the assessment area.

Retail Banking Services

EWB's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the Washington assessment area. Services do not vary in a way that inconveniences customers in the assessment area, particularly low- and moderate-income individuals and geographies. A full array of personal and business banking products and services is offered at all locations in the area. Services are consistent across the assessment area; extended hours on Friday and Saturday are also offered at the branch located in a low-income census tract. In addition, delivery systems including two ATMs, telephone banking, online banking and mobile are offered to provide customers access to banking services after normal business hours.

The distribution of branches provides reasonable access to banking services for low- and moderate-income geographies and low- and moderate-income individuals. The bank has four full-service branches in Washington, with one in a low-income census tract. The remaining three branches are located in upper-income census tracts, all of which are located in King County. As seen on Table 108, although only one branch is located in a low-income census tract, this is generally comparable to the percentage of the population that resides in low- and moderate-income geographies at 23.3 percent. There were no changes to the bank's branches within the assessment area during the review period.

Community Development Services

EWB provided a relatively high level of community development services in the Washington assessment area. During the review period, employees provided 26 services totaling over 396 service hours. The bulk of services included financial education presentations to low- and moderate-income individuals. The following are notable examples of community development services:

- 16 bank employees provided over 42 community development service hours by hosting an SBA Solutions for Small Businesses seminar. Bank employees presented an overview of SBA programs and services to over 60 small business owners and provided guidance on what types of programs/loans are suitable for different business owners.
- 12 bank employees provided 39 community development service hours by partnering with a
 community organization focused on providing services for children of low- and moderateincome families through virtual financial education events. Bank employees introduced
 55 young students from low-income families to U.S. currency and provided a virtual visit to learn
 about bank operations.
- 11 bank employees provided over 35 community development service hours hosting a virtual educational field trip for the students of a community organization that serves families from low- and moderate-income backgrounds. The field trip was focused on finance, and students learned about different currencies and various banking operations.
- Three bank employees provided 19 community development service hours volunteering in a
 budget training program for middle-school students of a Title I school within the bank's
 assessment area. Bank employees facilitated a workshop in which students gathered data on
 different income scenarios and developed budgets specific to each scenario. The event was
 attended by 60 students.
- Six bank employees provided 15 community development service hours by partnering with a
 local community organization and conducting mock interviews for young people from low- and
 moderate-income backgrounds. Bank employees provided instructions, career navigation,
 coaching, and mentoring for students interested in the banking sector. The event was attended
 by 23 students.

STATE OF GEORGIA

CRA Rating for Georgia

Performance in Georgia is rated "Outstanding"

The lending test is rated: Outstanding
The investment test is rated: High Satisfactory
The service test is rated: High Satisfactory

The major factors supporting the institution's rating include:

- Leadership in making community development loans that are responsive to the community and credit needs of the assessment area.
- Excellent distributions of loans by geographies of different income levels.
- Lending levels that exhibited good responsiveness to community credit needs and a substantial majority of loans extended within the assessment area.
- Significant levels of qualified investments and grants that were particularly responsive to the need for affordable housing.
- Reasonable access to retail services by individuals of different incomes and geographies of different incomes levels.
- Relatively high levels of community development services that provided financial education to low- and moderate-income individuals and small businesses.

Scope of Examination

The scope of the examination for Georgia is generally consistent with the overall scope of the CRA examination. The bank has one assessment area in the state of Georgia. Although the bank's overall presence and certain types of loan activity in this area are limited, a full-scope review was conducted to determine the overall state rating. The lending test assessment was limited to the origination of small business, home purchase, and home mortgage refinance loans because the bank extended too few home improvement and multifamily loans to allow for a meaningful analysis. Accordingly, although they were considered during the review, they did not influence the overall assessment.

Description of Operations in Georgia

The Georgia assessment area consists of 15 of the 29 counties in the Atlanta-Sandy Springs Alpharetta, Georgia MSA – Barrow, Bartow, Cherokee, Clayton, Cobb, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Paulding, Rockdale, and Spalding counties – in their entirety. As of 2023, the area was home to 5.5 million people. 112

U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2023; available from: www.census.gov/quickfacts/.

EWB operated three branches in the area and held \$1.5 billion in deposits, representing 0.7 percent of the deposit market share as of June 30, 2024. By comparison, there were a total of 74 FDIC-insured financial institutions operating 909 offices with deposits totaling \$218.1 billion in the assessment area. 114

Exhibit 35 below presents key demographic and business information used to help develop a performance context for the assessment area.

	EXHIBIT 35 ASSESSMENT AREA DEMOGRAPHICS GEORGIA ASSESSMENT AREA							
Income Categories	Tract Dis	istribution Families by Tract Income		Families < Poverty Level as % of Families by Tract			Families by Family Income	
	#	%	#	%	#	%	#	%
Low	111	8.3	76,515	6.0	20,096	26.3	271,514	21.5
Moderate	309	23.0	284,219	22.5	36,767	12.9	212,824	16.8
Middle	399	29.7	409,537	32.4	28,056	6.9	244,006	19.3
Upper	474	35.3	477,317	37.7	14,418	3.0	537,368	42.5
Unknown	51	3.8	18,124	1.4	3,987	22.0	0	0.0
Total AA	1,344	100.0	1,265,712	100.0	103,324	8.2	1,265,712	100.0
	Hausina			Housi	ing Type by	Tract		
	Housing Units by	0\	Owner-occupied		Rental		Vacant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	158,774	39,033	3.2	24.6	98,049	61.8	21,692	13.7
Moderate	493,744	222,993	18.5	45.2	227,635	46.1	43,116	8.7
Middle	618,977	400,980	33.3	64.8	180,067	29.1	37,930	6.1
Upper	735,766	523,544	43.5	71.2	166,297	22.6	45,925	6.2
Unknown	56,158	16,231	1.3	28.9	33,016	58.8	6,911	12.3
Total AA	2,063,419	1,202,781	100.0	58.3	705,064	34.2	155,574	7.5
	Total Busi	massas bu		Busin	esses by Tra	ct & Revenu	ie Size	
		inesses by act	Less Tha \$1 Mi	-	Over \$1	Million	Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	19,103	5.7	17,897	5.7	1,080	5.9	126	4.5
Moderate	73,286	21.9	68,770	21.9	3,975	21.6	541	19.2
Middle	96,056	28.7	90,984	29.0	4,335	23.6	737	26.1

Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2024; available from: https://banks.data.fdic.gov/bankfind-suite/SOD.

¹¹⁴ Ibid.

Upper	136,763	40.8	127,236	40.5	8,209	44.7	1,318	46.7
Unknown	9,888	3.0	9,020	2.9	765	4.2	103	3.6
Total AA	335,096	100.0	313,907	100.0	18,364	100.0	2,825	100.0
Percent	tage of Total	Businesses:		93.7		5.5		0.8
				Far	ms by Tract	& Revenue	Size	
	Total Farm	ns by Tract	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	43	2.9	43	3.0	0	0.0	0	0.0
Moderate	264	17.8	260	17.8	4	15.4	0	0.0
Middle	523	35.3	513	35.2	10	38.5	0	0.0
Upper	626	42.2	617	42.3	9	34.6	0	0.0
Unknown	27	1.8	24	1.6	3	11.5	0	0.0
Total AA	1,483	100.0	1,457	100.0	26	100.0	0	0.0
Percentage of Total Farms:			98.2		1.8		0.0	

Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Economic Conditions

As in other assessment areas, the review period was marked by ongoing recovery from the pandemic, although economic growth was curtailed by the rising interest rate environment, affecting major industry firms. Main economic drivers in the assessment area are the logistics and high-tech industries, although a strong healthcare presence is also notable. The local economy has appeared to largely rebound from the retraction during 2020 and 2021, although overall growth was slowed to average levels despite a prolonged period of outperformance among large metropolitan areas. The assessment area represents the largest population center in the state of Georgia, and the ninth largest MSA in the country and therefore the area's economic condition has strong implications for broader state, regional, and national performance.¹¹⁵

The logistics industry maintains a strong foothold in the assessment area, with main employers including major national firms. Furthermore, Hartsfield-Jackson International Airport is one of the busiest cargo airports in the world, further supporting the industry. During and immediately after the onset of the pandemic, the logistics industry experienced strong growth largely driven by a boom in e-commerce; however, overexpansion in payrolls have led to modest downsizing in the intervening period and area industry employment loss has outpaced the national average over the last year. 116

US Census Bureau, Metropolitan and Micropolitan Statistical Areas Population Totals: 2020-2023. Data available from https://www.census.gov/data/tables/time-series/demo/popest/2020s-total-metro-and-micro-statisticalareas.html#v2022.

Moody's Precis Report, Atlanta-Sandy Springs-Roswell, May 2024.

High-tech firms in the assessment area initially benefitted from low business costs and access to a deep talent pool;¹¹⁷ however, rising interest rates had curtailed investment in the later years of the review period, causing local firms to delay plans to expand because of the higher cost of business. Startup firms in particular struggled to find funding in this environment, including venture capital funding.¹¹⁸ Multiple large technology and technology-adjacent firms maintain operations in the area.¹¹⁹ The presence of several higher institutes of education also boosts the qualified technology labor force in the area.¹²⁰

Housing prices increased during the review period, although these increases were in line with state and national trends. Assessment area home prices were slightly elevated compared to statewide and national figures. Building for single-family homes has led to an increase in construction employment, as well. While cost of business in the assessment area is lower than the national average at 93 percent, cost of living is slightly elevated at 105 percent of the national average. Although the business environment remains attractive to employers, in-migration to the area is hampered by these increasing living and housing costs. Item 122

Population growth in the assessment area has been robust in recent years. The total population growth across the 15 counties between 2015 and 2020 was 10.2 percent. The area was among the largest population-gaining MSAs during the review period. Within the assessment area, population growth was centered in Forsyth and Cherokee counties. This is in line with broader regional trends, which demonstrate significant increases in domestic migration toward the U.S. South. Exhibit 36 below reflects population changes within the assessment area and State of Georgia between 2015 and 2020.

EXHIBIT 36 POPULATION CHANGE ASSESSMENT AREA: GEORGIA								
Area	2015 Population	2020 Population	Percent Change					
Georgia Assessment Area	4,896,224	5,395,887	10.2%					
Barrow County, GA	72,012	83,505	16.0%					
Bartow County, GA	101,336	108,901	7.5%					
Cherokee County, GA	225,944	266,620	18.0%					
Clayton County, GA	267,234	297,595	11.4%					
Cobb County, GA	719,133	766,149	6.5%					
DeKalb County, GA	716,331	764,382	6.7%					
Douglas County, GA	136,520	144,237	5.7%					
Fayette County, GA	108,655	119,194	9.7%					

¹¹⁷ Moody's Precis Report, Atlanta-Sandy Springs-Roswell, May 2022.

¹¹⁸ Moody's Precis Report, Atlanta-Sandy Springs-Roswell, May 2024.

¹¹⁹ Ibid

KnowAtlanta, Atlanta: The Tech Mecca of the Southeast. Available from: https://www.knowatlanta.com/features/atlanta-the-tech-mecca-of-the-southeast

¹²¹ Moody's Precis Report, Atlanta-Sandy Springs-Roswell, November 2023.

¹²² Ihid

US Census Bureau Library, America Counts: Stories, Sunshine State Home to Metro Areas Among Top 10 US Population Gainers from 2022 to 2023. Data available from: https://www.census.gov/library/stories/2024/03/florida-and-fast-growing-metros.html

¹²⁴ Ibid.

Forsyth County, GA	196,236	251,283	28.1%
Fulton County, GA	983,903	1,066,710	8.4%
Gwinnett County, GA	859,234	957,062	11.4%
Henry County, GA	211,512	240,712	13.8%
Paulding County, GA	147,400	168,661	14.4%
Rockdale County, GA	86,901	93,570	7.7%
Spalding County, GA	63,873	67,306	5.4%
State of Georgia	10,006,693	10,711,908	7.0%

Source: 2011-2015 U.S. Census Bureau American Community Survey

2020 U.S. Census Bureau Decennial Census

During the same timeframe, median family income in the assessment area increased substantially. As previously mentioned, the assessment area has historically been a center of economic and population growth both regionally and nationally. Median family incomes increased most significantly in DeKalb, Fulton, and Douglas Counties, as reflected in Exhibit 37 below. Growth in more lucrative industries in the assessment area, such as the technology sector, likely contributed to the increases.

EXHIBIT 37 MEDIAN FAMILY INCOME CHANGE ASSESSMENT AREA: GEORGIA								
Area	2015 Median Family Income	2020 Median Family Income	Percent Change					
Barrow County, GA	\$62,382	\$71,965	15.4%					
Bartow County, GA	\$62,057	\$70,686	13.9%					
Cherokee County, GA	\$87,479	\$97,543	11.5%					
Clayton County, GA	\$49,933	\$54,214	8.6%					
Cobb County, GA	\$86,129	\$99,099	15.1%					
DeKalb County, GA	\$65,776	\$82,234	25.0%					
Douglas County, GA	\$65,820	\$76,362	16.0%					
Fayette County, GA	\$99,509	\$109,267	9.8%					
Forsyth County, GA	\$110,520	\$125,609	13.7%					
Fulton County, GA	\$84,631	\$99,490	17.6%					
Gwinnett County, GA	\$72,393	\$82,919	14.5%					
Henry County, GA	\$72,360	\$80,348	11.0%					
Paulding County, GA	\$73,882	\$78,601	6.4%					
Rockdale County, GA	\$61,333	\$70,557	15.0%					
Spalding County, GA	\$53,412	\$58,486	9.5%					
State of Georgia	\$64,910	\$74,127	14.2%					

Source: 2011 - 2015 U.S. Census Bureau American Community Survey

2016 - 2020 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

The assessment area's unemployment rate has rebounded since the contraction during the pandemic, and in most cases has decreased beyond pre-pandemic levels. During the review period, the logistics industry was bolstered by increases in e-commerce and subsequently expanded payrolls; many of these

firms also overlap with high-tech firms, further spurring a demand for labor. While increasing cost of living has led to some slowdown in in-migration to the area, the area remains relatively affordable compared to other large MSAs in the country with comparable industry presence, increasing area attractiveness to workers. Exhibit 38 below reflects the unemployment rates within the assessment area and the State of Georgia from 2018 through 2022.

	Ехнівіт 38								
	UNEMPLOYMENT RATES								
ASSESSMENT AREA: GEORGIA									
Area	2018	2019	2020	2021	2022				
Barrow County, GA	3.3%	2.9%	5.0%	2.9%	2.5%				
Bartow County, GA	3.8%	3.4%	6.2%	3.5%	2.9%				
Cherokee County, GA	3.1%	2.9%	4.8%	2.6%	2.4%				
Clayton County, GA	4.9%	4.4%	10.3%	6.3%	3.9%				
Cobb County, GA	3.5%	3.1%	5.9%	3.2%	2.6%				
DeKalb County, GA	4.1%	3.6%	7.9%	4.5%	3.1%				
Douglas County, GA	4.2%	3.7%	7.3%	4.3%	3.2%				
Fayette County, GA	3.5%	3.1%	5.3%	2.9%	2.6%				
Forsyth County, GA	3.2%	2.9%	4.5%	2.5%	2.3%				
Fulton County, GA	4.1%	3.6%	7.9%	4.6%	3.2%				
Gwinnett County, GA	3.6%	3.2%	6.3%	3.5%	2.7%				
Henry County, GA	4.2%	3.7%	7.2%	4.2%	3.2%				
Paulding County, GA	3.5%	3.1%	5.3%	3.0%	2.6%				
Rockdale County, GA	4.4%	4.0%	7.5%	4.5%	3.5%				
Spalding County, GA	4.7%	4.2%	7.5%	4.6%	3.3%				
State of Georgia	4.0%	3.6%	6.5%	3.9%	3.0%				

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

The cost burden for renters indicates a need for affordable housing in the assessment area, as a majority of low- and moderate-income renters are spending 30 percent or more of their household income on rent. Affordable housing options for low-income individuals were scarce throughout the assessment area. The biggest affordable housing rental need for moderate-income individuals were located in Cobb, Gwinnett, Fulton, Fayette, Dekalb, and Forsyth counties. Exhibit 39 below reflects the percentages of cost burdened renters and owners within the assessment area and broader MSA, as well as statewide.

EXHIBIT 39 HOUSING COST BURDEN ASSESSMENT AREA: GEORGIA								
	Cos	t Burden - Rent	ers	Cost	Burden - Own	ers		
	Low	Moderate	All	Low	Moderate	All		
Area	Income	Income	Renters	Income	Income	Owners		
Barrow County, GA	72.7%	25.4%	41.7%	59.3%	26.5%	20.3%		
Bartow County, GA	78.0%	16.5%	40.2%	53.8%	11.9%	17.5%		
Cherokee County, GA	85.4%	47.7%	46.0%	65.7%	29.5%	16.4%		
Clayton County, GA	84.5%	27.8%	47.9%	64.3%	25.7%	23.5%		
Cobb County, GA	84.0%	59.9%	42.1%	65.0%	34.2%	16.9%		

DeKalb County, GA	81.4%	55.5%	48.6%	67.8%	37.1%	21.3%
Douglas County, GA	79.6%	37.5%	42.4%	61.2%	27.3%	17.6%
Fayette County, GA	86.0%	56.9%	38.7%	66.7%	41.3%	19.2%
Forsyth County, GA	77.4%	54.2%	41.2%	60.2%	42.4%	14.3%
Fulton County, GA	76.1%	57.9%	44.3%	65.1%	41.5%	20.1%
Gwinnett County, GA	87.1%	59.5%	48.7%	68.6%	41.5%	21.1%
Henry County, GA	83.7%	50.4%	41.7%	66.1%	36.6%	22.6%
Paulding County, GA	82.3%	37.5%	35.7%	61.9%	28.0%	18.4%
Rockdale County, GA	85.9%	39.1%	45.1%	53.3%	38.5%	21.9%
Spalding County, GA	69.9%	23.5%	45.9%	54.8%	15.7%	18.9%
State of Georgia	76.6%	45.9%	43.3%	59.1%	31.5%	18.8%

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

As depicted in Exhibit 40 below, the number of small business loans originated within the assessment area increased steadily over the course of the review period, keeping pace with statewide trends. Small business loans in the assessment area increased by 73.2 percent between 2017 and 2021, with the largest growth occurring in Clayton County. Within the state of Georgia, loans to small businesses increased by 66.5 percent during that same period. Lending to small businesses is critical for the support of the local economy given that small businesses represented 93.7 percent of all businesses in the assessment area, as depicted in Exhibit 35 above.

Ехнівіт 40									
Sm	ALL BUSINESS I	LOAN TRENDS							
ASSESSMENT AREA: GEORGIA									
Area	2017 2018 2019 2020 2								
Georgia Assessment Area	129,508	140,355	150,572	173,050	224,341				
Barrow County, GA	1,262	1,334	1,647	1,595	2,084				
Bartow County, GA	1,726	1,821	1,975	2,279	2,638				
Cherokee County, GA	6,099	6,399	6,931	7,819	8,754				
Clayton County, GA	3,324	3,537	3,914	4,868	8,834				
Cobb County, GA	20,612	22,252	23,389	26,483	32,776				
DeKalb County, GA	16,720	17,706	18,608	22,276	29,492				
Douglas County, GA	2,365	2,552	2,775	3,635	5,219				
Fayette County, GA	3,174	3,349	3,664	4,209	5,342				
Forsyth County, GA	7,293	8,015	8,537	9,331	10,486				
Fulton County, GA	33,822	36,736	39,113	46,439	58,130				
Gwinnett County, GA	24,709	27,578	29,737	32,017	42,698				
Henry County, GA	3,649	3,875	4,379	5,245	8,368				
Paulding County, GA	2,048	2,241	2,528	2,921	4,153				
Rockdale County, GA	2,016	2,040	2,325	2,656	3,807				
Spalding County, GA	689	920	1,050	1,277	1,560				
State of Georgia	198,574	214,421	229,398	263,667	330,726				

Source: Federal Financial Institutions Examination Council (FFIEC) Community Reinvestment Act Aggregate Data

Throughout the review period, mortgage loan originations within the assessment area tended to increase at a slower rate than the state average. Larger growth by number of loans occurred in Spalding and Clayton counties, with an increase of 32.1 percent and 30.1 percent, respectively, between 2018 and 2022. Within the assessment area overall, mortgage loans increased by 6.6 percent. During that same timeframe, mortgage loans in the State of Georgia increased by 11.5 percent. Exhibit 41 below reflects mortgage loans originated by financial institutions in the assessment area the State of Georgia between 2018 and 2022.

EXHIBIT 41 HOME MORTGAGE TRENDS ASSESSMENT AREA: GEORGIA								
Area	2018	2019	2020	2021	2022			
Georgia Assessment Area	130,287	158,652	259,084	266,922	136,353			
Barrow County, GA	2,699	3,043	4,540	4,854	3,029			
Bartow County, GA	2,626	3,141	4,607	5,033	2,940			
Cherokee County, GA	8,533	10,988	18,723	18,067	8,915			
Clayton County, GA	4,113	5,049	6,470	7,604	5,353			
Cobb County, GA	19,161	23,563	40,619	39,684	18,812			
DeKalb County, GA	15,577	18,604	30,381	31,245	16,088			
Douglas County, GA	3,451	4,006	5,672	6,604	3,842			
Fayette County, GA	3,380	4,102	6,821	7,022	3,527			
Forsyth County, GA	8,360	10,895	21,897	20,309	8,100			
Fulton County, GA	24,945	31,194	51,503	52,394	25,732			
Gwinnett County, GA	22,073	25,570	40,560	43,817	22,099			
Henry County, GA	6,379	7,797	11,655	12,777	7,771			
Paulding County, GA	5,720	6,709	10,012	10,774	5,983			
Rockdale County, GA	1,998	2,432	3,521	4,166	2,481			
Spalding County, GA	1,272	1,559	2,103	2,572	1,681			
State of Georgia	225,881	270,736	429,248	458,517	251,977			

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act Loan/Application Records

Credit and Community Development Needs

Due to the geographic size and population of the Georgia assessment area, a variety of credit and community development needs are present. Approximately 10.4 percent of households in assessment area are below the poverty line. 125 However, only 1.5 percent of households receive public assistance. While the area generally maintains a lower cost of living comparable to other large MSAs, low- and moderate-income individuals and families struggle to find affordable housing. Within the assessment area, 81 percent of low-income renters, and 52 percent of moderate-income renters, are considered cost burdened. Cost burden is also felt substantially by low-income homeowners, at 64.7 percent, despite the cost burden of all owners at 19.4 percent. 126 One community contact in the area noted that historically underrepresented and underserved groups continue to struggle to access credit, particularly accessible home mortgage loans.

¹²⁵ 2023 Federal Financial Institutions Examination Council Census Data.

¹²⁶ US Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy.

Another contact indicated that small business access to credit was critical need within the assessment area. According to the contact, larger companies are operating in the local area; however, funding for the small business sector is lacking. The contact noted more frequent loan delinquencies and charge-offs, partly due to inflation effects, and stated that local companies need credit facilities and smaller dollar loans and grants to assist with the recovery from the pandemic. Another need is business advisory services, such as coaching and business support, according to the contact.

Conclusions with Respect to Performance Tests in Georgia

Lending Test

Lending test performance in Georgia is outstanding. Overall borrower lending distributions by geography are excellent, and the bank also made excellent levels of community development lending during the review period. Lending and demographic data used to assess EWB's lending test performance are on Tables 109 through 121.

Lending Activity

EWB extended an overall good number of small business, home mortgage, and community development loans in the assessment area, given the bank's limited presence in the sizable market. Information on the volume of loans is on Table 109.

Lending Distribution by Geography

Overall lending distributions by geography within the Georgia assessment area are excellent. Loans were made within all income categories, with excellent performance of small business and home refinance loans, and good performance of home purchase loans within low- and moderate-income census tracts. Data regarding geographic distributions for this assessment area are in Tables 112 and 114.

Small Business Lending

Overall, the distribution of small business lending in Georgia is excellent. As seen in Tables 110 and 111, loans were dispersed throughout census tracts of all income levels, with lending in low- and moderate-income census tracts, generally exceeding the percentage of businesses and the level of aggregate lending in those areas. Particularly strong performance was noted in 2020 and 2021.

Home Mortgage Lending

The distribution of home purchase and home refinance loans is excellent. This assessment is based upon an analysis of loan data contained on Tables 112 and 114. Lending levels in low- and moderate-income census tracts exceeded aggregate lending and the percentage of owner-occupied units. Performance in home purchase loans was notable in 2020 and 2021, while performance in home refinance loans was notable for the duration of the review period. This performance is partly attributable to a relatively more affordable housing market, along with the bank's special mortgage products for low- and moderate-income borrowers previously discussed.

Lending Distribution by Business Revenue

Overall lending distributions by business revenue and within the Georgia assessment area are good. The performance was driven by EWB's special loan programs targeted to very small businesses, including its partnership with an organization focused primarily on small businesses owned by women.

Small Business Lending

The distribution of loans to businesses of different revenue sizes is good overall. As reflected on Tables 116 and 117, lending was generally comparable to the concentration of businesses and compared well to aggregate lending with an increasing trend toward the end of the review period. While performance lagged aggregate lending in 2020 and 2021, it is notable that a large percentage of small business loans were made to businesses of unknown revenues during these years. In addition, the majority of loans were in small dollar amounts, which was identified as a credit need for small businesses in Georgia.

Community Development Lending

EWB is a leader in making community development loans that exhibiting excellent responsiveness to community credit needs in Georgia. As seen on Table 109, the bank made 48 community development loans totaling \$327.2 million within the Georgia assessment area. The loans addressed a variety of community development needs including affordable housing and stabilizing and revitalizing low- and moderate-income areas. Notable examples of community development loans include

- A \$50 million loan that helped to revitalize and stabilize a moderate-income geography by supporting a fast-growing local business that employs approximately 50 employees, serving to attract or retain both residents and businesses to the area.
- A \$17.4 million loan to finance the acquisition and rehabilitation, as well as the partial new
 construction, of a 98-unit affordable housing project consisting of two sites, both of which are
 located in a moderate-income census tract.
- A \$16.1 million loan to support the new construction of a 288-unit low-income housing tax credit project within the assessment area. The development is reserved for households with incomes of less than 60 percent of area median income.
- A \$11.5 million loan to help finance the construction of a 54-unit low-income housing tax credit project within the assessment area. The project targets households with incomes between 40 and 60 percent of area median income for 41 units.
- A \$10 million loan that helped to revitalize and stabilize a moderate-income census tract by
 providing working capital for a local business that employs approximately 500 employees. Loan
 serves to attract and/or retains local residents through job creations, including low- and
 moderate-income positions.

Investment Test

EWB's community development investment performance within the Georgia assessment area is high satisfactory. Considering its limited presence in the area, the bank made a significant level of qualified investments and grants that were responsive to a variety of needs in the community. As seen on

Table 109, the bank made 32 investments totaling \$158.8 million inside the assessment area, consisting of \$67.9 million that were made during prior periods that remain on the bank's books and \$90.8 million in new investments. As with other assessment areas, Georgia benefited from investments in regional funds that cover a broader statewide or regional area that includes the assessment area. Specifically, 10 qualified investments totaling \$8 million were made in the broader statewide or regional area that includes the assessment area. Examples of these investments include the following:

- A total of \$33.4 million in investments in CRA-eligible MBS where the underlying mortgages were made to low- or moderate-income borrowers or within low- or moderate-income geographies inside the bank's assessment area.
- A \$21.8 million investment in a LIHTC project located within the assessment area. The
 investment helped to develop a new family-oriented community that contained 98 new units of
 affordable workforce housing for individuals and families in need.
- A \$10.2 million investment in a LIHTC project located inside the assessment area. The
 investment helped fund the new development of a 5-story, 54-unit affordable housing
 apartment complex for low- and moderate-income individuals and families. Of the 54 units,
 41 were reserved for those earning less than 60 percent of area median income.

Service Test

EWB's performance under the service test in Georgia is high satisfactory based on the accessibility of delivery systems and level of community development services provided.

Retail Banking Services

EWB's banking services are reasonably accessible to the bank's geographies and to individuals of different income levels. Services do not vary in a way that inconveniences customers in the assessment area, particularly low- and moderate-income individuals and geographies. A full array of personal and business banking services – including those previously discussed – is offered at all locations in the Georgia assessment area. Branch hours include Saturday hours at two of the three branches, including one in a low-income census tract. In addition, delivery systems including ATMs at each branch, telephone banking, online and mobile banking, are offered to provide customers access to banking services after normal business hours.

EWB maintains three branches in this assessment area — one in a low-income census tract, one in a middle-income, and one in an upper-income census tract. As seen on Table 123, although only one of three branches is located in a low-income census tract, this is comparable to the percentage of the population that resides in low- and moderate-income geographies at 30.8 percent. Overall, given the bank's limited presence in the area, the distribution of branches provides reasonable access to banking services for low- and moderate-income geographies and individuals. There were no changes to the bank's branches within the assessment area during the review period.

Community Development Services

EWB provided a relatively high level of community development services to the Georgia assessment area. During the review period, employees provided 26 services for a total of 304 service hours. The bulk

of services involved providing financial education presentations to small businesses and low- and moderate-income individuals. Examples of qualified services provided include the following:

- Four bank employees provided a total of 26 community development service hours teaching financial education to students from local Title I schools. Employees facilitated real life scenarios for the students and provided information on budgeting and financial responsibility.
- Seven bank employees provided a total of 35 community development service hours by hosting an SBA loan seminar for local residents and small business owners in the assessment area.
 Employees presented information on Small Business Administration solutions for small businesses to attendees from various industries.
- Two bank employees provided 14 service hours by mentoring and teaching financial education
 to 64 middle school students from low- and moderate-income communities within the
 assessment area. Employees facilitated real life simulations to inform students on the cost and
 priority of different lifestyles (housing, transportation, insurance, savings, etc.), and the
 importance of budgeting. Employees also provided valuable insights by sharing what they
 learned through their own experiences.
- Four bank employees provided 12 service hours by hosting a First Time Homebuyer webinar for local residents of the assessment area. Bank employees presented information on its own Home Ready Affordable Housing loan program to educate attendees preparing for homeownership. The presentation explained the advantages and disadvantages of renting versus owning a home, and also provided attendees methods of determine their own readiness to buy a home.
 Employees also provided one-on-one counseling for attendees with refinance and follow-up questions.

STATE OF MASSACHUSETTS

CRA Rating for Massachusetts

Performance in Massachusetts is rated "OUTSTANDING"

The lending test is rated:

Outstanding

The investment test is rated:

Outstanding

The service test is rated:

High Satisfactory

The major factors supporting the institution's rating include:

- Levels of lending that demonstrated excellent responsiveness to community credit needs and a substantial majority of loans extended within the assessment area.
- Excellent distributions of loans by geography and by commercial borrowers of different revenue sizes.
- Relatively high levels of community development loans that exhibited good responsiveness to the needs of low- and moderate-income individuals and small businesses.
- Excellent levels of qualified investments and grants that addressed the need for economic development and affordable housing, as well as other needs.
- Reasonably accessible delivery systems for banking services to geographies and individuals of different incomes and relatively high levels of community development services.

Scope of Examination

The scope of the examination for Massachusetts is generally consistent with the overall scope of the CRA examination. The bank has one assessment area in the state of Massachusetts. Although the bank's overall presence and lending activity in this area are limited, a full-scope review was conducted to determine the overall state rating. Lending activity for some loan types was nominal. Consequently, the lending test was limited to small business, home purchase, home mortgage refinance, and community development loans.

Description of Operations in Massachusetts

The Massachusetts assessment area is comprised of Middlesex, Norfolk, and Suffolk counties. As of July 1, 2023, the area was home to 3.1 million people. EWB operated two branches in the area which together held \$734.9 million in deposits, representing 0.17 percent of the deposit market share as of June 30, 2024. In comparison, there were a total of 81 FDIC-insured financial institutions operating 892 offices within the area, with deposits totaling over \$432.1 billion. 129

¹²⁷ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2023; available from: www.census.gov/quickfacts/.

Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2024; available from: https://banks.data.fdic.gov/bankfind-suite/SOD.

¹²⁹ Ibid.

Exhibit 42 below presents key demographic and business information used to help develop a performance context for the assessment area.

		Assess	Exhibi MENT AREA MASSACI	DEMOGR	APHICS				
Income Categories	Tract Dis	tribution		Families by Tract Income		< Poverty as % of by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%	
Low	70	9.4	54,474	7.5	12,401	22.8	159,338	22.0	
Moderate	126	16.9	118,786	16.4	12,641	10.6	112,003	15.5	
Middle	235	31.5	250,254	34.5	10,885	4.3	140,311	19.4	
Upper	276	37.0	294,314	40.6	7,251	2.5	313,127	43.2	
Unknown	39	5.2	6,951	1.0	841	12.1	0	0.0	
Total AA	746	100.0	724,779	100.0	44,019	6.1	724,779	100.0	
				Hous	ing Type by	Tract			
	Housing Units by	O	wner-occupi	vner-occupied Rental			Vacant		
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	105,393	21,478	3.2	20.4	76,089	72.2	7,826	7.4	
Moderate	223,728	85,891	12.7	38.4	124,248	55.5	13,589	6.1	
Middle	433,552	248,764	36.7	57.4	164,888	38.0	19,900	4.6	
Upper	481,464	316,999	46.7	65.8	137,436	28.5	27,029	5.6	
Unknown	18,552	5,119	0.8	27.6	11,883	64.1	1,550	8.4	
Total AA	1,262,689	678,251	100.0	53.7	514,544	40.7	69,894	5.5	
				Busin	esses by Tra	ct & Revenu	e Size		
	Total Busi Tra	•	Less Th \$1 M		Over \$1	Million	Reven Repo		
	#	%	#	%	#	%	#	%	
Low	7,672	4.9	7,000	5.0	626	4.2	46	4.2	
Moderate	20,409	13.0	18,373	13.0	1,913	12.7	123	11.1	
Middle	52,360	33.4	46,600	33.1	5,465	36.2	295	26.7	
Upper	73,803	47.0	66,484	47.2	6,701	44.4	618	56.0	
Unknown	2,732	1.7	2,337	1.7	373	2.5	22	2.0	
Total AA	156,976	100.0	140,794	100.0	15,078	100.0	1,104	100.0	
Percent	age of Total I	Businesses:		89.7		9.6		0.7	

			Farms by Tract & Revenue Size					
	Total Farm	ns by Tract		Less Than or = \$1 Million		Over \$1 Million		ue Not orted
	#	%	#	%	#	%	#	%
Low	21	3.1	21	3.2	0	0.0	0	0.0
Moderate	59	8.7	57	8.7	2	10.0	0	0.0
Middle	209	30.9	199	30.3	10	50.0	0	0.0
Upper	381	56.4	373	56.9	8	40.0	0	0.0
Unknown	6	0.9	6	0.9	0	0.0	0	0.0
Total AA	676	100.0	656	100.0	20	100.0	0	0.0
Per	centage of T	otal Farms:		97.0		3.0		0.0

Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Economic Conditions

During the review period, the area economy transitioned from recovery, following the sharp contraction triggered by the pandemic, into a phase of mid-expansion and ultimately late expansion of the business cycle. Economic drivers in the area were technology, healthcare, education, and finance. The local economy relies heavily on the technology industry, bolstered by the area's proximity to Harvard University, Massachusetts Institute of Technology, and leading biotech and information technology companies. Technology employment surpassed pre-pandemic levels by over five percent in late 2021 and seven percent by mid-2022, supported by robust growth in scientific research roles related to biotech. However, employment growth faced headwinds as financial conditions tightened, with rising interest rates and volatile equity prices making it difficult for startups to secure financing. However, employment growth information technology-related sectors and over-hiring by larger firms in the area further dampened growth. Despite average annual technology wages nearing \$200,000, a slowdown in job creation served to cap the broader economy.

The finance industry experienced moderate growth during the review period, supported by strong equity prices and a significant presence of investment managers and custodian banks. ¹³⁶ However, rising competition from passing funds, tightening monetary policy, and outflows of remote workers limited hiring and pushed firms to expand outside the assessment area. ¹³⁷ The area experienced population declines as the continued outflow of remote workers weighed on the local service recovery. ¹³⁸

¹³⁰ Moody's Precis Report, Boston MA, November 2021.

¹³¹ Ibid.

Moody's Precis Report, Boston MA, May 2022.

¹³³ Moody's Precis Report, Boston MA, November 2022.

¹³⁴ Moody's Precis Report, Boston MA, May 2024.

¹³⁵ Ibid

¹³⁶ Moody's Precis Report, Boston MA, May 2023.

¹³⁷ Moody's Precis Report, Boston MA, May 2024.

Moody's Precis Report, Boston MA, November 2022.

Population growth resumed in 2023, driven by robust international immigration and the slowing of domestic out-migration, boosting demand for local services and supporting economic recovery. The housing market experienced strong price appreciation in 2021 but began to slow in 2022 as residential construction decelerated and single-family housing prices declined alongside nationwide trends. Multi-family housing faced tight supply and low vacancy rates, with construction growth lagging behind national averages, exacerbating affordability challenges. By the end of the review period, housing prices rose above the national average but did not recover as strongly as other regions, reflecting a slower recovery. Solve the national average but did not recover as strongly as other regions, reflecting a slower recovery.

Census data shows that between 2015 and 2020, the assessment area population was on the rise, with growth occurring on average at a pace of approximately 5.2 percent. Population growth was slightly higher than the state as a whole, which had increased by 4.8 percent during that same timeframe. Exhibit 43 below shows population growth within the assessment area, as well as the state of Massachusetts, between 2015 and 2020.

Exhibit 43 Population Change Assessment Area: Massachusetts									
Area 2015 Population 2020 Population Percent C									
Middlesex County, MA	1,556,116	1,632,002	4.9%						
Norfolk County, MA	687,721	725,981	5.6%						
Suffolk County, MA	758,919	797,936	5.1%						
State of Massachusetts	6,705,586	7,029,917	4.8%						

Source: 2011-2015 U.S. Census Bureau American Community Survey

2020 U.S. Census Bureau Decennial Census

Between 2015 and 2020, increases in median family incomes within the assessment area generally outpaced the growth of the state as a whole. The average median family increase across the assessment area was approximately 16.1 percent, which was above the statewide figure of 12 percent. Suffolk County experienced significant increase in median family income, at 28.3 percent; however, its 2020 median family income level remained substantially lower than the statewide average. Norfolk County growth rate was significantly lower than the statewide average, indicating slower income expansion despite having one of the highest 2020 median family incomes. Exhibit 44 on the following page reflects the change in median family income that occurred in the assessment area and the State of Massachusetts during that timeframe.

¹³⁹ Moody's Precis Report, Boston MA, May 2024.

¹⁴⁰ Moody's Precis Report, Boston MA, November 2022.

¹⁴¹ Moody's Precis Report, Boston MA, May 2022.

¹⁴² Ibid.

¹⁴³ Moody's Precis Report, Boston MA, May 2024.

Exhibit 44 Median Family Income Change Assessment Area: Massachusetts								
2015 Median Family 2020 Median Family Percent								
Area	Income	Income	Change					
Middlesex County, MA	\$117,749	\$132,362	12.4%					
Norfolk County, MA	\$123,030	\$132,514	7.7%					
Suffolk County, MA	\$67,794	\$86,980	28.3%					
State of Massachusetts	\$95,147	\$106,526	12.0%					

Source: 2011 - 2015 U.S. Census Bureau American Community Survey

2016 - 2020 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

Exhibit 45 below the unemployment rate of the assessment area and the State of Massachusetts. Unemployment rates in the assessment area remained relatively aligned with the overall statewide figures. The assessment area unemployment rate was steady from 2018 to 2019, before experiencing an increase in 2020 due to the pandemic. Unemployment rates consistently declined after 2020; however, none have completely recovered to pre-pandemic levels.

EXHIBIT 45 UNEMPLOYMENT RATES ASSESSMENT AREA: MASSACHUSETTS										
Area 2018 2019 2020 2021 2022										
Middlesex County, MA	2.8%	2.4%	7.7%	4.5%	3.1%					
Norfolk County, MA	3.1%	2.6%	8.8%	5.0%	3.3%					
Suffolk County, MA	3.1%	2.7%	10.3%	5.7%	3.6%					
State of Massachusetts	3.5%	3.0%	9.4%	5.5%	3.8%					

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

The cost burden for renters and owners indicates a need for affordable housing in the assessment area, as many low-, and moderate-income renters and owners are spending 30 percent or more of their household income on housing. Affordable housing options for low-income populations in particular were scarce, and a good majority of both low- and moderate-income renters in the assessment area and the state are considered cost burdened. Exhibit 46 below reflects the percentages of cost burdened renters and homeowners within the assessment area and statewide.

		_							
Ехнівіт 46									
HOUSING COST BURDEN									
ASSESSMENT AREA: MASSACHUSETTS									
	Cost Burden - Renters Cost Burden - Owners								
	Low	Moderate	All	Low	Moderate	All			
Area	Income	Income	Renters	Income	Income	Owners			
Middlesex County, MA	72.0%	49.5%	40.4%	74.6%	43.9%	23.2%			
Norfolk County, MA	71.3%	49.9%	42.7%	76.4%	44.6%	24.7%			
Suffolk County, MA	68.3%	49.1%	44.8%	72.7%	47.7%	27.6%			

State of Massachusetts	70.6%	42.1%	43.9%	73.9%	44.2%	24.6%
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Cost Burden is housing cost that equals 30 percent or more of household income.

Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

The number of small business loans originated within the assessment area increased steadily between 2017 and 2021, generally keeping pace with statewide trends. Within all counties of the assessment area, growth was greatest in 2020, with an increase of 18.6 percent from the year before. Overall, the number of small business loans in the area in 2021 increased by 38.2 percent from 2017 levels. Statewide trends were similar, with 2021 small business loan volumes in the state as a whole increasing by 38.9 percent from 2017 levels, as shown in Exhibit 47 below. Lending to small businesses is critical for the support of the local economy given that small businesses represented 89.7 percent of all businesses in the assessment area, as reflected in Exhibit 42 above.

Ехнівіт 47										
SMALL BUSINESS LOAN TRENDS ASSESSMENT AREA: MASSACHUSETTS										
ASSESSMENT AREA: IVIASSACHUSETTS Area 2017 2018 2019 2020 2021										
Massachusetts Assessment Area	72,548	75,801	81,531	96,659	100,235					
Middlesex County, MA	38,053	40,345	43,316	50,697	52,040					
Norfolk County, MA	17,852	18,364	19,873	23,134	24,336					
Suffolk County, MA	16,643	17,092	18,342	22,828	23,859					
State of Massachusetts	146,772	154,674	166,020	194,025	202,500					

Source: Federal Financial Institutions Examination Council (FFIEC) Community Reinvestment Act Aggregate Data

Mortgage loan originations within the assessment area experienced disruptions in 2021 and 2022 that resulted in slightly sharper declines than statewide trends. Within the combined assessment area, the largest growth by number of loans occurred in 2020, with an increase of 77 percent from the year before; however, mortgage loan growth leveled in 2021, and decreased by 60.1 percent in 2022 from the year before. During that same timeframe, mortgage loans in the state of Massachusetts experienced similar fluctuations. Exhibit 48 below reflects mortgage loans originated by financial institutions in the assessment area and the State of Massachusetts during the period of 2018 through 2022.

Ехнівіт 48									
HOME MORTGAGE TRENDS									
ASSESSMENT AF	REA: MASSACHU	ISETTS							
Area 2018 2019 2020 2021 20									
Massachusetts Assessment Area	60,421	81,175	143,688	137,243	54,216				
Middlesex County, MA	32,477	43,736	80,250	75,434	29,224				
Norfolk County, MA	15,726	21,845	39,047	36,647	13,898				
Suffolk County, MA	12,218	15,594	24,391	25,162	11,094				
State of Massachusetts	144,166	188,114	321,689	315,921	135,040				

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act Loan/Application Records

Credit and Community Development Needs

A community contact associated with a local community development financial institution (CDFI) indicated that there is high demand for affordable housing and flexible or innovative lending products targeted to low- and-moderate income individuals in the assessment area, as many individuals living in the area do not make enough to qualify for traditional mortgage products. The contact identified providing low-cost, risk tolerant capital to CDFIs as well as equity investments and project-related investments as an opportunity for banks to address community needs.

Another community contact noted that the first-time homebuying process has become increasingly complicated, with lenders often overwhelmed by the process and consumers struggling to understand follow-through processes and requirements. In addition, the contact noted an increasing number of borrowers purchasing homes that need extensive repairs that the borrowers are unable to afford. This highlights the need for financial education, for both borrower and lenders, according to the contact.

Conclusions with Respect to Performance Tests in Massachusetts

Lending Test

Lending test performance in Massachusetts is outstanding. Overall geographic lending distributions are excellent and small business borrower distributions by revenue are also excellent, along with a substantial majority of loans extended within the assessment area. In addition, relatively high levels of community development loans were extended during the review period. Lending and demographic data used to assess EWB's lending test performance are in Tables 124 through 136.

Lending Activity

Lending levels demonstrated excellent responsiveness to assessment area credit needs, particularly in small business lending. As seen on Tables 124, EWB extended excellent levels of small business and home mortgage loans and relatively high level of community development loans, considering its limited presence in this competitive market.

Lending Distribution by Geography

Overall lending distributions of loans by geography are excellent, primarily driven by small business loans extended during the review period. Loans were made throughout the assessment area to include low- and moderate-income census tracts. There were no conspicuous lending gaps and lending patterns generally followed the locations of EWB branches and businesses or owner-occupied housing units. The bank performed well in low- and moderate-income census tracts through its extension of small business loans and home mortgage loans.

Small Business Lending

The geographic distribution of small business loans is excellent. As seen on Tables 125 and 126, loans were extended in census tracts of all income levels and the distribution of loans within low- and moderate-income census tracts far exceeded the representation of businesses as well as aggregate lending in those areas. This performance is attributable to the bank's partnership with a non-profit that

serves very small businesses. Lending levels in low- and moderate-income census tracts were strong for the duration of the review period.

Home Mortgage Lending

The geographic distribution of home purchase loans is good. As seen on Tables 127 and 129, performance was consistent throughout the review period but was particularly good within moderate-income census tracts compared to owner-occupied housing units and aggregate lenders in those areas.

The geographic lending distribution for home mortgage refinance loans is also good. As seen on Tables 127 and 129, particularly strong performance was demonstrated in low- and moderate-income census tracts during 2020 and 2021, as lending levels were above both owner-occupied units and aggregate lending.

Lending Distribution by Business Revenue

Lending distributions by revenue size is excellent. Performance was particularly strong as a large number of loans were made to very small businesses. This assessment is focused on small business loans as EWB does not generally collect borrower income for home mortgage loans; however, the bank did make targeted purchases of home purchase and home refinance loans made to low- and moderate-income borrowers that demonstrated favorable comparisons to the percentage of families and aggregate lending. Overall performance was driven by the bank's small business lending, which was particularly impactful.

Small Business Lending

The distribution of loans to businesses of different revenue sizes is excellent, as reflected on Tables 131 and 132. Similar to other assessment areas, EWB's partnership with a non-profit that serves very small businesses enhanced overall performance. Lending distributions to small businesses in the Massachusetts assessment area significantly exceeded the concentration of aggregate lenders concentrations of businesses for the duration of the review period. In addition, a substantial majority of loans were in small dollar amounts, which are responsive to the credit needs of small businesses.

Community Development Lending

EWB had a relatively high level of community development I during the review period, given its limited presence in the state. As seen on Table 124, the bank made 12 community development loans totaling \$132.8 million within the State of Massachusetts. Of these, two loans totaling \$25 million were made within the bank's assessment areas, and 10 loans totaling \$107.7 million were made in the broader statewide region that includes the bank's assessment area. The high loan amounts made inside the assessment area helped to address the community development need of affordable housing. The community development loans made inside the assessment area are as follows:

 A \$22 million loan to a community development institution focused on the development of multifamily affordable housing projects, primarily through the low-income housing tax credit program. • A \$3 million loan to a real estate developer that specializes in developing affordable housing units through the low-income housing tax credit program within the assessment area. At the time of the loan, the developer had seven affordable housing projects in the pipeline.

Investment Test

EWB's community development investment performance within the Massachusetts assessment area is high satisfactory. Considering its limited presence in the area, the bank made a significant level of qualified investments and grants that were responsive to a variety of needs in the community. As seen on Table 137, the bank made a total of 34 investments and grants totaling \$18.8 million that benefited the assessment area. These investments were comprised of \$15.2 million in new investments and donations, and \$3.6 million in investments made during a prior period that remain on the bank's books. EWB also invested \$16.7 million, comprised of \$12.2 million new investments and \$4.5 million during a prior period, that benefited a broader statewide or regional area to include the assessment area.

These investments were made in a variety of financial instruments that are not routinely provided by private investors and were comprised of LIHTCs, SBICs, and MBS. The investments were responsive to a variety of community development needs with a focus on affordable housing for low- and moderate-income individuals and economic development. Examples include:

- A total of \$4.9 million in new investments into CRA-eligible MBS where the underlying mortgages were made to low- or moderate-income borrowers or within low- or moderate-income geographies.
- An \$7.8 million investment into a Historic Rehabilitation Tax Credit project that helped to revitalize a low-income neighborhood within the assessment area. The investment helped to renovate and redevelop a historic 42,403 square foot theatre that seats an audience of 750, increasing the number of performances shown and expanding educational programs.
- A \$2 million investment into a New Market Tax Credit Fund that helped revitalize and stabilize a
 low-income neighborhood in the assessment area. The investment funded the expansion of staff
 for education, community, and workforce development programs that serve low- and
 moderate-income individuals and families.

Service Test

EWB's performance under the service test in Massachusetts is high satisfactory based on the accessibility of its delivery systems and level of community development services provided within the assessment area during the review period.

Retail Banking Services

EWB's banking services are reasonably accessible to the bank's geographies and to individuals of different income levels within the Massachusetts assessment area and do not vary in a way that inconveniences any portion of the area. A full array of personal and business banking products and services – including those previously discussed – is offered at each location in the area. Services are consistent across the assessment area and include hours on Saturday and Sunday. In addition, delivery systems including two ATMs, telephone, online, and mobile banking are offered to provide customers access to banking services after normal business hours.

EWB has two branches in Massachusetts, one in a low-income census tract and one in a middle-income census tract. Although the bank has a limited presence in the area, the branches provide reasonable access to banking services for low- and moderate-income individuals and geographies. While EWB maintains one branch in a low- or moderate-income area, the other the branch is in close proximity to a cluster of low- and moderate-income neighborhoods, which increases access for low- and moderate-income populations. There were no changes to the bank's branches within the assessment area during the review period.

Community Development Services

EWB provided a relatively high level of community development services in the assessment area, considering its small presence. Bank employees provided 24 services for a total of 220.5 service hours during the review period. These community development services met a variety of needs of low- and moderate-income individuals and small businesses. The bulk of the services involved providing financial education presentations to low- and moderate-income individuals and small businesses. A bank employee also took on a leadership role for one of the organizations as a board member and financial advisor. Examples of the types of community development services provided follow.

- Five EWB employees provided a total of 28 community development service hours by hosting
 two First Time Homebuyer and Bridge to Home Loan webinars for local residents in low-income
 tracts of the assessment area. Bank employees presented information on the loan programs to
 educate attendees preparing for homeownership and provided individual counseling during
 follow-up consultations.
- Seven bank employees provided a total of 25.5 community development service hours by
 hosting a webinar focused on the SBA for small business owners. Bank employees provided an
 overview of the administration's programs and services offered. Employees also provided
 individual follow-up consulting in relation to attendees' specific business types, as needed. The
 webinar was attended by 17 small business owners from various industries.
- Three bank employees provided a total of 10.5 community development service hours by teaching a financial education session for low-income senior citizens located in the assessment area. Bank employees partnered with an organization that is focused on promoting the general welfare of Asian elders. Bank employees prepared and facilitated presentations on financial literacy, identity theft and adult abuse programs to the 19 seniors who attended the event.
- One EWB employee provided a total of 21 community development service hours by providing technical expertise through sitting as a board member for a nonprofit organization focused on helping low- and moderate-income Chinese individuals and families integrate into their local communities.

East West Bank
Pasadena, California
CRA Public Evaluation
August 12, 2024

STATE OF NEVADA

CRA Rating for Nevada

Performance in Nevada is rated "SATISFACTORY"

The lending test is rated: High Satisfactory
The investment test is rated: High Satisfactory
The service test is rated: High Satisfactory

The major factors supporting the institution's rating include:

- Excellent lending levels despite the bank's limited presence in the state.
- Good distributions of loans among geographies of different income levels.
- Adequate distributions of loans by borrowers of different revenue sizes.
- Relatively high levels of community development loans that were responsive to the community and credit needs of the assessment area.
- Significant levels of qualified investments and grants that were responsive to a variety of community development needs.
- Reasonable accessibility of banking services with relatively high levels of community development services provided during the review period.

Scope of Examination

The scope for the examination for Nevada is generally consistent with the overall scope of the CRA examination. The bank has one assessment area in the state of Nevada. Although the bank's overall presence and loan activity is limited, a full-scope review was conducted to determine the overall state rating. The lending test assessment was limited to small business, home purchase, home refinance, and community development loans. Home improvement and multi-family loans were considered but did not influence the overall assessment due to their limited volume.

Description of Operations in Nevada

The Nevada assessment area is comprised of Clark County and is part of the Las Vegas Henderson-Paradise, Nevada MSA. As of July 1, 2023, the area was home to an estimated 2.3 million people. During the review period, the bank operated one office in Clark County that held \$346.4 million in deposits, representing 0.38 percent of the deposit market share as of June 30, 2024. By comparison, there were a total of 43 FDIC-insured financial institutions operating 274 offices within Clark County, with deposits totaling over \$91.5 billion. 146

¹⁴⁴ U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2023; available from: www.census.gov/quickfacts/.

Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2024; available from: https://banks.data.fdic.gov/bankfind-suite/SOD.

¹⁴⁶ Ibid.

Exhibit 49 below presents key demographic and business information used to help develop a performance context for the assessment area.

Exhibit 49 ASSESSMENT AREA DEMOGRAPHICS								
Income Categories	Tract Dis		Families	EVADA ASSESSMENT AREA Families by Tract Income		< Poverty as % of by Tract	Families by Family Income	
	#	%	#	%	#	%	#	%
Low	37	6.9	27,789	5.4	8,529	30.7	107,927	20.9
Moderate	128	23.9	111,119	21.5	19,961	18.0	93,129	18.0
Middle	209	39.1	211,668	41.0	15,048	7.1	104,516	20.2
Upper	158	29.5	165,139	31.9	6,890	4.2	211,319	40.9
Unknown	3	0.6	1,176	0.2	201	17.1	0	0.0
Total AA	535	100.0	516,891	100.0	50,629	9.8	516,891	100.0
				Hous	ing Type by	Tract		
	Housing Units by	Ov	wner-occupi	ed	Rer	ntal	Vacant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	62,577	10,786	2.4	17.2	42,756	68.3	9,035	14.4
Moderate	223,075	69,631	15.7	31.2	123,309	55.3	30,135	13.5
Middle	356,913	189,292	42.7	53.0	134,765	37.8	32,856	9.2
Upper	267,876	172,650	39.0	64.5	64,273	24.0	30,953	11.6
Unknown	2,024	888	0.2	43.9	676	33.4	460	22.7
Total AA	912,465	443,247	100.0	48.6	365,779	40.1	103,439	11.3
				Busin	esses by Tra	ct & Revenu	e Size	
	Total Busi Tra	nesses by act	Less Th \$1 M		Over \$1	Million	Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,286	4.6	3,988	4.6	270	5.1	28	4.0
Moderate	22,069	23.7	20,327	23.3	1,593	29.8	149	21.1
Middle	34,234	36.7	32,297	37.0	1,694	31.7	243	34.5
Upper	32,412	34.8	30,350	34.8	1,782	33.3	280	39.7
Unknown	231	0.2	221	0.3	5	0.1	5	0.7
Total AA	93,232	100.0	87,183	100.0	5,344	100.0	705	100.0
Percenta	age of Total I	Businesses:		93.5		5.7		0.8

				Far	rms by Tract & Revenue Size				
	Total Farms by Tract			nan or = Iillion	Over \$1	Million	Reven Repo	ue Not orted	
	#	%	#	%	#	%	#	%	
Low	11	2.8	11	2.8	0	0.0	0	0.0	
Moderate	70	17.5	68	17.3	2	33.3	0	0.0	
Middle	136	34.1	132	33.6	4	66.7	0	0.0	
Upper	182	45.6	182	46.3	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	399	100.0	393	100.0	6	100.0	0	0.0	
Per	centage of T	otal Farms:		98.5		1.5		0.0	

Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Economic Conditions

During the review period, the area economy transitioned from the recovery stage of the business cycle into mid-expansion. Tourism is a key economic driver of the area economy, as well as the leisure and hospitality industries which anchor the area as a retiree destination. Tourism remained the cornerstone sector during the review period, with visitation and gaming revenues surpassing prepandemic levels by 2021, supported by a mix of leisure and business travel, conventions, and sporting events. Major projects and additional hotel developments boosted capacity and job creation within the assessment area. The area's diverse attractions, including high-profile sporting events, significantly increased visitor spending and hotel occupancy rates during the review period.

Growth in the healthcare industry helped to diversify the tourism-driven economy. ¹⁵¹ Healthcare payrolls in the area expanded at a rate outpacing regional and national averages. ¹⁵² Above-average population growth, particularly among retirees, increased healthcare demand. ¹⁵³ Investments in healthcare facilities, including a \$5 billion medical campus and expansions at existing hospitals, created high-wage jobs and helped meet the area's increased healthcare needs. ¹⁵⁴ Construction payrolls also increased in 2023, in part due to major developments on the Las Vegas Strip, including a new concert venue, hotel and casino, restaurant, and shopping center. ¹⁵⁵

¹⁴⁷ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, July 2021.

¹⁴⁸ Ibid.

Moody's Precis Report, Las Vegas-Henderson-Paradise NV, November 2022.

¹⁵⁰ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, November 2023.

¹⁵¹ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, March 2022.

¹⁵² Ibid

¹⁵³ Ibid

¹⁵⁴ Ibid

¹⁵⁵ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, March 2023.

The housing market experienced volatility during the review period. High home prices and limited inventory pushed many potential homebuyers into the rental market. ¹⁵⁶ After a sharp correction in 2022, single-family home prices have resumed their upward trend, nearing previous highs. ¹⁵⁷ While migration slowed late in the review period, the metro area continued to attract residents with its low tax rates and affordable housing relative to other major metro areas, supporting housing demand. ¹⁵⁸

Census data shows that between 2015 and 2020, the area population was on the rise, with growth occurring at a pace of 11.3 percent. The population growth of Clark County was slightly higher than the state as a whole, which increased by 10.9 percent during the same timeframe. Exhibit 50 below shows population growth in the assessment area, as well as the state of Nevada, between 2015 and 2020.

EXHIBIT 50 POPULATION CHANGE ASSESSMENT AREA: NEVADA								
Area	2015 Population	2020 Population	Percent Change					
Clark County, NV	2,035,572	2,265,461	11.3%					
State of Nevada	2,798,636	3,104,614	10.9%					

Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census

Between 2015 and 2020, increases in median family incomes within the assessment area were lower than the growth of the state as a whole. The median family increase across the area was 9.7 percent, which was below the statewide figure of 11.3 percent. Exhibit 51 below reflects the change in median family income that occurred in Clark County and the statewide during that timeframe.

Ехнівіт 51								
MEDIAN FAMILY INCOME CHANGE								
	ASSESSMENT AREA: I	NEVADA						
	2015 Median Family 2020 Median Family							
Area	Income	Income	Percent Change					
Clark County, NV	\$65,547	\$71,896	9.7%					
State of Nevada	\$66,555	\$74,077	11.3%					

Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

Exhibit 52 on the following page reflects the unemployment rate of the assessment area and the state of Nevada. Unemployment rates in the area remained relatively aligned with the overall statewide figures. The area unemployment rate was steady from 2018 to 2019, before experiencing an increase in 2020 due to the pandemic. Unemployment rates consistently declined after 2020 but had not recovered to pre-pandemic levels as of 2022.

¹⁵⁶ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, July 2021.

Moody's Precis Report, Las Vegas-Henderson-Paradise NV, November 2022.

¹⁵⁸ Moody's Precis Report, Las Vegas-Henderson-Paradise NV, July 2024.

EXHIBIT 52 UNEMPLOYMENT RATES ASSESSMENT AREA: NEVADA								
Area	2018	2019	2020	2021	2022			
Clark County, NV	4.6%	4.3%	15.5%	7.9%	6.0%			
State of Nevada	4.4%	4.1%	13.5%	6.9%	5.4%			

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

The cost burden for renters and owners indicates a need for affordable housing in the area, as many low- and moderate-income renters and owners are spending 30 percent or more of their household income on housing. Affordable housing options for low-income populations in particular were scarce, and a majority of low- and moderate-income renters in the assessment area and the state are considered cost burdened. Exhibit 53 below reflects the percentages of cost burdened renters and owners within the assessment area and statewide.

EXHIBIT 53 HOUSING COST BURDEN ASSESSMENT AREA: NEVADA							
	Cost Burden - Renters			Cost Burden - Owners			
	Low	Low Moderate			Moderate	All	
Area	Income	Income	All Renters	Income	Income	Owners	
Clark County, NV	82.5%	64.4%	46.9%	66.1%	45.1%	23.8%	
State of Nevada	81.0%	59.0%	45.4%	62.8%	42.1%	22.8%	

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

The number of small business loans originated within the assessment area increased steadily between 2017 and 2021, generally keeping pace with statewide trends. Within Clark County, growth was greatest in 2021, with an increase of 22.2 percent from the year before. Overall, the number of small business loans in the assessment area in 2021 increased by 73.2 percent from 2017 levels. Statewide trends were similar, with 2021 small business loan volumes in the state as a whole increasing by 60.8 percent from 2017 levels, as shown in Exhibit 54 below. Lending to small businesses is critical for the support of the local economy given that small businesses represented 93.5 percent of all businesses in the assessment area, as reflected in Exhibit 49 above.

EXHIBIT 54 SMALL BUSINESS LOAN TRENDS ASSESSMENT AREA: NEVADA						
Area 2017 2018 2019 2020 2021						
Clark County, NV	40,669	43,785	49,647	57,597	70,410	
State of Nevada	56,662	60,504	67,544	76,943	91,099	

Source: Federal Financial Institutions Examination Council (FFIEC) Community Reinvestment Act Aggregate Data

Both the assessment area and the state of Nevada experienced significant mortgage loan growth in 2019 and 2020. However, volume growth slowed in 2021 and declined sharply in 2022, with Nevada experiencing a slightly steeper drop compared to Clark County. Within the assessment area, the largest growth occurred in 2020, with an increase of 52.7 percent from the year before; however, mortgage

loans in 2022 decreased by 55.2 percent from 2021 levels. During the same timeframe, mortgage loans in the state experienced similar fluctuations, with mortgage loans in 2022 decreasing by 56.5 percent from the year before. Exhibit 55 below reflects mortgage loans originated by financial institutions in the assessment area and the state of Nevada during the period of 2018 through 2022.

Ехнівіт 55					
Mortgage Trends					
ASSESSMENT AREA: NEVADA					
Area	2018	2019	2020	2021	2022
Clark County, NV	63,886	80,352	122,662	128,074	57,352
State of Nevada	87,139	110,725	171,542	177,328	77,204

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act Loan/Application Records

Credit and Community Development Needs

Several factors highlight the growing need for affordable housing development and financing in the Nevada assessment area. Rapid population growth has outpaced the construction of housing, driving up demand and prices. While the area's low tax rates and warm climate have historically contributed to above-average population growth, recent expansions in job creation – spurred by major developments on the Las Vegas Strip, the introduction of new high-profile sporting events, and the construction of a Major League Baseball stadium – have further exacerbated the need for affordable housing.

One community contact within the area indicated that although the local economy is anchored by a strong tourism and hospitality sector, many jobs in these industries are low-wage positions, making it difficult for workers to afford housing. Additionally, rising housing costs have been fueled by investors purchasing homes and reselling them at significantly higher prices, according to the contact. The contact noted that there are opportunities for local financial institutions to collaborate with affordable housing organizations, leveraging LIHTC programs to support low- and moderate-income housing developments in the area.

Another community contact identified a need for small business financing and technical expertise within the assessment area. Specifically, the contact emphasized the importance of helping existing local businesses create business plans to support expansion in response to population growth and inflation in the area. Additionally, the contact highlighted the need for start-up businesses to gain better access to capital and develop effective marketing strategies.

Conclusions with Respect to Performance Tests in Nevada

Lending Test

EWB's lending test performance in Nevada is high satisfactory. Lending levels are overall excellent despite the bank's limited presence in the assessment area. Geographic lending distributions are good, and borrower distributions are generally adequate. The overall lending test performance is driven by the lending distributions of small business and home mortgage loans and relatively high levels of community development loans.

Lending Activity

EWB's lending levels reflect excellent responsiveness to assessment area credit needs. Relatively high levels of community development and home mortgage loans were extended despite the bank's limited presence in the assessment area. Data on lending volumes are on Table 139.

Lending Distribution by Geography

The geographic distributions of loans in Nevada are good. Loans were extended within each census tract income category. There were no conspicuous lending gaps, and lending patterns are generally clustered near the bank's sole branch and followed the concentration of owner-occupied housing units and concentrations of small businesses.

Small Business Lending

The geographic distribution of small business loans is good. As seen on Tables 140 and 141, loans were generally extended in census tracts of all income levels. While performance was good during 2020 and 2021, the distribution of loans within moderate-income census tracts fell behind the aggregate and concentration of businesses in those areas during 2022 and 2023.

Home Mortgage Lending

The geographic distribution of home purchase loans is excellent overall. Performance was strong in both low- and moderate-income census tracts. Owner occupied housing units in low-income areas comprised less than two percent of total owner-occupied housing units and less than 17 percent in moderate-income areas early in the review period. Despite this fact, the bank extended high percentages of home mortgage lending in low- and moderate-income geographies, exceeding aggregate lenders. Excellent performance is partially due to the success of the bank's special mortgage product designed to assist low- and moderate-income borrowers. Data used for this analysis is on Tables 142 and 144.

The geographic distribution of home mortgage refinances is also excellent. As seen on Tables 142 and 144, and similar to home purchase loans, performance was strong for the duration of the review period, as lending levels in low- and moderate-income areas exceeded aggregate lending and the percentages of homes in those areas.

Lending Distribution by Business Revenue

Overall lending distributions by business revenue are adequate in Nevada. Due to high volumes of loans to businesses of unknown revenues in 2020 and 2021, this assessment is based on small business lending in 2022 and 2023. Lending performance and lending levels were generally comparable to demographic comparators as noted below.

Small Business Lending

The distribution of small business loans among businesses of different sizes is adequate overall. Lending levels to small businesses in 2022 were good, as they were above aggregate lender performance and compared favorably to the representation of small businesses. However, performance in 2023 was poor,

as small business lending levels fell far below that of the aggregate as well as the concentration of small businesses in the assessment area. Data used for this assessment can be seen on Tables 146 and 147.

Community Development Lending

EWB extended relatively high levels of community development loans that exhibited good responsiveness to community credit needs, despite the bank's limited presence in Nevada. As seen on Table 139, the bank made 23 community development loans totaling over \$94.3 million in the assessment area. These loans helped to address various community development needs. Notable community development loans in Nevada include the following:

- A \$22 million loan to refinance a retail shopping center located in a moderate-income neighborhood. The center housed 69 retail units, including large anchor tenants that employ and are patronized by low- and moderate-income individuals and households.
- A \$8 million loan for a 23-unit retail shopping plaza located in a low-income geography within
 the assessment area. The loan helped to stabilize and revitalize the area by securing long-term
 jobs for low- and moderate-income individuals and attracting and retaining residents to the
 area.
- A \$6.5 million loan to refinance a 216-unit apartment building located in a moderate-income geography. A majority of the units of the apartment complex benefit low- and moderate-income households based on affordable rent levels and local economic and demographic data.
- A \$5.4 million loan to refinance a 76-unit apartment complex located in a low-income census tract within the assessment area. Nearly all units (99 percent) qualify as affordable housing due to low rents.

Investment Test

EWB's community development investment performance within the Nevada assessment area is high satisfactory. Considering its limited presence in the area, the bank made a significant level of qualified investments and grants that were responsive to a variety of needs in the community. As seen on Table 152, the bank made a total of \$21.5 million in investments comprised of \$11.9 million in new investments, as well as \$9.6 million made during prior periods that remain on the bank's books. As with other assessment areas, Nevada benefited from investments in national funds that cover a broader statewide or regional area that includes the assessment area. These investments were responsive to the need for affordable housing for low- and moderate-income individuals and economic development. Examples of investments include the following:

- \$6.5 million in investments into CRA-eligible MBS where the underlying mortgages were made to low- or moderate-income borrowers or within low- or moderate-income geographies inside the assessment area.
- A \$3.7 million investment in a New Market Tax Credit fund that included tax credit equity financing for two community development projects in the assessment area. The investment provided working capital for a local food bank that collects food from major retail partners that would otherwise be wasted and delivers the food to those in need. The investment also

- financed improvements to a local homeless resources center that provides critical services to the unhoused.
- A \$1.2 million investment into a New Market Tax Credit fund that was primarily used to provide loans to various small businesses throughout Nevada, including the bank's assessment areas, promoting economic development.

Service Test

EWB's performance under the service test in Nevada is high satisfactory based on the availability of its delivery systems and the level of community development services provided by bank employees during the review period.

Retail Banking Services

EWB's banking services are reasonably accessible to the bank's geographies and to individuals of different income levels and do not vary in a way that inconveniences any portion of the area. A full array of personal and business banking products and services – including those previously discussed – is offered in Nevada. Services include extended hours on Friday and Saturday banking services. In addition, delivery systems including ATM, telephone banking, online, and mobile banking are offered to provide customers access to banking services after normal business hours.

EWB has one branch in this assessment area located in a low-income census tract. There have been no changes to the bank's branches in the assessment area during the review period. Given the bank's limited presence in this large geographic area, its sole branch in a low-income census tract provides reasonable access to surrounding low- and moderate-income areas and populations.

Community Development Services

Considering its limited presence in Nevada, EWB provided a relatively high level of community development services in the assessment area. The bank's employees provided a total of 178.5 hours of community development service during the review period. Services involved providing basic financial education or information about the lending process to low- and moderate-income individuals or students from low- and moderate-income families, as well as participation in the Volunteer Income Tax Assistance Program focused on low- and moderate-income households. The following are examples of the types of services provided in Nevada.

- An EWB employee provided 53 hours of community development services assisting low- and moderate-income individuals with free tax preparation. The employee partnered with a nonprofit organization to assist with these events as well as to support the organization's mission to provide underserved communities with social economic, workforce, and business services.
- An EWB employee provided 19 hours of service developing various financial literacy training videos to be distributed to Title I school students located in the assessment area. The videos covered a variety of topics relevant to their age and highlighted the importance of being financially literate.
- Three bank employees provided 16 community development service hours partnering with multiple organizations and participating in a financial literacy workshop for parents from local

low- and moderate-income communities who were benefitting from income-based programs that cater to low-income families. The workshop topics provided information on child education, improving credit scores, and creating bank accounts for children.

• Four EWB employees provided 12 community development service hours through organizing and hosting a mortgage training seminar focused on low- and moderate-income individuals located in the assessment area. The seminar provided comprehensive insights on navigating various loan programs.

APPENDIX A

SCOPE OF EXAMINATION

Please refer to page 4 of this report for a discussion of the examination scope. The following chart is a supplement to that discussion and serves to illustrate the scope of the various states and assessment areas.

SCOPE OF EXAMINATION				
January 1, 2020 – December 31, 2023 (Retail January 1, 2021 – August 12, 2024 (Commun Development)				
FINANCIAL INSTITUTION	PRODUCTS REVIEWED			
East West Bank Pasadena, California	 Home Mortgage (Purchase, Refinance, Home Improvement, Multifamily) Small Business 			

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION					
Assessment Area	Type of Examination	Branches Visited	Other Information		
California					
 Southern California 	Full	0			
Bay Area	Full	0			
 Sacramento 	Limited	0			
San Diego	Limited	0			
New York					
New York	Full	0			
Texas					
Houston	Full	0			
 Dallas 	Limited	0			
Washington					
 Washington 	Full	0			
Georgia					
Georgia	Full	0			
Massachusetts					
 Massachusetts 	Full	0			
Nevada					
 Nevada 	Full	0			

APPENDIX B

SUMMARY OF RATINGS

SUMMARY OF RATINGS						
STATE/TERRITORY	LENDING TEST RATING	INVESTMENT TEST SERVICE TES RATING RATING		OVERALL RATING		
California	Outstanding	Outstanding	High Satisfactory	Outstanding		
New York	Outstanding	Outstanding	High Satisfactory	Outstanding		
Texas	Outstanding	Outstanding	High Satisfactory	Outstanding		
Washington	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory		
Georgia	Outstanding	High Satisfactory	High Satisfactory	Outstanding		
Massachusetts	Outstanding	Outstanding	High Satisfactory	Outstanding		
Nevada	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory		

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APPENDIX C

GLOSSARY OF TERMS

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 metropolitan area/assessment area.

Census tract: 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 statistical 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: All Agencies have adopted the following language. 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.

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

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further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-scope review: Performance under the lending and community development tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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

Limited-scope review: Performance under the lending and community development tests is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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APPENDIX D

LIMITED-SCOPE ASSESSMENT AREA MARKET PROFILES

All demographic and economic information in this appendix originates from one of the following sources:

- U.S. Census Bureau, QuickFacts, Population Estimates, July 1, 2023; available from http://www.census.gov/quickfacts/.
- Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2024; available from: https://www7.fdic.gov/sod/sodMarketBank.asp?barItem=2.
- FFIEC Adjusted Median Family Income; available from: https://www.ffiec.gov/Medianincome.htm.

Dallas Assessment Area

The Dallas assessment area consists of Collin and Dallas counties in their entirety and is part of the Dallas-Plano-Irving MD and Dallas-Fort Worth-Arlington MSA. Collin and Dallas counties are located in northeast Texas, approximately 200 miles north of the state capital, Austin. As of June 2023, the combined area was home to an estimated 3.8 million people.

The bank had a limited presence in the market for financial services. There were 475 Federal Deposit Insurance Corporation (FDIC)-insured financial institutions operating 838 offices that held deposits totaling over \$306.9 billion in the area as of June 30, 2024. EWB operated three branches in the area and held \$204.4 million in total deposits, representing 0.07 percent of the deposit market share.

The following exhibit presents key demographic and business information concerning the assessment area.

			Exhibit !									
Assessment Area Demographics Assessment Area: Dallas												
Income Categories	Tract Dis	tribution	Families b Incon	y Tract	Families < I Level as Families b	% of	Families by Family Income					
	#	% #		%	# %		#	%				
Low	175	9.1	148,226	8.1	38,476	26.0	428,715	23.4				
Moderate	516	26.9	459,880	25.1	69,117	15.0	322,830	17.7				
Middle	584	30.5	581,939	31.8	45,774	7.9	349,779	19.1				
Upper	584	30.5	627,387	34.3	22,475	3.6	727,629	39.8				
Unknown	56	2.9	11,521	0.6	3,085	26.8	0	0.0				
Total AA	1,915	100.0	1,828,953	100.0	178,927	9.8	1,828,953	100.0				
			Housing Type by Tract									
	Housing Units by	Ow	ner-occupied		Renta	al	Vacant					
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit				
Low	282,888	74,908	4.7	26.5	177,962	62.9	30,018	10.6				
Moderate	782,433	342,879	21.5	43.8	369,094	47.2	70,460	9.0				
Middle	976,284	535,099	33.5	54.8	354,573	36.3	86,612	8.9				
Upper	975,058	635,600	39.8	65.2	254,597	26.1	84,861	8.7				
Unknown	38,507	7,286	0.5	18.9	25,801	67.0	5,420	14.1				
Total AA	3,055,170	1,595,772	100.0	52.2	1,182,027	38.7	277,371	9.1				

				Busin	esses by Tract	& Revenu	e Size					
		nesses by act	Less Tha \$1 Mil		Over \$1 N	Aillion	Revenue Repor					
	#	%	#	%	#	%	#	%				
Low	22,694	5.6	20,737	5.5	1,791	6.6	166	3.3				
Moderate	83,484 20.4		76,603	20.4	6,186	22.9	695	13.7				
Middle	125,499	30.7	115,631	30.7	8,575	31.7	1,293	25.6				
Upper	170,289	41.7	157,649	41.9	9,823	36.3	2,817	55.7				
Unknown	6,270 1.5		5,507	1.5	676	2.5	87	1.7				
Total AA	408,236	100.0	376,127	100.0	27,051	100.0	5,058	100.0				
Perce	entage of Tota	Businesses:		92.1		6.6		1.2				
			Farms by Tract & Revenue Size									
	Total Farm	ns by Tract	Less Tha \$1 Mil		Over \$1 N	Million	Revenue Repor					
	#	%	#	%	#	%	#	%				
Low	114	2.5	110	2.4	4	4.4	0	0.0				
Moderate	696	15.2	670	14.9	24	26.7	2	50.0				
Middle	1,603	34.9	1,573	35.0	29	32.2	1	25.0				
Upper	2,141	46.6	2,108	46.9	32	35.6	1	25.0				
Unknown	38	0.8	37	0.8	1	1.1	0	0.0				
Total AA	4,592	100.0	4,498	100.0	90	100.0	4	100.0				
i	Percentage of	Total Farms:		98.0		2.0		0.1				

Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Data regarding East West's deposits, loans, investments, and branches may be found in the Core Tables.

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Sacramento Assessment Area

The Sacramento assessment area consists of Sacramento County in its entirety and is part of the Sacramento-Roseville-Folsom, California Metropolitan Statistical Area. Sacramento is located in California's Central Valley which extends from the delta lands between the Sacramento and San Joaquin rivers to the foothills of the Sierra Nevada. The area was home to more than an estimated 1.6 million people in 2023.

The bank had a limited presence in the market for financial services. There were 31 Federal Deposit Insurance Corporation (FDIC)-insured financial institutions operating 178 offices that held deposits totaling over \$69.8 billion in the area as of June 30, 2024. East West operated one branch in the area and held \$200.8 million in total deposits, representing 0.29 percent of the deposit market share. Deposits in Sacramento County are primarily concentrated in five financial institutions that collectively hold 86.25 percent of the market share.

The following exhibit presents key demographic and business information concerning the assessment area.

			Exhib	oit 57									
	Assessment Area Demographics Assessment Area: Sacramento												
		Asse	essment Are	ea: Sacram	1	< Poverty							
Income Categories	Tract Dis	tribution		by Tract ome	Level a	as % of by Tract	Families by Family Income						
	#	%	# %		#	%	#	%					
Low	41	11.3	34,232	9.4	9,064	26.5	94,942	26.1					
Moderate	108	29.8	101,002	27.8	14,588	14.4	65,647	18.1					
Middle	123	33.9	132,246	36.4	9,337	7.1	69,555	19.2					
Upper	87	24.0	94,350	26.0	3,379	3.6	132,963	36.6					
Unknown	4	1.1	1,277	0.4	234	18.3	0	0.0					
Total AA	363	100.0	363,107	100.0	36,602	10.1	363,107	100.0					
				Hous	ing Type by Tract								
	Housing Units by	Oı	wner-occupi	ed	Rei	ntal	Vacant						
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit					
Low	59,122	16,671	5.3	28.2	38,983	65.9	3,468	5.9					
Moderate	165,391	75,117	23.9	45.4	81,569	49.3	8,705	5.3					
Middle	207,948	124,306	39.6	59.8	75,424	36.3	8,218	4.0					
Upper	137,660	97,434	31.0	70.8	35,434	25.7	4,792	3.5					
Unknown	2,795	706	0.2	25.3	1,875	67.1	214	7.7					
Total AA	572,916	314,234	100.0	54.8	233,285	40.7	25,397	4.4					

				Busin	esses by Tra	ct & Revenu	e Size					
		inesses by act		an or = lillion	Over \$1	Million	Reven Repo	ue Not orted				
	#	%	#	%	#	%	#	%				
Low	7,510	10.3	6,819	9.9	664	17.7	27	6.5				
Moderate	19,040	26.1	17,985	26.1	938	25.0	117	28.0				
Middle	25,490	34.9	24,334	35.3	1,041	27.7	115	27.5				
Upper	19,649	26.9	18,611	27.0	943	25.1	95	22.7				
Unknown	1,338 1.8		1,101	1.6	173	4.6	64	15.3				
Total AA	73,027	100.0	68,850	100.0	3,759	100.0	418	100.0				
Percenta		94.3		5.1		0.6						
			Farms by Tract & Revenue Size									
	Total Farm	ns by Tract		an or = lillion	Over \$1	Million	Revenue Not Reported					
	#	%	#	%	#	%	#	%				
Low	34	5.3	34	5.5	0	0.0	0	0.0				
Moderate	165	25.8	155	25.2	10	45.5	0	0.0				
Middle	240	37.6	230	37.3	9	40.9	1	100.0				
Upper	194	30.4	192	31.2	2	9.1	0	0.0				
Unknown	6	0.9	5	0.8	1	4.5	0	0.0				
Total AA	639	100.0	616	100.0	22	100.0	1	100.0				
Per	centage of To	otal Farms:		96.4		3.4		0.2				

Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Data regarding East West Bank's deposits, loans, investments, and branches may be found in the Core Tables.

San Diego Assessment Area

The San Diego assessment area consists of San Diego County and comprises the full San Diego-Chula Vista-Carlsbad, California MSA. San Diego County is located on the coast of southern California, south of Riverside and Orange counties and north of the U.S.-Mexico international border. The assessment area was home to more than 3.3 million people in 2019.

There were 44 FDIC-insured financial institutions operating 451 offices that held deposits totaling \$125.2 billion in the area as of June 30, 2024. East West operated one branch in the area and held \$223.2 million in total deposits, representing 0.18 percent of the deposit market share.

The following exhibit presents key demographic and business information concerning the assessment area.

			Exhib	it 58								
Assessment Area Demographics Assessment Area: San Diego												
		Ass				< Poverty	Familia d	5				
Income Categories	Tract Dist	tribution		by Tract ome		s % of by Tract	Families by Family Income					
	#	%	#	%	#	%	#	%				
Low	46	6.2	43,837	5.8	10,530	24.0	172,988	22.8				
Moderate	167	22.7	173,346	22.8	20,063	11.6	131,098	17.3				
Middle	262	35.5	260,157	34.3	15,032	5.8	142,293	18.7				
Upper	248	33.6	279,925	36.9	9,275	3.3	313,039	41.2				
Unknown	14	1.9	2,153	0.3	144	6.7	0	0.0				
Total AA	737	100.0	759,418	100.0	55,044	7.2	759,418	100.0				
	Hausina											
	Housing Units by	O	wner-occupi	ed	Rer	ntal	Vacant					
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit				
Low	69,718	14,897	2.4	21.4	51,057	73.2	3,764	5.4				
Moderate	279,122	96,116	15.8	34.4	164,465	58.9	18,541	6.6				
Middle	437,896	226,716	37.2	51.8	180,673	41.3	30,507	7.0				
Upper	423,636	270,251	44.4	63.8	121,644	28.7	31,741	7.5				
Unknown	5,156	1,370	0.2	26.6	3,514	68.2	272	5.3				
Total AA	1,215,528	609,350	100.0	50.1	521,353	42.9	84,825	7.0				

				Busin	esses by Tra	ct & Revenu	e Size					
	Total Busi Tra	•	Less Th \$1 M		Over \$1	. Million	Reven	ue Not orted				
	#	%	#	%	#	%	#	%				
Low	6,933	4.0	6,430	4.0	472	4.1	31	3.4				
Moderate	30,515	17.5	28,537	17.6	1,869	16.3	109	11.9				
Middle	60,606	34.7	56,389	34.7	3,915	34.2	302	32.9				
Upper	75,277	43.1	69,736	43.0	5,073	44.3	468	50.9				
Unknown	1,356 0.8		1,218	0.8	129	1.1	9	1.0				
Total AA	174,687	100.0	162,310	100.0	11,458	100.0	919	100.0				
Percentage of Total Businesses:				92.9		6.6		0.5				
			Farms by Tract & Revenue Size									
	Total Farm	ns by Tract	Less Th \$1 M		Over \$1	Million	Reven Repo					
	#	%	#	%	#	%	#	%				
Low	23	1.6	22	1.6	1	1.7	0	0.0				
Moderate	147	10.5	143	10.7	4	6.8	0	0.0				
Middle	598	42.9	578	43.3	19	32.2	1	100.0				
Upper	625	44.8	590	44.2	35	59.3	0	0.0				
Unknown	2	0.1	2	0.1	0	0.0	0	0.0				
Total AA	1,395	100.0	1,335	100.0	59	100.0	1	100.0				
Per	centage of To	otal Farms:		95.7		4.2		0.1				

Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Data regarding East West's deposits, loans, investments, and branches may be found in the Core Tables.

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Rated Area: State of California

Table 1 – Lending Volume of Reported Loans Retail Lending Evaluation Period: January 1, 2020 to December 31, 2023 Community Development Lending Evaluation Period: January 1, 2021 to August 12, 2024

Assessment Areas	% of Rated Area	Small Bu	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans		Total Reported Loans	
	Loans	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	Deposits
Full Scope												
Southern California	71.6	33,522	1,524,358	0	0	10,555	6,644,417	942	4,442,163	45,019	12,610,938	87.2
Bay Area	26.5	13,539	519,717	0	0	2,923	2,220,421	215	724,733	16,677	3,464,871	12.0
Statewide/Regional								182	825,500	182	825,500	
Limited Scope												
Sacramento	0.7	75	12,437	0	0	382	109,674	14	61,043	471	183,154	0.4
San Diego	1.2	153	24,737	0	0	546	340,525	29	117,528	728	482,790	0.4

	Table 2 - Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Southern California												
	Bank And Aggregate Loans By Year												
Geographic	2020 2021												Total
Income Level	Ва	Bank Agg Bank Agg Bank Agg Bank Agg										Businesses %	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	3,366	26.9	5.1	40,237	6.2	5.2	1,294	20.3	4.7	35,614	7.1	5.4	5.2
Moderate	5,376	43.0	20.0	176,663	27.1	21.0	2,397	37.5	20.4	118,264	23.5	21.4	20.6
Middle	1,922	15.4	26.0	209,095	32.0	28.2	1,293	20.2	26.2	167,727	33.3	27.7	26.4
Upper	1,691	13.5	47.0	204,118	31.3	42.6	1,287	20.2	46.9	163,759	32.6	42.8	46.2
Unknown	150	1.2	1.5	22,303	3.4	2.6	116	1.8	1.4	17,664	3.5	2.5	1.6
Tract-Unk	0	0.0	0.4	0	0.0	0.4	0	0.0	0.4	0	0.0	0.1	
Total	12,505	100.0	100.0	652,416	100.0	100.0	6,387	100.0	100.0	503,028	100.0	100.0	100.0

Rated Area: State of California

Table 3 - Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography

Assessment Area: Southern California

					Bank A	And Aggreg	ate Loans E	By Year					
Geographic			2	022					2	023			Total
Income Level	Ва	ınk	Agg	Ban	k	Agg	Ва	ınk	Agg	Ban	k	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	1,275	17.3	3.2	15,893	8.7	3.8	1,317	18.2	3.2	14,487	7.8	3.3	3.6
Moderate	4,447	60.3	20.2	57,687	31.4	21.5	4,198	57.9	19.9	52,999	28.6	20.7	20.3
Middle	1,233	16.7	29.5	61,710	33.6	29.4	1,254	17.3	29.7	58,569	31.6	29.6	29.0
Upper	340	4.6	44.7	44,770	24.4	42.1	406	5.6	45.1	57,340	30.9	43.3	44.9
Unknown	80	1.1	2.0	3,441	1.9	3.1	80	1.1	1.9	2,018	1.1	3.0	2.3
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
Total	7,375	100.0	100.0	183,501	100.0	100.0	7,255	100.0	100.0	185,413	100.0	100.0	100.0

		Table 4	- Distribu	ition of 2020	and 202	1 Home I	Mortgage L	ending B	y Income	Level of Geo	graphy				
				1	Assessme	ent Area:	Southern (California							
					Bank A	nd Aggreg	ate Loans B	y Year					Owner Occupied		
Geographic															
Income Level	Bar	nk	Agg	Banl	k	Agg	Bar	nk	Agg	Banl	(Agg			
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%			
						Home Pur	chase Loans								
Low	25	2.0	2.9	11,684	1.7	2.0	59	4.1	3.1	27,109	3.1	2.1	2.7		
Moderate	159	12.8	17.8	62,896	8.9	12.3	249	17.3	18.0	95,769	10.9	12.4	18.3		
Middle	271	21.8	30.2	118,246	16.8	23.6	283	19.6	29.6	124,980	14.2	23.0	29.2		
Upper	685	55.1	48.3	437,083	62.1	61.1	794	55.0	48.5	584,893	66.4	61.5	49.7		
Unknown	103	8.3	0.8	73,414	10.4	1.0	58	4.0	0.8	47,722	5.4	1.0	0.1		
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0			
Total	1,243	100.0	100.0	703,323	100.0	100.0	1,443	100.0	100.0	880,473	100.0	100.0	100.0		

						Refinan	ice Loans						
Low	33	3.5	2.0	11,910	2.8	1.6	146	12.6	2.4	49,622	10.1	1.8	2.7
Moderate	283	29.7	14.6	95,721	22.5	11.3	463	39.9	16.3	145,505	29.8	12.2	18.3
Middle	216	22.7	28.4	72,419	17.1	24.0	237	20.4	28.8	72,570	14.8	23.4	29.2
Upper	404	42.4	54.8	231,627	54.5	62.8	302	26.1	52.2	212,881	43.5	62.2	49.7
Unknown	16	1.7	0.3	13,064	3.1	0.3	11	0.9	0.3	8,426	1.7	0.4	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	952	100.0	100.0	424,741	100.0	100.0	1,159	100.0	100.0	489,004	100.0	100.0	100.0
					Но	me Impro	vement Loa	ns					
Low	4	3.4	1.4	1,517	2.7	1.3	2	1.1	1.3	726	0.7	1.2	2.7
Moderate	31	26.1	11.9	9,918	17.8	9.8	54	28.9	12.1	18,681	19.0	10.2	18.3
Middle	22	18.5	24.6	8,665	15.6	21.1	36	19.3	26.0	14,489	14.8	21.7	29.2
Upper	62	52.1	61.9	35,620	63.9	67.7	89	47.6	60.4	57,988	59.1	66.5	49.7
Unknown	0	0.0	0.2	0	0.0	0.1	6	3.2	0.3	6,187	6.3	0.4	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	119	100.0	100.0	55,720	100.0	100.0	187	100.0	100.0	98,071	100.0	100.0	100.0
						Multifam	nily Loans						Multi-family Units %
Low	31	21.8	15.8	35,031	16.9	11.5	30	21.3	15.1	32,396	11.7	12.4	12.4
Moderate	67	47.2	36.3	76,975	37.0	32.1	62	44.0	37.5	114,428	41.3	30.5	32.1
Middle	30	21.1	23.3	46,446	22.4	25.5	30	21.3	22.3	59,520	21.5	27.7	23.8
Upper	14	9.9	24.1	49,333	23.7	30.1	19	13.5	24.5	70,588	25.5	28.4	30.6
Unknown	0	0.0	0.5	0	0.0	0.8	0	0.0	0.6	0	0.0	1.0	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	142	100.0	100.0	207,785	100.0	100.0	141	100.0	100.0	276,932	100.0	100.0	100.0
					Tota	al Home IV	lortgage Loa	ans					Owner Occupied Units %
Low	98	3.7	2.2	62,593	4.3	2.1	244	7.8	2.6	111,399	6.1	2.5	2.7
Moderate	568	21.7	15.3	251,835	17.2	12.5	871	27.7	16.8	383,992	20.9	13.1	18.3
Middle	580	22.2	28.6	258,474	17.7	23.8	636	20.3	28.8	286,878	15.6	23.3	29.2
Upper	1,253	47.9	53.6	802,297	54.9	61.1	1,311	41.8	51.4	988,475	53.9	60.5	49.7

Unknown	119	4.5	0.4	86,478	5.9	0.5	77	2.5	0.4	63,275	3.5	0.6	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2,618	100.0	100.0	1,461,677	100.0	100.0	3,139	100.0	100.0	1,834,019	100.0	100.0	100.0

		Table 5 -	Distributi	on of 2020	and 2021	Home M	lortgage Le	nding By	Income L	evel of Geo	graphy		
				A	ssessme	nt Area: S	Southern Ca	lifornia					
					Bank A	nd Aggreg	ate Loans By	Year					
Geographic			20	20					20	21			Owner Occupied
Income Level	Ban	nk	Agg	Ban	k	Agg	Ban	ık	Agg	Ban	k	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pur	pose LOC						
Low	3	2.5	0.9	1,435	3.4	0.5	7	4.3	0.9	1,546	2.4	0.6	2.7
Moderate	23	19.3	8.6	4,485	10.8	5.3	34	20.9	8.7	7,217	11.3	5.7	18.3
Middle	33	27.7	20.8	10,286	24.7	13.4	39	23.9	22.3	10,608	16.7	15.7	29.2
Upper	60	50.4	69.4	25,468	61.1	80.4	82	50.3	67.8	43,936	69.0	77.6	49.7
Unknown	0	0.0	0.3	0	0.0	0.3	1	0.6	0.2	400	0.6	0.3	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	119	100.0	100.0	41,674	100.0	100.0	163	100.0	100.0	63,707	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exem	npt					
Low	2	4.7	1.7	1,016	3.6	0.7	0	0.0	1.9	0	0.0	0.7	2.7
Moderate	5	11.6	11.8	1,840	6.5	3.8	8	18.2	13.6	2,104	8.2	4.8	18.3
Middle	8	18.6	24.4	2,412	8.5	9.1	10	22.7	23.6	4,675	18.3	10.0	29.2
Upper	28	65.1	61.9	23,166	81.5	86.3	25	56.8	60.5	18,189	71.3	84.2	49.7
Unknown	0	0.0	0.2	0	0.0	0.1	1	2.3	0.4	540	2.1	0.3	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	43	100.0	100.0	28,434	100.0	100.0	44	100.0	100.0	25,508	100.0	100.0	100.0
					Pi	urpose No	t Applicable						
Low	0	0.0	5.0	0	0.0	3.5	0	0.0	5.4	0	0.0	4.1	2.7
Moderate	0	0.0	26.0	0	0.0	18.4	1	50.0	28.9	288	88.9	21.4	18.3
Middle	0	0.0	35.3	0	0.0	29.9	1	50.0	35.3	36	11.1	36.3	29.2

Rated Area: State of California

Upper	0	0.0	33.4	0	0.0	47.9	0	0.0	30.3	0	0.0	37.9	49.7
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	324	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table (6 - Distrib	ution of 2022 a	and 2023	Home Mo	ortgage Le	ending By	Income Le	evel of Geogra	phy		
				А	ssessmen	t Area: So	outhern C	alifornia					
					Bank A	nd Aggreg	ate Loans I	By Year					_
Geographic				2022						2023			Owner Occupied
Income Level	Ва	ınk	Agg	Bank		Agg	Ва	nk	Agg	Bank	C	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purch	ase Loans						
Low	16	1.2	2.3	6,484	0.7	1.5	27	1.9	2.3	13,930	1.4	1.5	1.6
Moderate	160	12.4	19.6	70,694	7.9	13.1	214	14.8	20.1	101,676	10.1	13.3	18.4
Middle	420	32.5	33.0	212,154	23.7	26.4	457	31.6	32.8	240,454	23.9	25.9	32.8
Upper	692	53.6	44.2	600,845	67.2	58.2	742	51.3	44.0	647,419	64.3	58.5	46.9
Unknown	3	0.2	0.8	3,507	0.4	0.8	6	0.4	0.8	2,665	0.3	0.8	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1,291	100.0	100.0	893,684	100.0	100.0	1,446	100.0	100.0	1,006,144	100.0	100.0	100.0
						Refinance	Loans						
Low	17	2.0	2.0	3,785	0.7	1.4	9	2.4	2.2	3,461	1.4	1.1	1.6
Moderate	195	22.8	19.3	63,141	11.7	13.1	99	26.8	18.9	40,486	16.0	14.9	18.4
Middle	273	31.9	32.9	106,894	19.9	24.9	92	24.9	30.2	46,252	18.3	20.2	32.8
Upper	371	43.3	45.3	363,559	67.7	60.1	166	44.9	48.1	161,003	63.8	63.4	46.9
Unknown	0	0.0	0.5	0	0.0	0.5	4	1.1	0.6	1,272	0.5	0.4	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	856	100.0	100.0	537,379	100.0	100.0	370	100.0	100.0	252,474	100.0	100.0	100.0

					Hom	ne Improve	ment Loan	ıs					
Low	0	0.0	0.9	0	0.0	0.8	2	1.8	0.9	285	0.5	0.9	1.6
Moderate	20	11.2	11.8	5,821	6.8	8.6	18	16.5	14.4	5,631	10.7	10.8	18.4
Middle	58	32.6	30.7	17,250	20.0	23.9	28	25.7	31.7	9,116	17.4	24.4	32.8
Upper	100	56.2	56.1	62,969	73.2	66.3	61	56.0	52.6	37,396	71.3	63.4	46.9
Unknown	0	0.0	0.4	0	0.0	0.5	0	0.0	0.4	0	0.0	0.4	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	178	100.0	100.0	86,040	100.0	100.0	109	100.0	100.0	52,428	100.0	100.0	100.0
						Multifam	ily Loans						Multi-family Units %
Low	15	13.3	11.2	19,826	8.7	7.8	3	6.5	11.9	4,400	3.6	9.4	8.8
Moderate	49	43.4	38.2	73,025	31.9	29.6	21	45.7	37.3	50,427	41.6	25.3	31.2
Middle	35	31.0	25.0	71,113	31.1	28.7	16	34.8	24.9	55,201	45.5	34.1	27.8
Upper	14	12.4	23.5	64,680	28.3	31.7	5	10.9	23.8	8,850	7.3	28.6	29.3
Unknown	0	0.0	2.1	0	0.0	2.2	1	2.2	2.2	2,400	2.0	2.6	2.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	113	100.0	100.0	228,644	100.0	100.0	46	100.0	100.0	121,278	100.0	100.0	100.0
					Tota	al Home M	ortgage Lo	ans					Owner Occupied Units %
Low	51	1.9	2.1	30,994	1.7	2.2	47	2.2	2.2	23,377	1.5	1.9	1.6
Moderate	461	17.3	18.7	222,150	12.1	14.7	380	17.9	18.8	204,653	13.6	14.4	18.4
Middle	862	32.3	32.3	428,081	23.3	25.6	635	29.8	31.5	365,855	24.2	23.9	32.8
Upper	1,292	48.4	46.2	1,154,354	62.8	56.7	1,053	49.5	46.8	908,579	60.2	59.0	46.9
Unknown	4	0.1	0.7	3,828	0.2	0.9	13	0.6	0.7	6,850	0.5	0.8	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2,670	100.0	100.0	1,839,407	100.0	100.0	2,128	100.0	100.0	1,509,314	100.0	100.0	100.0

Rated Area: State of California

Table 7 - Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography

Assessment Area: Southern California

					Bank A	nd Aggreg	ate Loans By	Year					
Geographic			20	22		00 0			20	23			Owner Occupied
Income Level	Bar	nk	Agg	Ban	ık	Agg	Bar	ık	Agg	Bar	ık	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pur	pose LOC						
Low	1	0.6	0.8	5	0.0	0.5	4	3.8	1.0	839	1.9	0.6	1.6
Moderate	24	14.7	10.5	3,083	5.0	6.3	13	12.5	13.0	2,046	4.6	6.9	18.4
Middle	54	33.1	28.6	12,859	20.7	20.3	25	24.0	29.9	6,702	15.1	18.7	32.8
Upper	84	51.5	59.8	46,215	74.3	72.6	60	57.7	55.7	34,262	77.2	73.5	46.9
Unknown	0	0.0	0.3	0	0.0	0.3	2	1.9	0.4	513	1.2	0.4	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	163	100.0	100.0	62,162	100.0	100.0	104	100.0	100.0	44,362	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exem	npt					
Low	2	2.9	1.1	894	2.8	0.5	2	3.8	1.5	462	1.4	0.5	1.6
Moderate	13	18.8	14.1	6,386	20.3	4.6	15	28.3	15.0	4,387	13.4	5.1	18.4
Middle	22	31.9	27.3	7,811	24.8	10.4	17	32.1	30.3	8,130	24.9	12.1	32.8
Upper	31	44.9	56.9	16,086	51.1	83.6	19	35.8	52.6	19,649	60.2	81.4	46.9
Unknown	1	1.4	0.7	321	1.0	0.9	0	0.0	0.6	0	0.0	0.8	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	69	100.0	100.0	31,498	100.0	100.0	53	100.0	100.0	32,628	100.0	100.0	100.0
					Pı	urpose No	t Applicable						
Low	0	0.0	3.4	0	0.0	2.3	0	0.0	3.8	0	0.0	1.9	1.6
Moderate	0	0.0	32.2	0	0.0	38.6	0	0.0	21.4	0	0.0	10.2	18.4
Middle	0	0.0	37.7	0	0.0	31.0	0	0.0	23.0	0	0.0	11.8	32.8
Upper	0	0.0	26.1	0	0.0	27.7	0	0.0	51.0	0	0.0	75.0	46.9
Unknown	0	0.0	0.5	0	0.0	0.4	0	0.0	0.8	0	0.0	1.1	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

Rated Area: State of California

Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 8 -	Distributi	on of 2020 a	and 2021	Small Bus	iness Len	ding By R	evenue Si	ze of Busine	sses		
				As	sessment	Area: So	uthern Ca	lifornia					
					Bank A	nd Aggreg	ate Loans E	By Year					
			2	020					2	2021			Total
	Ва	nk	Agg	Ban	k	Agg	Ва	nk	Agg	Ban	k	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	8,320	66.5	41.3	64,236	9.8	23.8	3,547	55.5	45.2	77,031	15.3	23.5	91.8
Over \$1 Million	177	1.4		85,995	13.2		461	7.2		177,926	35.4		7.6
Revenue Unknown	4,008	32.1		502,185	77.0		2,379	37.2		248,071	49.3		0.5
Total	12,505	100.0		652,416	100.0		6,387	100.0		503,028	100.0		100.0
		I.				By Loan	Size				•		
\$100,000 or Less	10,972	87.7	90.0	134,441	20.6	37.8	5,287	82.8	93.8	83,789	16.7	41.2	
\$100,001 - \$250,000	763	6.1	5.9	122,690	18.8	19.5	499	7.8	3.6	80,015	15.9	17.3	
\$250,001 - \$1 Million	770	6.2	4.0	395,285	60.6	42.7	601	9.4	2.6	339,224	67.4	41.5	
Total	12,505	100.0	100.0	652,416	100.0	100.0	6,387	100.0	100.0	503,028	100.0	100.0	
				By L	oan Size ar	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	8,256	99.2		32,077	49.9		3,443	97.1		16,403	21.3		
\$100,001 - \$250,000	8	0.1		1,557	2.4		8	0.2		1,465	1.9		
\$250,001 - \$1 Million	56	0.7		30,602	47.6		96	2.7		59,163	76.8		
Total	8,320	100.0		64,236	100.0		3,547	100.0		77,031	100.0		

		Table 9 -	Distributi	ion of 2022	and 2023	Small Bus	siness Len	ding By Re	evenue Siz	ze of Busine	sses		
				As	sessment	Area: So	uthern Ca	lifornia					
					Bank A	nd Aggreg	ate Loans E	By Year					
			2	.022					2	023			Total
	Ва	ınk	Agg	Ban	ık	Agg	Ва	nk	Agg	Bar	nk	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	7,104	96.3	51.8	76,985	42.0	32.2	6,915	95.3	53.7	68,116	36.7	32.9	92.1
Over \$1 Million	174	2.4		72,277	39.4		217	3.0		79,773	43.0		7.3
Revenue Unknown	97	1.3		34,239	18.7		123	1.7		37,524	20.2		0.6
Total	7,375	100.0		183,501	100.0		7,255	100.0		185,413	100.0		100.0
						By Loan	Size						
\$100,000 or Less	7,127	96.6	96.1	32,919	17.9	50.8	7,016	96.7	96.4	38,116	20.6	53.7	
\$100,001 - \$250,000	37	0.5	2.3	7,508	4.1	14.2	29	0.4	2.1	5,485	3.0	14.0	
\$250,001 - \$1 Million	211	2.9	1.6	143,074	78.0	35.0	210	2.9	1.4	141,812	76.5	32.4	
Total	7,375	100.0	100.0	183,501	100.0	100.0	7,255	100.0	100.0	185,413	100.0	100.0	
	-	•	•	By L	oan Size a	nd Revenu	es \$1 Millio	n or Less			•		
\$100,000 or Less	7,031	99.0		29,974	38.9		6,856	99.1		33,760	49.6		
\$100,001 - \$250,000	9	0.1		1,972	2.6		5	0.1		1,045	1.5		
\$250,001 - \$1 Million	64	0.9		45,039	58.5		54	0.8		33,311	48.9		
Total	7,104	100.0		76,985	100.0		6,915	100.0		68,116	100.0		

		Tabl	le 10 - Dist	tribution of 202	20 and 202 ssessmen				y Borrowe	er Income Leve	el		
					Bank A	nd Aggreg	ate Loans B	y Year					Families by
Borrower	_		2020	ı		I -	_		1	2021		г -	Family
Income Level		ınk	Agg	Bank	1	Agg	_	nk	Agg	Bank	1	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	1	ı	1	Г	1	me Purcha	1	ı	T		ı	T	П
Low	2	0.2	1.7	506	0.1	0.9	30	2.1	2.0	9,096	1.0	1.2	24.4
Moderate	18	1.4	7.1	5,825	0.8	3.3	60	4.2	5.3	19,753	2.2	2.4	16.4
Middle	18	1.4	17.9	6,011	0.9	11.7	29	2.0	15.7	13,312	1.5	9.9	17.3
Upper	25	2.0	60.3	11,484	1.6	71.0	46	3.2	58.8	24,855	2.8	69.0	41.9
Unknown	1,180	94.9	13.0	679,497	96.6	13.0	1,278	88.6	18.2	813,457	92.4	17.5	0.0
Total	1,243	100.0	100.0	703,323	100.0	100.0	1,443	100.0	100.0	880,473	100.0	100.0	100.0
	•	•	•		•	Refinance	Loans	•			•		1
Low	19	2.0	3.0	4,285	1.0	2.0	153	13.2	3.5	29,958	6.1	2.2	24.4
Moderate	132	13.9	8.2	35,830	8.4	5.0	400	34.5	9.5	112,965	23.1	5.6	16.4
Middle	104	10.9	18.2	35,270	8.3	14.3	139	12.0	18.3	48,498	9.9	13.7	17.3
Upper	138	14.5	54.5	56,174	13.2	62.1	98	8.5	51.3	49,474	10.1	61.0	41.9
Unknown	559	58.7	16.2	293,182	69.0	16.6	369	31.8	17.4	248,109	50.7	17.4	0.0
Total	952	100.0	100.0	424,741	100.0	100.0	1,159	100.0	100.0	489,004	100.0	100.0	100.0
	•		•	1	Hom	e Improve	ment Loans	s	I.			I.	
Low	0	0.0	2.8	0	0.0	2.0	3	1.6	4.3	350	0.4	3.6	24.4
Moderate	3	2.5	7.1	185	0.3	5.1	4	2.1	6.4	466	0.5	4.5	16.4
Middle	3	2.5	15.8	1,016	1.8	13.5	0	0.0	14.6	0	0.0	11.1	17.3
Upper	1	0.8	67.9	200	0.4	68.3	1	0.5	68.4	53	0.1	69.4	41.9
Unknown	112	94.1	6.4	54,319	97.5	11.1	179	95.7	6.3	97,202	99.1	11.3	0.0
Total	119	100.0	100.0	55,720	100.0	100.0	187	100.0	100.0	98,071	100.0	100.0	100.0
	1	1	1	<u> </u>	Total	Home Moi	rtgage Loar	ıs	1		1	1	II .
Low	21	0.8	2.7	4,791	0.4	1.7	192	6.4	3.2	40,394	2.6	1.9	24.4
Moderate	165	6.7	7.9	42,123	3.4	4.6	479	16.0	8.4	134,858	8.7	4.6	16.4

Middle	128	5.2	17.8	42,695	3.4	13.5	174	5.8	17.4	62,516	4.0	12.4	17.3
Upper	171	6.9	55.6	68,879	5.5	64.0	168	5.6	53.5	76,074	4.9	63.5	41.9
Unknown	1,991	80.4	16.0	1,095,404	87.4	16.3	1,985	66.2	17.5	1,243,245	79.8	17.6	0.0
Total	2,476	100.0	100.0	1,253,892	100.0	100.0	2,998	100.0	100.0	1,557,087	100.0	100.0	100.0

		Table 11	L - Distrib	ution of 202	20 and 20	21 Home	Mortgage	Lending I	By Borrov	ver Income	Level		
				A	ssessme	nt Area: S	Southern Ca	alifornia					
					Bank A	nd Aggreg	ate Loans By	Year					
Borrower Income			2020						20	21			Families by Family
Level	Ban	ık	Agg	Ban	k	Agg	Ban	nk	Agg	Ban	ık	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pur	pose LOC						
Low	0	0.0	3.7	0	0.0	2.6	3	1.8	3.9	666	1.0	4.6	24.4
Moderate	11	9.2	5.4	55	0.1	2.9	12	7.4	4.2	901	1.4	2.3	16.4
Middle	1	0.8	12.4	50	0.1	6.6	5	3.1	11.6	420	0.7	6.1	17.3
Upper	6	5.0	73.6	665	1.6	78.0	21	12.9	73.4	1,368	2.1	76.7	41.9
Unknown	101	84.9	4.9	40,904	98.2	9.9	122	74.8	6.9	60,352	94.7	10.3	0.0
Total	119	100.0	100.0	41,674	100.0	100.0	163	100.0	100.0	63,707	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exem	npt					
Low	0	0.0	3.9	0	0.0	1.7	3	6.8	5.9	324	1.3	2.6	24.4
Moderate	1	2.3	8.2	228	0.8	2.6	3	6.8	8.3	773	3.0	2.5	16.4
Middle	2	4.7	14.1	348	1.2	4.9	1	2.3	13.1	286	1.1	5.9	17.3
Upper	1	2.3	63.2	356	1.3	69.8	0	0.0	60.3	0	0.0	67.2	41.9
Unknown	39	90.7	10.6	27,502	96.7	21.1	37	84.1	12.4	24,125	94.6	21.8	0.0
Total	43	100.0	100.0	28,434	100.0	100.0	44	100.0	100.0	25,508	100.0	100.0	100.0
					Pı	urpose No	t Applicable						
Low	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	2	0.6	0.0	24.4
Moderate	0	0.0	0.5	0	0.0	0.3	0	0.0	0.4	0	0.0	0.1	16.4
Middle	0	0.0	0.6	0	0.0	0.5	0	0.0	0.3	0	0.0	0.1	17.3

Rated Area: State of California

Upper	0	0.0	1.7	0	0.0	2.9	2	100.0	0.6	0	0.0	0.3	41.9
Unknown	0	0.0	97.2	0	0.0	96.2	0	0.0	98.6	0	0.0	99.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	324	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Tabl	e 12 - Dist	ribution of 20	22 and 20	23 Home	Mortgage	Lending E	y Borrow	er Income Leve	el		
					Assessmer	nt Area: So	outhern Ca	alifornia					
					Bank A	And Aggreg	ate Loans I	By Year					
Borrower			2022							2023			Families by
Income Level	Ва	nk	Agg	Bank	C	Agg	Ва	nk	Agg	Bank		Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purch	ase Loans						
Low	15	1.2	1.6	4,645	0.5	1.1	3	0.2	1.7	620	0.1	1.1	23.7
Moderate	27	2.1	4.6	10,174	1.1	1.9	57	3.9	3.7	20,483	2.0	1.4	16.7
Middle	35	2.7	14.3	17,690	2.0	8.5	77	5.3	12.5	37,869	3.8	6.8	18.2
Upper	35	2.7	59.4	26,654	3.0	68.6	87	6.0	53.3	58,689	5.8	57.8	41.4
Unknown	1,179	91.3	20.1	834,521	93.4	20.0	1,222	84.5	28.9	888,483	88.3	32.9	0.0
Total	1,291	100.0	100.0	893,684	100.0	100.0	1,446	100.0	100.0	1,006,144	100.0	100.0	100.0
						Refinance	Loans						
Low	119	13.9	7.8	22,247	4.1	5.3	10	2.7	5.8	2,116	0.8	1.6	23.7
Moderate	161	18.8	12.5	42,993	8.0	6.9	57	15.4	8.6	14,417	5.7	1.7	16.7
Middle	15	1.8	19.3	5,777	1.1	13.4	18	4.9	14.9	6,084	2.4	3.6	18.2
Upper	28	3.3	44.7	31,116	5.8	55.8	16	4.3	38.5	8,807	3.5	17.0	41.4
Unknown	533	62.3	15.7	435,246	81.0	18.6	269	72.7	32.2	221,050	87.6	76.1	0.0
Total	856	100.0	100.0	537,379	100.0	100.0	370	100.0	100.0	252,474	100.0	100.0	100.0
					Hon	ne Improve	ement Loan	s					
Low	5	2.8	2.5	633	0.7	2.6	5	4.6	3.3	690	1.3	2.2	23.7
Moderate	3	1.7	6.9	746	0.9	3.9	3	2.8	9.2	870	1.7	5.0	16.7

Middle	0	0.0	17.3	0	0.0	11.2	0	0.0	18.9	0	0.0	11.6	18.2
Upper	1	0.6	67.5	340	0.4	73.5	1	0.9	58.4	160	0.3	62.3	41.4
Unknown	169	94.9	5.8	84,321	98.0	8.8	100	91.7	10.2	50,708	96.7	18.8	0.0
Total	178	100.0	100.0	86,040	100.0	100.0	109	100.0	100.0	52,428	100.0	100.0	100.0
					Tota	l Home Mo	rtgage Loa	ns					
Low	154	6.0	4.5	29,890	1.9	2.9	27	1.3	3.0	4,356	0.3	1.3	23.7
Moderate	211	8.3	8.2	56,326	3.5	4.0	132	6.3	5.8	39,042	2.8	1.7	16.7
Middle	61	2.4	16.7	23,522	1.5	10.3	104	5.0	13.9	45,288	3.3	5.6	18.2
Upper	70	2.7	53.9	59,135	3.7	63.6	110	5.3	49.0	68,641	4.9	41.7	41.4
Unknown	2,061	80.6	16.7	1,441,890	89.5	19.3	1,709	82.1	28.3	1,230,709	88.7	49.8	0.0
Total	2,557	100.0	100.0	1,610,763	100.0	100.0	2,082	100.0	100.0	1,388,036	100.0	100.0	100.0

		Table 13	3 - Distrib	ution of 202	22 and 20	23 Home	Mortgage	Lending I	By Borrov	ver Income	Level			
				A	Assessme	nt Area: S	Southern Ca	lifornia						
					Bank A	nd Aggreg	ate Loans By	Year						
Borrower Income			2022						20	23			Families by Family	
Level	Bar	ık	Agg	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Income %	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
	Other Purpose LOC													
Low	4	2.5	3.2	760	1.2	4.2	2	1.9	3.4	20	0.0	3.0	23.7	
Moderate	12	7.4	5.3	305	0.5	2.7	3	2.9	6.9	166	0.4	2.8	16.7	
Middle	11	6.7	15.0	55	0.1	7.8	5	4.8	16.3	25	0.1	8.0	18.2	
Upper	6	3.7	66.9	1,025	1.6	73.9	4	3.8	54.7	20	0.0	56.6	41.4	
Unknown	130	79.8	9.6	60,017	96.5	11.5	90	86.5	18.7	44,131	99.5	29.6	0.0	
Total	163	100.0	100.0	62,162	100.0	100.0	104	100.0	100.0	44,362	100.0	100.0	100.0	
					Othe	r Purpose	Closed/Exem	pt						
Low	11	15.9	5.2	1,605	5.1	2.3	7	13.2	4.3	910	2.8	1.0	23.7	
Moderate	8	11.6	8.2	2,108	6.7	2.4	12	22.6	10.0	3,106	9.5	2.4	16.7	
Middle	0	0.0	13.8	0	0.0	3.7	4	7.5	17.7	1,310	4.0	4.0	18.2	

Rated Area: State of California

							1						1		
Upper	0	0.0	58.5	0	0.0	67.2	2	3.8	47.7	965	3.0	42.4	41.4		
Unknown	50	72.5	14.3	27,785	88.2	24.4	28	52.8	20.4	26,337	80.7	50.1	0.0		
Total	69	100.0	100.0	31,498	100.0	100.0	53	100.0	100.0	32,628	100.0	100.0	100.0		
	Purpose Not Applicable														
Low	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.7		
Moderate	0	0.0	0.4	0	0.0	0.2	0	0.0	0.1	0	0.0	0.0	16.7		
Middle	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	18.2		
Upper	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	41.4		
Unknown	0	0.0	99.2	0	0.0	99.7	0	0.0	99.7	0	0.0	99.9	0.0		
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0		

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

		Table 1	.4 - Distrib	ution of 202	20 and 202	21 Small B	usiness Le	ending By	Income Le	evel of Geog	raphy		
					Asse	ssment A	rea: Bay A	rea					
					Bank A	And Aggreg	ate Loans E	By Year					
Geographic			2	.020					2	021			Total
Income Level													Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	1,905	39.9	10.9	40,679	19.3	12.0	913	32.0	10.3	31,084	18.1	11.8	10.7
Moderate	1,480	31.0	18.2	40,039	19.0	17.5	786	27.6	18.5	33,934	19.7	17.7	17.5
Middle	852	17.9	31.9	61,708	29.3	30.4	674	23.6	32.5	55,780	32.5	30.6	30.9
Upper	523	11.0	38.0	67,273	31.9	39.0	463	16.2	37.7	48,756	28.4	39.2	40.2
Unknown	10	0.2	0.6	1,019	0.5	0.7	14	0.5	0.5	2,295	1.3	0.7	0.7
Tract-Unk	0	0.0	0.5	0	0.0	0.4	0	0.0	0.6	0	0.0	0.1	
Total	4,770	100.0	100.0	210,718	100.0	100.0	2,850	100.0	100.0	171,849	100.0	100.0	100.0

Table 15 - Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography	
Assessment Area: Bay Area	

					Bank A	nd Aggreg	ate Loans E	By Year					
Geographic			2	022					2	023			Total
Income Level	Ва	nk	Agg	Ban	k	Agg	Ва	nk	Agg	Ban	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	1,206	38.1	6.0	10,299	18.7	6.1	1,012	36.7	5.4	14,196	17.3	5.6	5.8
Moderate	1,251	39.5	18.0	13,827	25.2	16.7	1,045	37.9	17.6	16,419	20.0	16.7	16.8
Middle	552	17.4	35.1	21,087	38.4	33.6	515	18.7	35.5	29,278	35.6	33.9	33.5
Upper	143	4.5	37.1	8,989	16.4	38.3	167	6.1	38.1	19,412	23.6	38.5	39.5
Unknown	13	0.4	3.4	730	1.3	5.3	15	0.5	3.1	2,913	3.5	5.2	4.5
Tract-Unk	0	0.0	0.4	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
Total	3,165	100.0	100.0	54,932	100.0	100.0	2,754	100.0	100.0	82,218	100.0	100.0	100.0

		Table 1	6 - Distribu	ution of 2020	and 2021	Home Mo	ortgage Le	nding By	Income Le	evel of Geogr	aphy				
	Assessment Area: Bay Area														
					Bank A	nd Aggreg	ate Loans B	y Year							
Geographic			2	2020					2	2021			Owner		
Income Level	Ва	nk	Agg	Banl	k	Agg	Ва	nk	Agg	Ban	k	Agg	Occupied Units %		
	# #% #% \$(000) \$% \$% # #% \$(000) \$% \$%														
	Home Purchase Loans														
Low	31														
Moderate	48	24.1	16.5	22,630	16.6	12.0	78	26.4	17.6	39,818	17.8	12.5	15.7		
Middle	57	28.6	36.3	40,850	30.0	32.0	102	34.6	35.9	68,880	30.9	31.5	35.7		
Upper	58	29.1	41.2	58,130	42.7	52.1	87	29.5	40.3	100,142	44.9	52.1	43.8		
Unknown	5	2.5	0.4	3,057	2.2	0.3	1	0.3	0.5	250	0.1	0.4	0.1		
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0			
Total	199	100.0	100.0	136,152	100.0	100.0	295	100.0	100.0	223,179	100.0	100.0	100.0		

						Refinance	Loans						
Low	24	7.8	4.0	9,325	4.6	3.2	41	11.7	4.3	17,446	7.7	3.2	4.6
Moderate	71	23.1	15.5	36,515	18.2	12.7	113	32.2	15.3	54,544	24.1	11.7	15.7
Middle	117	38.1	37.6	64,901	32.3	34.4	106	30.2	35.5	57,194	25.2	31.6	35.7
Upper	95	30.9	42.7	89,928	44.8	49.6	91	25.9	44.7	97,333	43.0	53.4	43.8
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	307	100.0	100.0	200,669	100.0	100.0	351	100.0	100.0	226,517	100.0	100.0	100.0
					Hom	e Improve	ment Loan	s					
Low	5	9.4	3.4	2,154	6.8	2.7	6	7.1	3.4	2,300	5.4	2.6	4.6
Moderate	15	28.3	13.2	5,586	17.5	11.0	26	31.0	11.5	9,796	23.1	8.7	15.7
Middle	14	26.4	34.8	7,187	22.5	30.9	30	35.7	36.8	13,105	30.9	32.5	35.7
Upper	18	34.0	48.5	16,660	52.2	55.3	22	26.2	48.3	17,179	40.5	56.0	43.8
Unknown	1	1.9	0.1	300	0.9	0.1	0	0.0	0.0	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	53	100.0	100.0	31,887	100.0	100.0	84	100.0	100.0	42,380	100.0	100.0	100.0
						Multifam	ily Loans						Multi-family Units %
Low	5	17.9	17.4	10,135	17.4	15.9	8	25.8	16.8	5,638	15.2	12.0	17.7
Moderate	11	39.3	25.7	19,917	34.2	17.1	2	6.5	26.5	1,862	5.0	32.3	23.4
Middle	8	28.6	31.5	8,330	14.3	29.4	15	48.4	29.9	18,915	50.8	26.6	30.8
Upper	3	10.7	24.4	12,030	20.7	36.9	6	19.4	25.7	10,795	29.0	28.4	26.6
Unknown	1	3.6	1.0	7,808	13.4	0.7	0	0.0	1.1	0	0.0	0.7	1.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	28	100.0	100.0	58,220	100.0	100.0	31	100.0	100.0	37,210	100.0	100.0	100.0
					Tota	al Home M	ortgage Lo	ans					Owner Occupied Units %
Low	69	10.3	4.2	34,454	7.3	3.7	87	9.6	4.6	41,523	6.7	3.4	4.6
Moderate	167	25.0	15.6	93,658	19.8	12.6	260	28.7	15.6	124,495	20.1	12.3	15.7
Middle	227	34.0	37.2	136,286	28.8	33.4	307	33.8	35.5	188,501	30.4	31.2	35.7
Upper	197	29.5	42.8	197,561	41.8	50.1	251	27.7	44.0	264,624	42.7	52.8	43.8
Unknown	7	1.0	0.2	11,165	2.4	0.2	2	0.2	0.2	660	0.1	0.2	0.1

Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	667	100.0	100.0	473,124	100.0	100.0	907	100.0	100.0	619,803	100.0	100.0	100.0

		Table 17 -	Distribut	tion of 2020	and 202	1 Home l	Mortgage Le	ending By	Income	Level of Ge	ography		
					Asse	ssment A	Area: Bay Ar	ea					
					Bank A	nd Aggreg	ate Loans By	Year					
Geographic			20	20					20	21			Owner Occupied
Income Level	Bar	nk	Agg	Ban	k	Agg	Ban	k	Agg	Ban	ık	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	rpose LOC						
Low	3	4.9	2.9	1,085	3.0	1.9	5	3.9	2.5	2,050	2.6	1.6	4.6
Moderate	17	27.9	11.5	7,017	19.1	8.1	33	26.0	11.4	15,705	19.9	7.9	15.7
Middle	24	39.3	32.2	11,764	32.0	25.6	52	40.9	34.5	28,977	36.6	28.9	35.7
Upper	17	27.9	53.2	16,846	45.9	64.2	37	29.1	51.5	32,343	40.9	61.6	43.8
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	61	100.0	100.0	36,712	100.0	100.0	127	100.0	100.0	79,075	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exen	npt					
Low	1	5.3	4.4	270	2.8	2.1	0	0.0	3.9	0	0.0	1.7	4.6
Moderate	5	26.3	13.7	1,993	21.0	6.9	5	31.3	13.2	2,405	21.7	6.0	15.7
Middle	7	36.8	33.2	3,254	34.3	21.9	2	12.5	29.9	1,430	12.9	17.5	35.7
Upper	6	31.6	48.4	3,967	41.8	69.0	8	50.0	52.9	6,832	61.7	74.7	43.8
Unknown	0	0.0	0.2	0	0.0	0.1	1	6.3	0.2	410	3.7	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	9,484	100.0	100.0	16	100.0	100.0	11,077	100.0	100.0	100.0
					Р	urpose No	t Applicable						
Low	0	0.0	7.4	0	0.0	5.3	0	0.0	8.6	0	0.0	6.6	4.6
Moderate	0	0.0	16.9	0	0.0	10.9	3	100.0	23.2	365	100.0	22.1	15.7
Middle	0	0.0	30.5	0	0.0	27.5	0	0.0	33.0	0	0.0	28.6	35.7

Rated Area: State of California

Upper	0	0.0	44.5	0	0.0	55.8	0	0.0	35.2	0	0.0	42.7	43.8
Unknown	0	0.0	0.7	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	365	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 18	- Distribu	tion of 2022	and 2023	Home M	ortgage Le	ending By	Income L	evel of Geog	raphy		
					Asses	sment Are	ea: Bay Ar	rea					
					Bank A	nd Aggreg	ate Loans E	By Year					0
Geographic				2022						023			Owner Occupied
Income Level	Ва	ınk	Agg	Ban	k	Agg	Ва	ınk	Agg	Ban	k	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purcha	ase Loans						
Low	15	6.1	3.6	7,455	3.1	2.1	16	5.4	3.7	8,894	3.9	2.1	3.0
Moderate	55	22.3	16.8	30,498	12.8	12.1	87	29.6	16.3	52,159	22.8	11.3	17.0
Middle	79	32.0	41.4	62,448	26.2	36.4	114	38.8	38.0	81,550	35.7	32.4	37.9
Upper	93	37.7	37.1	134,028	56.2	48.5	74	25.2	39.9	83,837	36.7	52.8	41.3
Unknown	5	2.0	1.0	3,861	1.6	0.9	3	1.0	2.1	1,892	0.8	1.4	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	247	100.0	100.0	238,290	100.0	100.0	294	100.0	100.0	228,332	100.0	100.0	100.0
						Refinance	Loans						
Low	16	5.2	3.4	9,694	3.3	2.1	9	4.9	3.7	4,836	3.5	1.7	3.0
Moderate	71	23.1	17.0	45,247	15.2	11.9	51	28.0	15.2	25,231	18.2	11.5	17.0
Middle	105	34.1	36.2	87,946	29.6	30.5	61	33.5	30.4	42,770	30.8	23.6	37.9
Upper	112	36.4	42.4	151,854	51.1	54.7	59	32.4	48.8	64,447	46.5	62.0	41.3
Unknown	4	1.3	0.9	2,425	0.8	0.9	2	1.1	1.9	1,400	1.0	1.2	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	308	100.0	100.0	297,166	100.0	100.0	182	100.0	100.0	138,684	100.0	100.0	100.0

					Hom	e Improve	ment Loan	ıs					
Low	0	0.0	1.9	0	0.0	1.2	2	5.4	2.0	554	2.8	1.2	3.0
Moderate	13	28.9	12.8	4,906	20.3	9.6	8	21.6	14.3	2,826	14.4	9.5	17.0
Middle	19	42.2	39.0	9,769	40.4	33.5	12	32.4	36.8	5,030	25.6	29.6	37.9
Upper	12	26.7	45.8	8,995	37.2	55.1	14	37.8	46.1	10,747	54.7	59.0	41.3
Unknown	1	2.2	0.5	500	2.1	0.6	1	2.7	0.7	500	2.5	0.7	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	45	100.0	100.0	24,170	100.0	100.0	37	100.0	100.0	19,657	100.0	100.0	100.0
	•					Multifam	ily Loans						Multi-family Units %
Low	8	33.3	11.3	9,688	30.7	10.2	1	8.3	12.4	825	3.2	10.3	11.4
Moderate	5	20.8	26.2	3,470	11.0	21.9	5	41.7	23.3	15,905	62.5	20.4	20.7
Middle	7	29.2	29.6	11,323	35.9	37.8	4	33.3	28.0	6,780	26.6	24.8	34.8
Upper	2	8.3	29.0	3,090	9.8	27.4	1	8.3	31.8	1,080	4.2	41.0	28.1
Unknown	2	8.3	3.9	4,000	12.7	2.8	1	8.3	4.4	865	3.4	3.5	5.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	31,571	100.0	100.0	12	100.0	100.0	25,455	100.0	100.0	100.0
		•			Tota	al Home M	ortgage Lo	ans					Owner Occupied Units %
Low	48	6.3	3.3	31,096	4.6	2.6	29	4.9	3.5	15,434	3.5	2.4	3.0
Moderate	181	23.9	16.3	97,694	14.4	12.4	168	28.4	15.2	102,576	22.9	11.3	17.0
Middle	260	34.3	38.6	202,129	29.7	33.8	218	36.8	33.6	146,316	32.7	27.6	37.9
Upper	256	33.8	40.8	338,428	49.8	50.1	170	28.7	45.7	178,378	39.9	57.2	41.3
Unknown	12	1.6	0.9	10,786	1.6	1.0	7	1.2	2.0	4,657	1.0	1.5	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	757	100.0	100.0	680,133	100.0	100.0	592	100.0	100.0	447,361	100.0	100.0	100.0

Rated Area: State of California

Table 19 - Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography

Assessment Area: San Jose-San Francisco-Oakland CA CSA

					Rank A	nd Aggrega	ate Loans By	Voor					
Geographic Income			20	22	Dalik Al	iu Aggrege	ate Loans by	icai	20	23			Owner Occupied Units
Level	Bar	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
		I	I.			Other Pu	rpose LOC		I		1		
Low	8	6.8	1.8	3,464	4.5	1.0	1	2.2	2.2	325	1.6	1.1	3.0
Moderate	34	28.8	12.5	11,753	15.4	8.3	9	19.6	12.1	1,704	8.4	6.0	17.0
Middle	46	39.0	37.4	27,527	36.1	30.4	19	41.3	31.0	5,896	29.0	21.6	37.9
Upper	30	25.4	47.8	33,521	44.0	59.9	17	37.0	53.9	12,378	61.0	70.6	41.3
Unknown	0	0.0	0.5	0	0.0	0.4	0	0.0	0.7	0	0.0	0.7	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	118	100.0	100.0	76,265	100.0	100.0	46	100.0	100.0	20,303	100.0	100.0	100.0
·					Othe	er Purpose	Closed/Exe	mpt					
Low	1	6.7	2.8	795	6.3	0.9	0	0.0	1.7	0	0.0	0.6	3.0
Moderate	3	20.0	14.4	1,820	14.4	4.8	8	38.1	11.6	4,751	31.8	3.3	17.0
Middle	4	26.7	32.8	3,116	24.6	16.5	8	38.1	29.9	4,290	28.7	11.8	37.9
Upper	7	46.7	49.5	6,940	54.8	76.9	5	23.8	55.6	5,889	39.4	83.0	41.3
Unknown	0	0.0	0.6	0	0.0	0.9	0	0.0	1.2	0	0.0	1.4	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	15	100.0	100.0	12,671	100.0	100.0	21	100.0	100.0	14,930	100.0	100.0	100.0
					P	urpose No	ot Applicable	1					
Low	0	0.0	3.7	0	0.0	1.9	0	0.0	3.4	0	0.0	1.8	3.0
Moderate	0	0.0	21.3	0	0.0	15.9	0	0.0	12.2	0	0.0	7.4	17.0
Middle	0	0.0	46.3	0	0.0	47.9	0	0.0	20.6	0	0.0	14.4	37.9
Upper	0	0.0	26.5	0	0.0	33.5	0	0.0	60.3	0	0.0	73.6	41.3
Unknown	0	0.0	2.2	0	0.0	0.9	0	0.0	3.5	0	0.0	2.7	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

Rated Area: State of California

Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0	1
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Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 20	- Distribut	tion of 2020	and 2021	Small Bu	siness Len	iding By R	evenue S	ize of Busin	esses		
					Assess	ment Are	a: Bay Are	ea					
					Bank A	and Aggreg	ate Loans E	By Year					
			2	020					2	021			Total
	Ва	ınk	Agg	Ban	k	Agg	Ва	nk	Agg	Ban	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	3,412	71.5	43.5	27,551	13.1	24.7	1,747	61.3	47.8	28,118	16.4	23.6	91.1
Over \$1 Million	38	0.8		17,685	8.4		101	3.5		34,508	20.1		8.4
Revenue Unknown	1,320	27.7		165,482	78.5		1,002	35.2		109,223	63.6		0.5
Total	4,770	100.0		210,718	100.0		2,850	100.0		171,849	100.0		100.0
						By Loan	Size						
\$100,000 or Less	4,282	89.8	88.1	48,044	22.8	34.4	2,450	86.0	92.5	36,623	21.3	37.3	
\$100,001 - \$250,000	261	5.5	6.9	41,054	19.5	19.9	209	7.3	4.3	33,414	19.4	18.3	
\$250,001 - \$1 Million	227	4.8	5.0	121,620	57.7	45.7	191	6.7	3.2	101,812	59.2	44.4	
Total	4,770	100.0	100.0	210,718	100.0	100.0	2,850	100.0	100.0	171,849	100.0	100.0	
				By L	oan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	3,393	99.4		15,849	57.5		1,714	98.1		10,034	35.7		
\$100,001 - \$250,000	1	0.0		235	0.9		5	0.3		807	2.9		
\$250,001 - \$1 Million	18	0.5		11,467	41.6		28	1.6		17,277	61.4		
Total	3,412	100.0		27,551	100.0		1,747	100.0		28,118	100.0		

		Table 21 -	Distribut	ion of 2022	and 2023	Small Bu	siness Len	iding By R	evenue Si	ze of Busin	esses		
					Assess	ment Are	a: Bay Are	ea					
					Bank A	nd Aggreg	ate Loans E	By Year					
			1	022		I -			1	023			Total
		ınk	Agg	Ban	1	Agg		ınk	Agg	Bar		Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Revei	nue						
\$1 Million or Less	3,079	97.3	55.2	27,706	50.4	31.8	2,645	96.0	58.7	35,519	43.2	33.4	91.2
Over \$1 Million	40	1.3		11,624	21.2		45	1.6		17,845	21.7		8.3
Revenue Unknown	46	1.5		15,602	28.4		64	2.3		28,854	35.1		0.5
Total	3,165	100.0		54,932	100.0		2,754	100.0		82,218	100.0		100.0
						By Loan	Size						
\$100,000 or Less	3,090	97.6	96.0	16,151	29.4	48.5	2,640	95.9	96.8	14,526	17.7	53.7	
\$100,001 - \$250,000	13	0.4	2.2	2,284	4.2	13.6	12	0.4	1.7	2,254	2.7	12.4	
\$250,001 - \$1 Million	62	2.0	1.9	36,497	66.4	37.9	102	3.7	1.5	65,438	79.6	33.9	
Total	3,165	100.0	100.0	54,932	100.0	100.0	2,754	100.0	100.0	82,218	100.0	100.0	
				By L	oan Size aı	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	3,056	99.3		15,460	55.8		2,610	98.7		13,820	38.9		
\$100,001 - \$250,000	4	0.1		700	2.5		3	0.1		550	1.5		
\$250,001 - \$1 Million	19	0.6		11,546	41.7		32	1.2		21,149	59.5		
Total	3,079	100.0		27,706	100.0		2,645	100.0		35,519	100.0		

Rated Area: State of California

Table 22 - Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Bay Area

Bank And Aggregate Loans By Year 2020 2021 **Borrower Income Families by Family** Level Bank Bank Agg Bank Agg **Bank** Income % Agg Agg # #% #% \$(000) \$% \$% # #% \$(000) \$% #% \$% **Home Purchase Loans** 1 0.5 1.4 235 0.2 0.6 3.1 1.5 3,845 1.7 0.6 24.6 Low Moderate 4 2.0 6.5 1,537 1.1 3.1 10 3.4 6.8 4,658 2.1 3.2 15.7 Middle 0 0.0 17.0 0 0.0 11.6 3 1.0 16.7 2,054 0.9 11.0 18.2 1 0.5 67.7 380 0.3 77.8 2 0.7 65.4 1,229 76.3 41.6 Upper 0.6 8.9 0.0 193 97.0 7.5 134,000 98.4 6.8 9.6 211,393 94.7 Unknown 271 91.9 Total 199 100.0 100.0 136,152 100.0 100.0 295 100.0 100.0 223,179 100.0 100.0 100.0 **Refinance Loans** 5 1.6 4.1 1,300 0.6 2.4 47 13.4 5.6 13,420 5.9 3.1 24.6 Low 25 8.1 12.4 27,909 12.3 7.7 15.7 Moderate 12.3 9,369 4.7 8.2 73 20.8 Middle 9 2.9 22.4 3.789 1.9 2.8 20.1 5,701 2.5 16.0 18.2 18.6 10 3.9 4.3 62.8 41.6 Upper 12 53.3 5,856 2.9 62.6 12 3.4 51.6 9,728 Unknown 256 83.4 7.9 180,355 89.9 8.1 209 59.5 10.3 169,759 74.9 10.4 0.0 **Total** 307 100.0 100.0 200,669 100.0 100.0 351 100.0 100.0 226,517 100.0 100.0 100.0 **Home Improvement Loans** 0 0 0.0 830 24.6 Low 0.0 4.3 2.4 4.7 2.0 3.4 0 0.0 10.3 0 0.0 8.3 1 1.2 9.9 0.3 6.9 15.7 Moderate 120 Middle 0.0 19.2 0 0.9 16.1 18.2 0 0.0 16.0 1 1.2 20.6 400 0 Upper 0 0.0 62.4 0.0 67.4 0 0.0 61.1 0 0.0 67.4 41.6 53 100.0 3.8 31,887 100.0 5.5 80 95.2 3.8 41,030 96.8 6.2 0.0 Unknown 53 100.0 100.0 31,887 100.0 100.0 84 100.0 100.0 42,380 100.0 100.0 100.0 Total **Total Home Mortgage Loans** Low 7 1.1 3.7 1,665 0.4 2.0 66 7.5 4.7 20,590 3.5 2.4 24.6 Moderate 30 4.7 11.3 11,095 2.7 7.0 85 9.7 11.1 33,242 5.7 6.3 15.7

Rated Area: State of California

Middle	9	1.4	21.2	3,789	0.9	16.8	16	1.8	19.4	9,189	1.6	14.4	18.2
Upper	15	2.3	55.7	7,032	1.7	65.9	16	1.8	54.8	11,894	2.0	66.9	41.6
Unknown	578	90.5	8.1	391,323	94.3	8.3	693	79.1	10.0	507,678	87.1	10.0	0.0
Total	639	100.0	100.0	414,904	100.0	100.0	876	100.0	100.0	582,593	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

		Table 23	3 - Distrib	ution of 202	20 and 20	21 Home	Mortgage	Lending E	By Borrov	ver Income	Level		
					Asse	ssment A	rea: Bay Ar	ea					
					Bank A	nd Aggreg	ate Loans By	Year					
Borrower Income			2020						20	21			Families by Family
Level	Bar	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	ık	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pur	pose LOC						
Low	0	0.0	4.6	0	0.0	3.6	5	3.9	4.4	2,130	2.7	5.0	24.6
Moderate	1	1.6	8.5	189	0.5	5.0	1	0.8	8.3	555	0.7	4.3	15.7
Middle	0	0.0	17.6	0	0.0	11.9	1	0.8	18.4	105	0.1	12.2	18.2
Upper	0	0.0	64.8	0	0.0	72.1	2	1.6	62.7	937	1.2	69.3	41.6
Unknown	60	98.4	4.6	36,523	99.5	7.4	118	92.9	6.1	75,348	95.3	9.3	0.0
Total	61	100.0	100.0	36,712	100.0	100.0	127	100.0	100.0	79,075	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exem	pt					
Low	1	5.3	6.2	130	1.4	2.2	0	0.0	7.1	0	0.0	3.1	24.6
Moderate	0	0.0	10.8	0	0.0	4.2	0	0.0	10.8	0	0.0	3.9	15.7
Middle	0	0.0	16.6	0	0.0	8.2	1	6.3	16.1	929	8.4	7.0	18.2
Upper	2	10.5	60.7	796	8.4	71.7	0	0.0	59.3	0	0.0	71.0	41.6
Unknown	16	84.2	5.7	8,558	90.2	13.7	15	93.8	6.7	10,148	91.6	15.0	0.0
Total	19	100.0	100.0	9,484	100.0	100.0	16	100.0	100.0	11,077	100.0	100.0	100.0

Rated Area: State of California

Purpose Not Applicable													
Low	0	0.0	0.1	0	0.0	0.0	3	100.0	1.5	0	0.0	0.2	24.6
Moderate	0	0.0	1.2	0	0.0	0.5	0	0.0	0.5	0	0.0	0.4	15.7
Middle	0	0.0	1.6	0	0.0	0.9	0	0.0	0.2	365	100.0	0.3	18.2
Upper	0	0.0	2.2	0	0.0	3.1	0	0.0	0.2	0	0.0	0.3	41.6
Unknown	0	0.0	95.0	0	0.0	95.5	0	0.0	97.6	0	0.0	98.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	365	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table	e 24 - Distr	ibution of 202		23 Home N			/ Borrowe	r Income Lev	el			
	Bank And Aggregate Loans By Year													
Borrower Income Level	2022							2023						
	Bank		Agg Bank		•	Agg	Bank		Agg	Bank		Agg	Family Income %	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
					Н	ome Purcha	se Loans							
Low	3	1.2	1.8	868	0.4	0.7	6	2.0	1.3	2,194	1.0	0.5	23.4	
Moderate	16	6.5	7.3	7,860	3.3	3.0	14	4.8	5.3	6,948	3.0	2.1	16.0	
Middle	6	2.4	15.7	3,964	1.7	9.9	20	6.8	11.9	14,596	6.4	7.1	18.4	
Upper	8	3.2	64.7	11,203	4.7	76.4	17	5.8	47.4	17,865	7.8	54.5	42.2	
Unknown	214	86.6	10.6	214,395	90.0	9.9	237	80.6	34.0	186,729	81.8	35.8	0.0	
Total	247	100.0	100.0	238,290	100.0	100.0	294	100.0	100.0	228,332	100.0	100.0	100.0	
	•	•	•		•	Refinance	Loans	•		•			•	
Low	6	1.9	10.6	1,933	0.7	6.3	11	6.0	4.2	3,636	2.6	1.5	23.4	
Moderate	9	2.9	13.7	5,263	1.8	7.9	6	3.3	5.5	2,244	1.6	1.8	16.0	
Middle	8	2.6	17.5	6,765	2.3	13.2	2	1.1	7.4	1,370	1.0	2.9	18.4	
Upper	7	2.3	44.8	9,017	3.0	58.1	10	5.5	18.4	9,351	6.7	13.5	42.2	
Unknown	278	90.3	13.4	274,188	92.3	14.5	153	84.1	64.6	122,083	88.0	80.3	0.0	
Total	308	100.0	100.0	297,166	100.0	100.0	182	100.0	100.0	138,684	100.0	100.0	100.0	

					Hom	ie Improvei	ment Loans	ì							
Low	0	0.0	4.2	0	0.0	2.6	0	0.0	4.9	0	0.0	2.4	23.4		
Moderate	0	0.0	11.0	0	0.0	6.7	0	0.0	10.2	0	0.0	5.1	16.0		
Middle	0	0.0	20.5	0	0.0	15.0	0	0.0	17.9	0	0.0	11.5	18.4		
Upper	0	0.0	60.5	0	0.0	71.0	0	0.0	45.2	0	0.0	49.5	42.2		
Unknown	45	100.0	3.8	24,170	100.0	4.8	37	100.0	21.7	19,657	100.0	31.5	0.0		
Total	45	100.0	100.0	24,170	100.0	100.0	37	100.0	100.0	19,657	100.0	100.0	100.0		
	Total Home Mortgage Loans														
Low	9	1.2	5.7	2,801	0.4	2.9	20	3.4	2.5	6,541	1.6	0.8	23.4		
Moderate	27	3.7	10.3	14,138	2.2	4.9	20	3.4	5.5	9,192	2.2	1.9	16.0		
Middle	14	1.9	17.1	10,729	1.7	11.2	24	4.1	10.1	15,976	3.8	5.4	18.4		
Upper	15	2.0	56.0	20,220	3.1	69.3	27	4.7	34.0	27,216	6.5	37.9	42.2		
Unknown	668	91.1	10.8	600,674	92.6	11.6	489	84.3	47.9	362,981	86.0	53.9	0.0		
Total	733	100.0	100.0	648,562	100.0	100.0	580	100.0	100.0	421,906	100.0	100.0	100.0		

		Table 25	5 - Distrib	ution of 20	22 and 20	023 Home	Mortgage	Lending I	By Borrov	wer Income	Level			
					Asse	ssment A	rea: Bay Ar	rea						
					Bank A	nd Aggreg	ate Loans By	/ Year						
Borrower Income	orrower Income 2022 2023													
Level	Ban	ık	Agg	Ban	ık	Agg	Bar	nk	Agg	Ban	k	Agg	Income %	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
						Other Pur	pose LOC							
Low	0	0.0	4.5	0	0.0	5.3	1	2.2	4.3	385	1.9	2.8	23.4	
Moderate	0	0.0	9.0	0	0.0	4.8	0	0.0	8.1	0	0.0	3.4	16.0	
Middle	0	0.0	20.1	0	0.0	13.3	2	4.3	13.8	10	0.0	7.1	18.4	
Upper	0	0.0	59.1	0	0.0	67.2	0	0.0	33.5	0	0.0	32.5	42.2	
Unknown	118	100.0	7.3	76,265	100.0	9.5	43	93.5	40.3	19,908	98.1	54.1	0.0	
Total	118	100.0	100.0	76,265	100.0	100.0	46	100.0	100.0	20,303	100.0	100.0	100.0	
					Othe	r Purpose	Closed/Exen	npt						
Low	0	0.0	7.7	0	0.0	3.3	2	9.5	5.0	326	2.2	1.0	23.4	

Rated Area: State of California

Moderate	2	13.3	11.5	1,015	8.0	3.5	0	0.0	9.8	0	0.0	1.7	16.0
Middle	0	0.0	15.3	0	0.0	5.3	0	0.0	11.8	0	0.0	2.2	18.4
Upper	0	0.0	55.2	0	0.0	70.5	0	0.0	29.8	0	0.0	26.6	42.2
Unknown	13	86.7	10.3	11,656	92.0	17.4	19	90.5	43.6	14,604	97.8	68.5	0.0
Total	15	100.0	100.0	12,671	100.0	100.0	21	100.0	100.0	14,930	100.0	100.0	100.0
					Pı	urpose No	t Applicable						
Low	0	0.0	0.7	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	23.4
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.4
Upper	0	0.0	0.7	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	42.2
Unknown	0	0.0	98.5	0	0.0	99.8	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 2	6 - Distrib	ution of 202	20 and 202	21 Small B	usiness Le	ending By	Income Le	evel of Geog	raphy			
					Assess	ment Are	a: Sacram	ento						
					Bank A	And Aggreg	ate Loans I	By Year						
Geographic	2020													
Income Level	Ba	Bank Agg Bank Agg Bank Agg Bank Agg												
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
Low	5	18.5	12.3	861	21.2	15.6	5	20.0	11.6	1,635	30.1	15.5	12.1	
Moderate	11	40.7	24.8	2,719	66.9	25.7	8	32.0	25.4	2,694	49.6	26.2	26.1	
Middle	8	29.6	29.5	342	8.4	24.5	10	40.0	30.4	1,079	19.9	25.5	31.0	
Upper	3	11.1	30.9	144	3.5	30.3	2	8.0	30.5	20	0.4	29.6	28.4	
Unknown	0	0.0	1.9	0	0.0	3.1	0	0.0	1.6	0	0.0	3.0	2.5	
Tract-Unk	0	0.0	0.6	0	0.0	0.8	0	0.0	0.6	0	0.0	0.2		
Total	27	100.0	100.0	4,066	100.0	100.0	25	100.0	100.0	5,428	100.0	100.0	100.0	

Table 27 - Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography
Assessment Area: Sacramento

					Bank A	And Aggreg	ate Loans I	By Year					
Geographic			2	022					2	023			Total
Income Level	Ва	ank	Agg	Ban	ık	Agg	Ва	ınk	Agg	Ban	k	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	9.7	0	0.0	13.8	2	12.5	8.8	1,176	58.4	11.9	10.3
Moderate	4	57.1	25.1	901	96.8	24.1	8	50.0	27.4	100	5.0	23.7	26.1
Middle	1	14.3	33.3	10	1.1	32.2	4	25.0	31.2	716	35.6	33.0	34.9
Upper	2	28.6	30.1	20	2.1	28.0	2	12.5	31.1	20	1.0	29.9	26.9
Unknown	0	0.0	1.4	0	0.0	1.8	0	0.0	1.1	0	0.0	1.5	1.8
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
Total	7	100.0	100.0	931	100.0	100.0	16	100.0	100.0	2,012	100.0	100.0	100.0

		Table 28	- Distribu	tion of 2020			ortgage Le		Income Le	evel of Geog	raphy		
					Bank A	And Aggreg	ate Loans E	By Year					_
Geographic			2	020					2	021			Owner
Income Level	Ва	nk	Agg	Ban	k	Agg	Ва	nk	Agg	Bar	ık	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	S.I.LS 75
					H	ome Purch	ase Loans						
Low	3	15.0	11.3	428	11.4	8.8	8	20.5	10.6	2,041	21.3	8.1	6.9
Moderate	7	35.0	24.7	1,115	29.7	20.1	17	43.6	25.4	3,699	38.5	21.0	24.4
Middle	5	25.0	33.1	1,145	30.5	32.6	6	15.4	33.1	1,351	14.1	32.7	36.0
Upper	5	25.0	30.7	1,067	28.4	38.4	8	20.5	30.7	2,506	26.1	38.0	32.7
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	3,755	100.0	100.0	39	100.0	100.0	9,597	100.0	100.0	100.0

						Refinance	Loans						
Low	0	0.0	5.6	0	0.0	4.5	3	13.0	7.0	527	9.3	5.6	6.9
Moderate	9	64.3	18.5	1,589	58.2	15.0	11	47.8	21.4	2,459	43.5	17.6	24.4
Middle	3	21.4	37.2	544	19.9	35.3	6	26.1	36.8	1,686	29.8	35.1	36.0
Upper	2	14.3	38.6	596	21.8	45.0	3	13.0	34.6	983	17.4	41.6	32.7
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	2,729	100.0	100.0	23	100.0	100.0	5,655	100.0	100.0	100.0
					Hon	ne Improve	ment Loan	s					
Low	0	0.0	4.7	0	0.0	4.2	3	23.1	4.8	460	16.4	4.1	6.9
Moderate	2	66.7	15.9	221	52.5	14.3	4	30.8	15.6	991	35.4	13.9	24.4
Middle	1	33.3	34.1	200	47.5	32.5	4	30.8	35.4	861	30.7	33.7	36.0
Upper	0	0.0	45.1	0	0.0	48.9	2	15.4	44.1	489	17.5	48.2	32.7
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	421	100.0	100.0	13	100.0	100.0	2,801	100.0	100.0	100.0
						Multifam	ily Loans						Multi-family Units %
Low	1	50.0	24.5	3,611	92.8	19.2	3	100.0	20.7	2,510	100.0	12.5	19.9
Moderate	1	50.0	31.5	280	7.2	30.4	0	0.0	31.9	0	0.0	32.9	31.0
Middle	0	0.0	39.1	0	0.0	47.6	0	0.0	30.7	0	0.0	30.6	34.3
Upper	0	0.0	4.9	0	0.0	2.8	0	0.0	14.7	0	0.0	23.4	13.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	2.0	0	0.0	0.6	1.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	3,891	100.0	100.0	3	100.0	100.0	2,510	100.0	100.0	100.0
					Tot	al Home M	ortgage Lo	ans					Owner Occupied Units %
Low	10	20.0	7.1	4,857	37.6	6.2	17	19.8	7.9	5,538	24.7	6.7	6.9
Moderate	21	42.0	20.1	3,523	27.2	16.9	35	40.7	22.4	7,594	33.9	19.4	24.4
Middle	12	24.0	36.1	2,890	22.3	35.0	18	20.9	35.7	4,420	19.7	34.1	36.0
Upper	7	14.0	36.6	1,663	12.9	41.9	16	18.6	33.9	4,847	21.6	39.7	32.7

Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	50	100.0	100.0	12,933	100.0	100.0	86	100.0	100.0	22,399	100.0	100.0	100.0

	1	Гable 29 -	Distribu	tion of 2020			Mortgage ea: Sacran	_	By Income	Level of G	eography		
	1												
Coographic			20)20	Dank Ar	iu Aggrega	ate Loans B	y rear	20	021			Owner Occurios
Geographic Income Level	Bar	ık	Agg	Ban	ık	Agg	Bai	nk	Agg	Ban	ık	Agg	Owner Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
				.,,,		Other Pu	rpose LOC	ı		.,,,			
Low	0	0.0	3.3	0	0.0	2.6	0	0.0	4.2	0	0.0	3.1	6.9
Moderate	1	25.0	17.8	159	13.7	12.9	1	25.0	17.2	189	26.4	13.6	24.4
Middle	3	75.0	32.3	1,001	86.3	27.4	2	50.0	30.5	522	72.9	27.8	36.0
Upper	0	0.0	46.4	0	0.0	57.0	1	25.0	48.1	5	0.7	55.5	32.7
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	1,160	100.0	100.0	4	100.0	100.0	716	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exe	empt					
Low	0	0.0	6.5	0	0.0	4.4	0	0.0	7.5	0	0.0	5.7	6.9
Moderate	0	0.0	18.9	0	0.0	13.4	0	0.0	17.3	0	0.0	15.4	24.4
Middle	0	0.0	38.2	0	0.0	33.5	0	0.0	34.3	0	0.0	27.2	36.0
Upper	0	0.0	36.4	0	0.0	48.7	2	100.0	40.5	864	100.0	51.3	32.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.4	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	864	100.0	100.0	100.0
					Р	urpose No	t Applicabl	е					
Low	6	85.7	11.5	818	83.7	8.6	0	0.0	9.4	0	0.0	6.9	6.9
Moderate	1	14.3	30.1	159	16.3	24.0	2	100.0	31.4	256	100.0	25.5	24.4

Rated Area: State of California

Middle	0	0.0	36.5	0	0.0	36.4	0	0.0	42.8	0	0.0	46.7	36.0
Upper	0	0.0	21.8	0	0.0	30.9	0	0.0	16.4	0	0.0	20.9	32.7
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	977	100.0	100.0	2	100.0	100.0	256	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 30	- Distribu	tion of 2022		Home Mome Moment Area			Income Le	evel of Geog	raphy		
Assessment					Bank A	And Aggreg	ate Loans E	By Year					
Area:			2	022					2	023			Owner
Sacramento	Ва	ank	Agg	Ban	k	Agg	Ва	ınk	Agg	Ban	k	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	G 111 . 13 / 0
		· ·			Н	ome Purcha	se Loans	•				1	
Low	8	16.0	6.6	2,760	16.3	4.9	8	8.2	6.6	3,018	8.3	4.7	5.3
Moderate	24	48.0	25.7	8,117	47.9	20.7	49	50.0	24.4	15,755	43.4	19.5	23.9
Middle	9	18.0	33.1	2,485	14.7	31.6	28	28.6	32.7	11,946	32.9	31.3	39.6
Upper	9	18.0	34.4	3,567	21.1	42.6	13	13.3	35.9	5,588	15.4	44.2	31.0
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.4	0	0.0	0.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	50	100.0	100.0	16,929	100.0	100.0	98	100.0	100.0	36,307	100.0	100.0	100.0
						Refinance	Loans						
Low	4	10.0	6.6	1,242	11.7	5.3	1	5.6	6.4	200	4.6	5.0	5.3
Moderate	20	50.0	26.7	5,136	48.5	21.8	12	66.7	27.6	2,604	60.3	31.4	23.9
Middle	11	27.5	39.1	2,744	25.9	38.3	3	16.7	37.5	600	13.9	33.4	39.6
Upper	5	12.5	27.3	1,462	13.8	34.3	2	11.1	28.2	913	21.1	29.9	31.0
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.4	0	0.0	0.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	40	100.0	100.0	10,584	100.0	100.0	18	100.0	100.0	4,317	100.0	100.0	100.0

					Hon	ne Improve	ment Loan	s					
Low	0	0.0	3.6	0	0.0	2.8	0	0.0	4.3	0	0.0	3.8	5.3
Moderate	4	50.0	16.9	684	41.0	13.8	3	60.0	21.2	453	42.2	17.9	23.9
Middle	1	12.5	39.5	134	8.0	36.2	0	0.0	37.9	0	0.0	34.3	39.6
Upper	3	37.5	39.8	850	51.0	47.0	2	40.0	36.4	620	57.8	43.8	31.0
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	1,668	100.0	100.0	5	100.0	100.0	1,073	100.0	100.0	100.0
						Multifam	nily Loans						Multi-family Units %
Low	0	0.0	18.6	0	0.0	25.0	0	0.0	19.7	0	0.0	15.2	19.5
Moderate	0	0.0	34.0	0	0.0	24.9	0	0.0	40.9	0	0.0	33.3	33.4
Middle	0	0.0	30.4	0	0.0	37.4	0	0.0	22.7	0	0.0	26.1	32.1
Upper	0	0.0	16.0	0	0.0	12.6	0	0.0	16.7	0	0.0	25.4	14.0
Unknown	0	0.0	1.0	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
	·				Tot	al Home M	lortgage Lo	ans					Owner Occupied Units %
Low	14	12.4	6.2	4,012	12.8	6.6	11	8.3	6.2	3,484	8.1	5.3	5.3
Moderate	56	49.6	24.9	15,152	48.5	21.1	68	51.1	24.4	19,087	44.3	21.8	23.9
Middle	24	21.2	36.0	5,597	17.9	34.2	34	25.6	34.4	12,878	29.9	31.4	39.6
Upper	19	16.8	32.6	6,486	20.8	37.9	20	15.0	34.6	7,646	17.7	41.2	31.0
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	113	100.0	100.0	31,247	100.0	100.0	133	100.0	100.0	43,095	100.0	100.0	100.0

Rated Area: State of California

Table 31 - Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography **Assessment Area: Sacramento Bank And Aggregate Loans By Year** 2022 2023 **Geographic Income Owner Occupied Units** Level % Bank Bank Bank Agg Bank Agg Agg Agg # #% #% \$(000) \$% \$% #% #% \$(000) \$% \$% Other Purpose LOC 2 22.2 3.0 10 0 0 3.8 5.3 1.6 2.3 0.0 4.4 0.0 Low Moderate 4 44.4 16.2 20 3.3 11.2 2 40.0 20.9 10 4.5 16.8 23.9 2 22.2 Middle 35.7 104 16.9 32.3 1 20.0 38.7 5 2.3 35.4 39.6 1 11.1 45.1 480 78.2 54.2 2 40.0 35.8 205 93.2 43.5 31.0 Upper Unknown 0 0.0 0.1 0 0.0 0.0 0 0.0 0.3 0 0.0 0.4 0.2 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0.0 0.0 Tract-Unk 0.0 0.0 5 Total 9 100.0 100.0 614 100.0 100.0 100.0 100.0 220 100.0 100.0 100.0 Other Purpose Closed/Exempt 0.0 0 0 4.3 0.0 4.3 2 28.6 5.7 266 22.6 4.3 5.3 Low 4 22.2 1.195 82.3 19.6 2 28.6 23.3 22.5 24.0 23.9 Moderate 66.7 265 Middle 1 38.0 130 9.0 2 28.6 35.1 327 27.8 31.5 39.6 16.7 32.8 27.2 40.0 1 16.7 35.0 127 8.7 42.5 1 14.3 35.5 320 31.0 Upper 0 0.0 0.5 0 0.0 0 0.0 0.4 0 0.0 0.1 0.2 Unknown 0.8 Tract-Unk 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0.0 Total 6 100.0 100.0 1,452 100.0 100.0 100.0 100.0 1,178 100.0 100.0 100.0 **Purpose Not Applicable** 0 Low 0 0.0 8.4 0.0 5.7 0.0 10.8 0 0.0 4.8 5.3 Moderate 0 0.0 40.0 0 0.0 0 0.0 35.3 0 0.0 22.0 23.9 32.3 Middle 0 0.0 36.8 0 0.0 0 0 0.0 37.1 39.6 41.0 0.0 34.3 0 0.0 14.2 0 0.0 20.2 0 0.0 19.6 0 0.0 36.0 31.0 Upper Unknown 0 0.0 0.6 0 0.0 0.7 0 0.0 0.0 0 0.0 0.0 0.2

0

0.0

0.0

0

0.0

0.0

Tract-Unk

0

0.0

0.0

0

0.0

0.0

Rated Area: State of California

Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0	1
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Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 32	- Distribut	ion of 2020	and 2021	Small Bu	siness Ler	nding By R	Revenue S	ize of Busin	esses		
					Assessm	nent Area	: Sacrame	nto					
					Bank A	nd Aggreg	ate Loans	By Year					
			2	020					2	021			Total
	В	ank	Agg	Bar	nk	Agg	Ва	ank	Agg	Bar	nk 	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	7	25.9	41.3	460	11.3	25.3	13	52.0	48.6	2,923	53.9	28.0	93.6
Over \$1 Million	0	0.0		0	0.0		3	12.0		1,525	28.1		5.8
Revenue Unknown	20	74.1		3,606	88.7		9	36.0		980	18.1		0.6
Total	27	100.0		4,066	100.0		25	100.0		5,428	100.0		100.0
						By Loan	Size						
\$100,000 or Less	17	63.0	89.6	512	12.6	37.8	15	60.0	93.6	394	7.3	39.3	
\$100,001 - \$250,000	4	14.8	6.4	538	13.2	21.0	3	12.0	3.7	408	7.5	17.7	
\$250,001 - \$1 Million	6	22.2	4.0	3,016	74.2	41.2	7	28.0	2.8	4,626	85.2	43.0	
Total	27	100.0	100.0	4,066	100.0	100.0	25	100.0	100.0	5,428	100.0	100.0	
				Ву І	Loan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	6	85.7		60	13.0		9	69.2		100	3.4		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	1	14.3		400	87.0		4	30.8		2,823	96.6		
Total	7	100.0		460	100.0		13	100.0		2,923	100.0		

		Table 33	Distribut	ion of 2022	and 2023	Small Bu	siness Ler	nding By R	evenue S	ize of Busin	esses		
					Assessm	nent Area	: Sacrame	nto					
					Bank A	and Aggreg	ate Loans I	By Year					
			2	022					2	023			Total
	Ва	ank	Agg	Bar	nk	Agg	Ва	ınk	Agg	Bar	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	6	85.7	55.7	387	41.6	34.9	13	81.3	58.5	1,406	69.9	36.2	94.3
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		5.1
Revenue Unknown	1	14.3		544	58.4		3	18.8		606	30.1		0.6
Total	7	100.0		931	100.0		16	100.0		2,012	100.0		100.0
						By Loan	Size						
\$100,000 or Less	5	71.4	95.7	50	5.4	46.0	13	81.3	96.4	136	6.8	50.3	
\$100,001 - \$250,000	0	0.0	2.4	0	0.0	14.8	0	0.0	2.0	0	0.0	13.4	
\$250,001 - \$1 Million	2	28.6	1.9	881	94.6	39.3	3	18.8	1.6	1,876	93.2	36.3	
Total	7	100.0	100.0	931	100.0	100.0	16	100.0	100.0	2,012	100.0	100.0	
				Ву І	oan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	5	83.3		50	12.9		11	84.6		76	5.4		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	1	16.7		337	87.1		2	15.4		1,330	94.6		
Total	6	100.0		387	100.0		13	100.0		1,406	100.0		

		Table 34	4 - Distrik	oution of 20			e Mortgage	<u> </u>	By Borro	ower Incom	e Level		
							rea: Sacram						
			2020		Bank Ar	nd Aggreg	ate Loans By	Year	20	21			
Borrower Income Level	Ban	nk	Agg	Ban	k	Agg	Ban	k	Agg	Ban	ık	Agg	Families by Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
		1	,	7(000)			chase Loans			7(000)	***	• • • • • • • • • • • • • • • • • • • •	
Low	0	0.0	3.1	0	0.0	1.7	6	15.4	2.5	1,459	15.2	1.4	26.7
Moderate	0	0.0	18.1	0	0.0	13.6	3	7.7	15.6	736	7.7	11.5	17.3
Middle	0	0.0	28.7	0	0.0	26.3	5	12.8	26.4	1,700	17.7	24.4	18.6
Upper	0	0.0	42.7	0	0.0	50.7	1	2.6	41.0	388	4.0	48.3	37.4
Unknown	20	100.0	7.3	3,755	100.0	7.6	24	61.5	14.5	5,314	55.4	14.4	0.0
Total	20	100.0	100.0	3,755	100.0	100.0	39	100.0	100.0	9,597	100.0	100.0	100.0
			•			Refinar	nce Loans		•				
Low	0	0.0	4.2	0	0.0	2.5	6	26.1	6.0	1,304	23.1	3.8	26.7
Moderate	2	14.3	14.3	451	16.5	10.9	6	26.1	16.8	1,654	29.2	13.2	17.3
Middle	0	0.0	23.8	0	0.0	21.7	0	0.0	24.2	0	0.0	22.8	18.6
Upper	0	0.0	40.8	0	0.0	46.3	0	0.0	37.1	0	0.0	43.4	37.4
Unknown	12	85.7	16.9	2,278	83.5	18.6	11	47.8	15.9	2,697	47.7	16.9	0.0
Total	14	100.0	100.0	2,729	100.0	100.0	23	100.0	100.0	5,655	100.0	100.0	100.0
					Но	me Impro	vement Loa	ns					
Low	0	0.0	4.8	0	0.0	3.5	0	0.0	3.8	0	0.0	3.2	26.7
Moderate	0	0.0	12.0	0	0.0	10.7	0	0.0	12.7	0	0.0	10.6	17.3
Middle	0	0.0	25.3	0	0.0	23.5	0	0.0	24.7	0	0.0	21.6	18.6
Upper	0	0.0	53.1	0	0.0	56.0	0	0.0	54.9	0	0.0	59.2	37.4
Unknown	3	100.0	4.7	421	100.0	6.2	13	100.0	3.9	2,801	100.0	5.4	0.0
Total	3	100.0	100.0	421	100.0	100.0	13	100.0	100.0	2,801	100.0	100.0	100.0
		1	1		Tot	al Home N	/lortgage Loa	ns	1		_	,	
Low	5	10.4	3.9	720	8.0	2.3	13	15.7	5.0	2,879	14.5	3.0	26.7
Moderate	4	8.3	15.0	708	7.8	11.5	10	12.0	16.3	2,530	12.7	12.6	17.3

Rated Area: State of California

Middle	0	0.0	24.8	0	0.0	22.8	6	7.2	24.7	1,705	8.6	23.2	18.6
Upper	0	0.0	41.3	0	0.0	47.5	1	1.2	38.7	388	2.0	45.2	37.4
Unknown	39	81.3	14.9	7,614	84.2	15.9	53	63.9	15.3	12,387	62.3	16.1	0.0
Total	48	100.0	100.0	9,042	100.0	100.0	83	100.0	100.0	19,889	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

		Table 35	5 - Distrib	ution of 202			Mortgage		By Borrov	ver Income	Level		
					Bank A	nd Aggreg	ate Loans By	Year					
Borrower Income			2020						20	21			Families by Family
Level	Bar	ık	Agg	Ban	k	Agg	Ban	ık	Agg	Ban	ık	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					•	Other Pur	pose LOC						
Low	0	0.0	5.1	0	0.0	3.8	0	0.0	3.1	0	0.0	2.6	26.7
Moderate	0	0.0	9.0	0	0.0	5.2	0	0.0	9.6	0	0.0	5.8	17.3
Middle	0	0.0	22.0	0	0.0	14.5	1	25.0	25.6	5	0.7	20.4	18.6
Upper	0	0.0	59.1	0	0.0	70.9	0	0.0	56.7	0	0.0	65.6	37.4
Unknown	4	100.0	4.8	1,160	100.0	5.7	3	75.0	5.0	711	99.3	5.6	0.0
Total	4	100.0	100.0	1,160	100.0	100.0	4	100.0	100.0	716	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exem	npt					
Low	0	0.0	7.0	0	0.0	3.9	0	0.0	6.7	0	0.0	5.1	26.7
Moderate	0	0.0	12.7	0	0.0	10.0	0	0.0	17.5	0	0.0	13.1	17.3
Middle	0	0.0	23.0	0	0.0	17.8	0	0.0	19.5	0	0.0	13.3	18.6
Upper	0	0.0	51.9	0	0.0	62.8	0	0.0	49.7	0	0.0	60.0	37.4
Unknown	0	0.0	5.4	0	0.0	5.5	2	100.0	6.7	864	100.0	8.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	864	100.0	100.0	100.0

Rated Area: State of California

					Pı	urpose No	t Applicable							
Low	5	71.4	0.6	0	0.0	0.4	1	50.0	0.3	0	0.0	0.2	26.7	
Moderate														
Middle														
Upper	0	0.0	0.6	257	26.3	1.5	0	0.0	0.0	140	54.7	0.0	37.4	
Unknown	0	0.0	98.2	0	0.0	97.7	0	0.0	99.0	0	0.0	99.6	0.0	
Total	7	100.0	100.0	977	100.0	100.0	2	100.0	100.0	256	100.0	100.0	100.0	

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 36	5 - Distrib	oution of 20			e Mortgage rea: Sacram	_	By Borro	ower Incom	e Level		
					Bank Ar	nd Aggreg	ate Loans By	Year					
Borrower Income			2022						20	23			Families by Family
Level	Ban	ık	Agg	Ban	k	Agg	Bar	k	Agg	Ban	k	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					İ	Home Pur	chase Loans						
Low	3	6.0	2.1	655	3.9	1.1	12	12.2	2.4	2,806	7.7	1.2	26.1
Moderate	15	30.0	14.1	5,334	31.5	9.3	41	41.8	14.1	14,950	41.2	9.7	18.1
Middle	12	24.0	25.0	5,588	33.0	22.7	23	23.5	24.7	10,021	27.6	22.4	19.2
Upper	0	0.0	44.8	0	0.0	53.0	6	6.1	38.4	3,013	8.3	46.4	36.6
Unknown	20	40.0	13.9	5,352	31.6	13.9	16	16.3	20.4	5,517	15.2	20.3	0.0
Total	50	100.0	100.0	16,929	100.0	100.0	98	100.0	100.0	36,307	100.0	100.0	100.0
						Refinar	ice Loans						
Low	7	17.5	11.2	1,621	15.3	7.2	6	33.3	10.7	1,106	25.6	6.8	26.1
Moderate	7	17.5	20.9	1,811	17.1	17.3	8	44.4	22.0	1,891	43.8	16.3	18.1
Middle	5	12.5	24.6	1,551	14.7	24.5	0	0.0	23.5	0	0.0	19.4	19.2
Upper	1	2.5	30.7	534	5.0	37.5	1	5.6	29.3	599	13.9	31.5	36.6
Unknown	20	50.0	12.7	5,067	47.9	13.6	3	16.7	14.5	721	16.7	26.0	0.0
Total	40	100.0	100.0	10,584	100.0	100.0	18	100.0	100.0	4,317	100.0	100.0	100.0

Rated Area: State of California

					Но	me Impro	vement Loa	ns					
Low	0	0.0	4.4	0	0.0	4.1	0	0.0	7.0	0	0.0	4.6	26.1
Moderate	0	0.0	14.5	0	0.0	10.6	0	0.0	18.7	0	0.0	13.7	18.1
Middle	0	0.0	26.2	0	0.0	21.8	0	0.0	27.2	0	0.0	23.0	19.2
Upper	0	0.0	51.2	0	0.0	59.6	0	0.0	41.1	0	0.0	52.1	36.6
Unknown	8	100.0	3.8	1,668	100.0	3.9	5	100.0	6.0	1,073	100.0	6.5	0.0
Total	8	100.0	100.0	1,668	100.0	100.0	5	100.0	100.0	1,073	100.0	100.0	100.0
					Tot	al Home N	Mortgage Loa	ans					
Low	10	8.8	5.7	2,276	7.3	3.2	22	16.5	4.6	4,445	10.3	2.1	26.1
Moderate	29	25.7	16.4	7,302	23.4	11.9	51	38.3	16.3	16,923	39.3	10.8	18.1
Middle	18	15.9	24.9	7,144	22.9	23.1	25	18.8	24.8	10,031	23.3	22.0	19.2
Upper	1	0.9	40.4	534	1.7	48.2	8	6.0	36.8	3,617	8.4	44.5	36.6
Unknown	55	48.7	12.6	13,991	44.8	13.6	27	20.3	17.6	8,079	18.7	20.6	0.0
Total	113	100.0	100.0	31,247	100.0	100.0	133	100.0	100.0	43,095	100.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

		Table 37	' - Distrib	ution of 202	22 and 20	023 Home	Mortgage	Lending I	By Borrov	ver Income	Level			
					Assess	sment Are	ea: Sacrame	nto						
					Bank A	nd Aggreg	ate Loans By	Year						
Borrower Income														
Level	Bank Agg Bank Agg Bank Agg Bank Agg												Income %	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
						Other Pur	pose LOC							
Low	0	0.0	5.0	0	0.0	4.2	0	0.0	5.6	0	0.0	6.6	26.1	
Moderate	6	66.7	11.0	30	4.9	6.9	1	20.0	17.4	5	2.3	11.9	18.1	
Middle	1	11.1	25.6	5	0.8	20.2	2	40.0	26.6	10	4.5	22.8	19.2	
Upper	0	0.0	49.2	0	0.0	59.5	1	20.0	35.4	5	2.3	45.9	36.6	

Rated Area: State of California

Unknown	2	22.2	9.3	579	94.3	9.2	1	20.0	15.0	200	90.9	12.8	0.0
Total	9	100.0	100.0	614	100.0	100.0	5	100.0	100.0	220	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exem	ıpt					
Low	0	0.0	7.2	0	0.0	6.5	4	57.1	8.8	533	45.2	6.2	26.1
Moderate	1	16.7	15.3	127	8.7	11.3	1	14.3	23.5	77	6.5	16.9	18.1
Middle	0	0.0	24.1	0	0.0	18.6	0	0.0	26.7	0	0.0	20.5	19.2
Upper	0	0.0	44.4	0	0.0	54.5	0	0.0	34.3	0	0.0	42.9	36.6
Unknown	5	83.3	9.0	1,325	91.3	9.2	2	28.6	6.7	568	48.2	13.5	0.0
Total	6	100.0	100.0	1,452	100.0	100.0	7	100.0	100.0	1,178	100.0	100.0	100.0
					Pı	urpose No	t Applicable						
Low	0	0.0	1.3	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	26.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	1.0	0	0.0	0.0	18.1
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.2
Upper	0	0.0	0.6	0	0.0	1.3	0	0.0	0.0	0	0.0	0.0	36.6
Unknown	0	0.0	98.1	0	0.0	98.1	0	0.0	99.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 3	8 - Distrib	ution of 202			usiness Le ea: San Di	• .	Income Le	evel of Geog	raphy		
					Bank A	and Aggreg	ate Loans E	By Year					
Geographic			2	020					2		Total		
Income Level	Ва	ank	Agg	Ban	ık	Agg	Ва	nk	Agg	Ban	k	Agg	Businesses %
	# #% #% \$(000)				\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	3	4.4	5.1	918	7.3	5.2	2	4.3	5.2	576	8.7	5.2	5.7
Moderate	5	7.4	14.0	240	1.9	13.4	3	6.4	14.2	153	2.3	13.8	15.7
Middle	27	39.7	34.6	5,033	39.9	37.1	20	42.6	34.4	2,097	31.8	36.1	35.2
Upper	33	48.5	45.6	6,420	50.9	43.6	22	46.8	45.5	3,767	57.1	44.6	43.4

Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.6	0	0.0	0.6	0	0.0	0.7	0	0.0	0.1	
Total	68	100.0	100.0	12,611	100.0	100.0	47	100.0	100.0	6,593	100.0	100.0	100.0

		Table 3	9 - Distrib	ution of 202		23 Small B			Income Le	evel of Geog	raphy		
					Bank A	And Aggreg	ate Loans I	By Year					
Geographic			2	.022					2	023			Total
Income Level	Ва	ank	Agg	Ban	k	Agg	Ва	ınk	Agg	Bar	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	1	8.3	3.4	19	1.4	3.9	0	0.0	3.4	0	0.0	3.3	4.0
Moderate	2	16.7	16.7	248	18.2	16.3	6	23.1	16.1	578	13.9	15.6	17.5
Middle	2	16.7	34.0	1,010	74.2	33.5	4	15.4	33.8	1,791	42.9	34.7	34.7
Upper	7	58.3	44.7	85	6.2	45.2	16	61.5	45.6	1,802	43.2	45.3	43.1
Unknown	0	0.0	0.7	0	0.0	1.0	0	0.0	0.6	0	0.0	0.9	0.8
Tract-Unk	0	0.0	0.5	0	0.0	0.2	0	0.0	0.4	0	0.0	0.1	
Total	12	100.0	100.0	1,362	100.0	100.0	26	100.0	100.0	4,171	100.0	100.0	100.0

		Table 40	- Distribu	tion of 2020	and 2021	Home M	ortgage Le	ending By	Income Le	evel of Geog	raphy		
					Asses	sment Are	ea: San Die	ego					
					Bank A	And Aggreg	ate Loans B	By Year					
Geographic			2	020	2021								Owner
Income Level	Ва	ınk	Agg	Ban	k	Agg	Ва	nk	Agg	Ban	k	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purch	ase Loans						
Low	11	17.7	3.3	3,925	13.1	2.4	2	2.9	3.5	369	0.9	2.5	2.8
Moderate	12	19.4	16.0	4,555	15.2	11.8	14	20.6	16.6	6,204	15.3	12.3	15.1

Middle	9	14.5	34.9	3,309	11.1	31.4	19	27.9	35.0	8,710	21.5	31.1	35.5
Upper	30	48.4	45.7	18,092	60.5	54.4	33	48.5	44.9	25,207	62.3	54.0	46.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	62	100.0	100.0	29,881	100.0	100.0	68	100.0	100.0	40,490	100.0	100.0	100.0
						Refinance	Loans						
Low	10	13.5	2.2	3,543	11.8	1.8	4	8.5	2.6	958	3.3	2.0	2.8
Moderate	30	40.5	12.5	10,588	35.3	10.1	17	36.2	13.7	5,771	20.2	10.6	15.1
Middle	10	13.5	34.0	4,783	15.9	31.1	6	12.8	33.9	2,218	7.7	30.3	35.5
Upper	24	32.4	51.3	11,080	36.9	57.1	20	42.6	49.7	19,683	68.7	57.1	46.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	74	100.0	100.0	29,994	100.0	100.0	47	100.0	100.0	28,630	100.0	100.0	100.0
					Hon	ne Improve	ment Loan	s					
Low	0	0.0	2.0	0	0.0	1.8	1	33.3	1.7	150	26.5	1.6	2.8
Moderate	0	0.0	10.1	0	0.0	8.1	0	0.0	9.7	0	0.0	8.4	15.1
Middle	0	0.0	31.2	0	0.0	28.8	1	33.3	31.9	302	53.4	27.0	35.5
Upper	1	100.0	56.7	1,439	100.0	61.3	1	33.3	56.7	114	20.1	63.0	46.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	1,439	100.0	100.0	3	100.0	100.0	566	100.0	100.0	100.0
						Multifam	ily Loans						Multi-family Units %
Low	0	0.0	24.1	0	0.0	19.5	0	0.0	23.1	0	0.0	12.2	13.0
Moderate	3	100.0	35.2	9,170	100.0	32.4	1	100.0	32.3	859	100.0	29.0	26.4
Middle	0	0.0	28.3	0	0.0	30.9	0	0.0	31.9	0	0.0	34.0	34.3
Upper	0	0.0	12.4	0	0.0	17.1	0	0.0	12.7	0	0.0	24.7	26.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	9,170	100.0	100.0	1	100.0	100.0	859	100.0	100.0	100.0

					Tot	al Home M	ortgage Lo	ans					Owner Occupied Units %	
Low	21	14.8	2.5	7,468	10.4	2.6	7	5.5	2.9	1,477	2.0	2.7	2.8	
Moderate 46 32.4 13.2 24,653 34.3 11.3 32 25.0 14.3 12,834 16.9 12.0														
Middle														
Upper	55	38.7	50.3	30,611	42.6	55.1	60	46.9	48.8	49,322	65.1	54.8	46.6	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
Total	142	100.0	100.0	71,824	100.0	100.0	128	100.0	100.0	75,740	100.0	100.0	100.0	

		Table 41 -	Distribu	tion of 2020	and 202	21 Home	Mortgage I	Lending B	y Income	Level of G	eography	,	
					Asse	essment A	Area: San D	iego					
					Bank A	nd Aggreg	ate Loans By	Year					
Geographic Income			20	20					20	21			Owner Occupied Units
Level	Baı	nk	Agg	Ban	k	Agg	Bar	nk	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	1
·						Other Pu	rpose LOC						
Low	0	0.0	1.4	0	0.0	1.1	0	0.0	1.1	0	0.0	0.6	2.8
Moderate	0	0.0	7.6	0	0.0	4.8	0	0.0	9.4	0	0.0	5.5	15.1
Middle	0	0.0	30.2	0	0.0	23.5	2	33.3	29.3	490	13.9	20.6	35.5
Upper	0	0.0	60.8	0	0.0	70.7	4	66.7	60.3	3,043	86.1	73.3	46.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	6	100.0	100.0	3,533	100.0	100.0	100.0
					Oth	er Purpose	Closed/Exe	mpt					
Low	0	0.0	2.1	0	0.0	0.9	0	0.0	2.1	0	0.0	0.9	2.8
Moderate	1	50.0	10.1	340	25.4	3.6	0	0.0	9.0	0	0.0	3.8	15.1
Middle	1	50.0	32.8	1,000	74.6	20.8	1	33.3	31.6	387	23.3	17.5	35.5
Upper	0	0.0	55.0	0	0.0	74.8	2	66.7	57.3	1,275	76.7	77.7	46.6

Rated Area: State of California

Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	1,340	100.0	100.0	3	100.0	100.0	1,662	100.0	100.0	100.0
		1			Р	urpose N	ot Applicable)	I.				
Low	0	0.0	4.7	0	0.0	3.0	0	0.0	4.2	0	0.0	3.3	2.8
Moderate	0	0.0	18.0	0	0.0	13.0	0	0.0	22.1	0	0.0	18.2	15.1
Middle	0	0.0	36.3	0	0.0	33.0	0	0.0	37.3	0	0.0	34.7	35.5
Upper	0	0.0	41.0	0	0.0	50.9	0	0.0	36.5	0	0.0	43.9	46.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 42	- Distribu	tion of 2022	and 2023	Home M	ortgage Le	ending By	Income Le	vel of Geog	raphy		
					Asses	sment Are	a: San Die	ego					
					Bank A	And Aggreg	ate Loans B	By Year					
Geographic			2	022					2	023			Owner
Income Level	Ва	ank	Agg	Ban	k	Agg	Ва	ınk	Agg	Ban	k	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	J
					H	ome Purch	ase Loans						
Low	4	4.5	2.6	1,535	2.2	1.8	3	3.2	2.9	1,622	2.9	1.9	2.4
Moderate	12	13.5	16.5	4,704	6.8	12.4	28	29.8	17.0	14,007	25.0	12.7	15.8
Middle	21	23.6	38.9	10,402	15.1	34.9	26	27.7	38.2	12,958	23.2	34.3	37.2
Upper	52	58.4	41.8	52,301	75.9	50.7	37	39.4	41.8	27,335	48.9	51.0	44.4
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	89	100.0	100.0	68,942	100.0	100.0	94	100.0	100.0	55,922	100.0	100.0	100.0

						Refinance	Loans						
Low	0	0.0	2.6	0	0.0	1.7	1	3.7	3.3	828	5.7	1.2	2.4
Moderate	3	10.3	16.4	964	3.8	12.2	8	29.6	17.8	2,934	20.1	20.5	15.8
Middle	8	27.6	37.5	4,625	18.3	32.4	8	29.6	35.5	3,239	22.1	28.1	37.2
Upper	18	62.1	43.4	19,618	77.8	53.5	10	37.0	43.0	7,628	52.1	49.9	44.4
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.4	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	29	100.0	100.0	25,207	100.0	100.0	27	100.0	100.0	14,629	100.0	100.0	100.0
					Hon	ne Improve	ment Loan	S					
Low	0	0.0	1.2	0	0.0	0.8	0	0.0	2.0	0	0.0	1.5	2.4
Moderate	1	9.1	10.9	187	3.7	7.8	1	14.3	14.3	126	5.4	10.6	15.8
Middle	4	36.4	36.4	1,431	28.7	29.5	1	14.3	36.3	119	5.1	29.8	37.2
Upper	6	54.5	51.3	3,370	67.6	61.7	5	71.4	47.1	2,082	89.5	58.0	44.4
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	4,988	100.0	100.0	7	100.0	100.0	2,327	100.0	100.0	100.0
						Multifam	ily Loans						Multi-family Units %
Low	0	0.0	13.5	0	0.0	8.2	0	0.0	14.2	0	0.0	3.9	10.1
Moderate	1	50.0	39.2	1,980	67.6	34.7	1	50.0	39.4	13,000	96.3	33.3	29.1
Middle	1	50.0	32.5	950	32.4	35.0	1	50.0	26.7	500	3.7	25.0	35.0
Upper	0	0.0	13.3	0	0.0	20.4	0	0.0	17.6	0	0.0	37.4	25.0
Unknown	0	0.0	1.5	0	0.0	1.8	0	0.0	2.1	0	0.0	0.4	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	2,930	100.0	100.0	2	100.0	100.0	13,500	100.0	100.0	100.0
					Tot	al Home M	ortgage Lo	ans					Owner Occupied Units %
Low	4	3.0	2.4	1,535	1.5	2.2	4	2.8	2.9	2,450	2.7	1.8	2.4
Moderate	18	13.4	15.6	7,924	7.7	13.6	42	29.6	16.6	31,357	34.7	15.8	15.8
Middle	36	26.9	37.6	17,785	17.3	33.3	39	27.5	36.9	17,041	18.8	31.2	37.2
Upper	76	56.7	44.1	75,289	73.4	50.6	57	40.1	43.4	39,580	43.8	51.1	44.4

Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	134	100.0	100.0	102,533	100.0	100.0	142	100.0	100.0	90,428	100.0	100.0	100.0

		Table 43 -	Distribu	tion of 2022	2 and 202	23 Home	Mortgage L	ending B	y Income	Level of G	eography	,	
					Asse	ssment A	Area: San Di	iego					
					Bank A	nd Aggreg	ate Loans By	Year					
Geographic Income			20	22					20	23			Owner Occupied Units
Level	Bar	nk	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	irpose LOC						
Low	0	0.0	1.0	0	0.0	0.5	0	0.0	2.3	0	0.0	1.0	2.4
Moderate	1	50.0	11.5	89	37.2	6.9	1	20.0	12.7	5	0.4	7.9	15.8
Middle	1	50.0	32.3	150	62.8	23.9	1	20.0	36.7	5	0.4	27.6	37.2
Upper	0	0.0	54.9	0	0.0	68.4	3	60.0	48.0	1,236	99.2	63.3	44.4
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	239	100.0	100.0	5	100.0	100.0	1,246	100.0	100.0	100.0
					Othe	er Purpose	Closed/Exe	mpt					
Low	0	0.0	1.4	0	0.0	0.4	0	0.0	1.6	0	0.0	0.6	2.4
Moderate	0	0.0	10.9	0	0.0	4.0	3	42.9	14.2	1,285	45.8	5.6	15.8
Middle	1	100.0	35.5	227	100.0	15.6	2	28.6	36.6	220	7.8	16.5	37.2
Upper	0	0.0	51.7	0	0.0	79.7	2	28.6	47.3	1,299	46.3	77.1	44.4
Unknown	0	0.0	0.5	0	0.0	0.3	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	227	100.0	100.0	7	100.0	100.0	2,804	100.0	100.0	100.0
					P	urpose N	ot Applicable	;					
Low	0	0.0	2.7	0	0.0	2.3	0	0.0	3.7	0	0.0	1.0	2.4
Moderate	0	0.0	23.1	0	0.0	17.6	0	0.0	19.9	0	0.0	8.2	15.8
Middle	0	0.0	39.0	0	0.0	38.7	0	0.0	20.6	0	0.0	10.5	37.2

Rated Area: State of California

Upper	0	0.0	35.2	0	0.0	41.3	0	0.0	55.3	0	0.0	80.1	44.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.5	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 44	- Distribut	ion of 2020	and 2021	. Small Bu	siness Ler	nding By R	Revenue S	ize of Busin	esses		
			P	Assessment	Area: San	Diego-Ca	rlsbad-Sa	n Marcos	CA MSA				
					Bank A	and Aggreg	ate Loans	By Year					
			2	020					2	021			Total
	Ва	ank	Agg	Bar	ık	Agg	Ва	ınk	Agg	Bar	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	8	11.8	41.2	83	0.7	24.7	7	14.9	46.5	560	8.5	25.2	92.8
Over \$1 Million	0	0.0		0	0.0		7	14.9		2,193	33.3		6.7
Revenue Unknown	60	88.2		12,528	99.3		33	70.2		3,840	58.2		0.5
Total	68	100.0		12,611	100.0		47	100.0		6,593	100.0		100.0
						By Loan	Size						
\$100,000 or Less	40	58.8	89.6	1,606	12.7	37.6	31	66.0	93.4	1,121	17.0	39.7	
\$100,001 - \$250,000	10	14.7	6.4	1,753	13.9	20.7	5	10.6	3.8	653	9.9	17.9	
\$250,001 - \$1 Million	18	26.5	4.1	9,252	73.4	41.7	11	23.4	2.8	4,819	73.1	42.3	
Total	68	100.0	100.0	12,611	100.0	100.0	47	100.0	100.0	6,593	100.0	100.0	
				Ву І	oan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	8	100.0		83	100.0		6	85.7		60	10.7		

\$100,001 - \$250,000	0	0.0	0	0.0	0	0.0	0	0.0		
\$250,001 - \$1 Million	0	0.0	0	0.0	1	14.3	500	89.3		
Total	8	100.0	83	100.0	7	100.0	560	100.0		

		Table 45	- Distribut	ion of 2022	and 2023	Small Bu	siness Ler	nding By R	evenue Si	ize of Busin	esses		
					Assessi	ment Area	a: San Die	go					
					Bank A	and Aggreg	ate Loans I	By Year					
			2	022					2	023			Total
	Ва	ank	Agg	Bar	nk 	Agg	Ва	ınk	Agg	Bar	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	9	75.0	52.2	1,095	80.4	31.3	10	38.5	54.7	1,214	29.1	31.6	92.9
Over \$1 Million	1	8.3		10	0.7		11	42.3		2,649	63.5		6.6
Revenue Unknown	2	16.7		257	18.9		5	19.2		308	7.4		0.5
Total	12	100.0		1,362	100.0		26	100.0		4,171	100.0		100.0
						By Loan	Size						
\$100,000 or Less	10	83.3	95.9	124	9.1	49.6	19	73.1	96.2	305	7.3	51.7	
\$100,001 - \$250,000	1	8.3	2.4	238	17.5	15.2	2	7.7	2.2	363	8.7	14.6	
\$250,001 - \$1 Million	1	8.3	1.7	1,000	73.4	35.2	5	19.2	1.6	3,503	84.0	33.7	
Total	12	100.0	100.0	1,362	100.0	100.0	26	100.0	100.0	4,171	100.0	100.0	
				Ву І	oan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	8	88.9		95	8.7		7	70.0		74	6.1		
\$100,001 - \$250,000	0	0.0		0	0.0		2	20.0		363	29.9		
\$250,001 - \$1 Million	1	11.1		1,000	91.3		1	10.0		777	64.0		
Total	9	100.0		1,095	100.0		10	100.0		1,214	100.0		

Rated Area: State of California

Table 46 - Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: San Diego Bank And Aggregate Loans By Year Families by 2020 2021 **Borrower Family** Income Level Bank Agg Bank Bank **Bank** Agg Agg Agg Income % # #% #% \$(000) \$% \$% #% #% \$(000) \$% \$% **Home Purchase Loans** 430 0.5 Low 1 1.6 1.3 178 0.6 0.6 2.9 1.1 1.1 23.6 Moderate 10 16.1 8.8 2,814 9.4 5.0 4 5.9 7.2 1,056 2.6 3.8 16.9 Middle 9 14.5 23.2 3,795 12.7 18.1 3 4.4 19.5 1,432 3.5 14.5 17.8 Upper 2 3.2 56.7 1,337 4.5 66.4 6 8.8 57.5 5,464 13.5 67.0 41.7 Unknown 40 64.5 10.0 21,757 72.8 9.8 53 77.9 14.7 32,108 79.3 14.2 0.0 62 100.0 100.0 29,881 100.0 68 100.0 100.0 100.0 100.0 Total 100.0 100.0 40,490 **Refinance Loans** 5.4 2.5 3.7 1.5 8.5 3.7 908 3.2 2.3 23.6 Low 4 1,111 4 7 Moderate 12 16.2 8.7 3,308 11.0 5.7 14.9 10.3 2,085 7.3 6.6 16.9 Middle 21 28.4 18.5 7,511 25.0 15.3 7 14.9 18.6 2,507 8.8 15.1 17.8 47.7 5,898 9 8,415 41.7 Upper 13 17.6 19.7 53.4 19.1 46.7 29.4 54.4 20 Unknown 24 32.4 22.5 12,166 40.6 24.1 42.6 20.7 14,715 51.4 21.7 0.0 Total 74 100.0 100.0 29,994 100.0 100.0 100.0 100.0 28,630 100.0 100.0 100.0 **Home Improvement Loans** Low 0 0.0 2.9 0 0.0 1.9 0.0 3.0 0 0.0 2.6 23.6 Moderate 0 0.0 8.1 0 0.0 6.1 1 33.3 6.7 302 53.4 4.7 16.9 Middle 0 0 0.0 12.1 17.8 0.0 18.8 0 0.0 17.4 0.0 15.9 0 Upper 0 0.0 65.1 0.0 65.0 0 0.0 70.3 0 0.0 74.5 41.7 100.0 5.2 100.0 9.6 2 66.7 46.6 6.2 0.0 Unknown 1 1,439 4.1 264 1 100.0 100.0 100.0 100.0 3 100.0 100.0 100.0 100.0 100.0 Total 1,439 566 **Total Home Mortgage Loans** 5 2.3 1,289 2.1 6 1,338 Low 3.6 1.3 4.7 3.1 1.8 1.8 23.6

12

9.4

9.5

3.443

4.6

5.7

16.9

5.5

16.5

8.6

6.462

10.3

23

Moderate

Middle	30	21.6	19.2	11,306	18.0	15.8	10	7.9	18.6	3,939	5.3	14.7	17.8
Upper	15	10.8	49.8	7,235	11.5	56.4	15	11.8	50.1	13,879	18.5	58.5	41.7
Unknown	66	47.5	20.0	36,362	58.0	20.9	84	66.1	18.7	52,282	69.8	19.3	0.0
Total	139	100.0	100.0	62,654	100.0	100.0	127	100.0	100.0	74,881	100.0	100.0	100.0

		Table 47	7 - Distrib	ution of 20	20 and 20)21 Home	Mortgage	Lending E	By Borrov	ver Income	Level		
					Asses	ssment A	rea: San Die	ego					
					Bank A	nd Aggreg	ate Loans By	Year					
Borrower Income			2020						20	21			Families by Family
Level	Bar	nk	Agg	Ban	k	Agg	Bar	ık	Agg	Bar	ık	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pur	pose LOC						
Low	0	0.0	3.7	0	0.0	3.8	0	0.0	2.5	0	0.0	3.4	23.6
Moderate	0	0.0	7.1	0	0.0	4.3	0	0.0	7.0	0	0.0	3.7	16.9
Middle	0	0.0	17.2	0	0.0	11.7	0	0.0	15.6	0	0.0	8.8	17.8
Upper	0	0.0	69.8	0	0.0	77.0	0	0.0	70.7	0	0.0	79.5	41.7
Unknown	0	0.0	2.3	0	0.0	3.3	6	100.0	4.2	3,533	100.0	4.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	6	100.0	100.0	3,533	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exen	npt					
Low	0	0.0	4.9	0	0.0	2.4	0	0.0	5.1	0	0.0	2.8	23.6
Moderate	1	50.0	9.6	340	25.4	3.6	0	0.0	8.6	0	0.0	3.8	16.9
Middle	0	0.0	19.9	0	0.0	8.1	0	0.0	13.4	0	0.0	6.2	17.8
Upper	0	0.0	58.6	0	0.0	69.6	0	0.0	63.6	0	0.0	67.7	41.7
Unknown	1	50.0	7.0	1,000	74.6	16.3	3	100.0	9.3	1,662	100.0	19.5	0.0
Total	2	100.0	100.0	1,340	100.0	100.0	3	100.0	100.0	1,662	100.0	100.0	100.0
					Pı	urpose No	t Applicable						
Low	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	23.6
Moderate	0	0.0	0.5	0	0.0	0.3	0	0.0	1.2	0	0.0	0.5	16.9
Middle	0	0.0	0.6	0	0.0	0.5	0	0.0	1.0	0	0.0	0.7	17.8
Upper	0	0.0	0.8	0	0.0	1.5	0	0.0	1.5	0	0.0	2.1	41.7

Rated Area: State of California

Unknown	0	0.0	97.9	0	0.0	97.6	0	0.0	96.1	0	0.0	96.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table	48 - Distri	ibution of 20				_	y Borrowe	r Income Lev	/el		
					Asses	sment Are	a: San Die	ego					
					Bank A	And Aggreg	ate Loans E	By Year					
Borrower			2022						2	023			Families by Family
Income Level	Ва	nk	Agg	Bar	ık	Agg	Ва	nk	Agg	Ban	ık	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					н	ome Purch	ase Loans						
Low	0	0.0	0.9	0	0.0	0.4	3	3.2	0.9	632	1.1	0.4	22.8
Moderate	0	0.0	6.1	0	0.0	3.0	14	14.9	4.9	5,203	9.3	2.1	17.3
Middle	1	1.1	17.6	436	0.6	12.4	19	20.2	15.8	11,069	19.8	10.6	18.7
Upper	5	5.6	60.4	4,841	7.0	69.2	9	9.6	54.5	8,403	15.0	61.1	41.2
Unknown	83	93.3	14.9	63,665	92.3	15.0	49	52.1	24.0	30,615	54.7	25.8	0.0
Total	89	100.0	100.0	68,942	100.0	100.0	94	100.0	100.0	55,922	100.0	100.0	100.0
						Refinance	Loans						
Low	3	10.3	8.8	654	2.6	5.9	2	7.4	6.7	460	3.1	2.5	22.8
Moderate	2	6.9	12.9	663	2.6	8.1	6	22.2	9.4	1,639	11.2	2.7	17.3
Middle	0	0.0	20.3	0	0.0	16.0	2	7.4	16.8	620	4.2	6.1	18.7
Upper	8	27.6	43.9	7,556	30.0	54.4	4	14.8	38.1	4,521	30.9	21.0	41.2
Unknown	16	55.2	14.2	16,334	64.8	15.6	13	48.1	29.0	7,389	50.5	67.7	0.0
Total	29	100.0	100.0	25,207	100.0	100.0	27	100.0	100.0	14,629	100.0	100.0	100.0
	•		•	•	Hor	ne Improve	ment Loan	s	•	•	•	•	<u> </u>
Low	0	0.0	2.8	0	0.0	2.6	2	28.6	3.0	245	10.5	1.7	22.8
Moderate	0	0.0	7.9	0	0.0	4.6	0	0.0	10.1	0	0.0	5.5	17.3
Middle	0	0.0	20.8	0	0.0	13.8	0	0.0	21.8	0	0.0	14.9	18.7

Upper	0	0.0	64.1	0	0.0	73.5	1	14.3	54.0	500	21.5	63.4	41.2
Unknown	11	100.0	4.5	4,988	100.0	5.5	4	57.1	11.0	1,582	68.0	14.5	0.0
Total	11	100.0	100.0	4,988	100.0	100.0	7	100.0	100.0	2,327	100.0	100.0	100.0
					Tota	l Home Mo	rtgage Loar	ns					
Low	4	3.0	4.4	743	0.7	2.6	7	5.0	2.6	1,337	1.7	1.1	22.8
Moderate	2	1.5	9.0	663	0.7	4.9	25	17.9	6.9	7,602	9.9	2.4	17.3
Middle	1	0.8	18.9	436	0.4	13.5	24	17.1	17.0	12,544	16.3	9.3	18.7
Upper	13	9.8	54.5	12,397	12.4	64.0	14	10.0	49.6	13,424	17.5	49.1	41.2
Unknown	112	84.8	13.2	85,364	85.7	14.9	70	50.0	23.9	42,021	54.6	38.1	0.0
Total	132	100.0	100.0	99,603	100.0	100.0	140	100.0	100.0	76,928	100.0	100.0	100.0

		Table 49	9 - Distrib	ution of 202	22 and 20)23 Home	Mortgage	Lending I	By Borrov	ver Income	Level				
					Asses	sment A	rea: San Die	ego							
					Bank A	nd Aggreg	ate Loans By	Year							
Borrower Income			2022						20	23			Families by Family		
Level	Bar	ık	Agg	Ban	k	Agg	Bar	nk	Agg	Ban	ık	Agg	Income %		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%			
						Other Pur	pose LOC								
Low															
Moderate	0	0.0	6.5	0	0.0	2.9	1	20.0	7.3	5	0.4	3.0	17.3		
Middle	0	0.0	15.9	0	0.0	8.7	1	20.0	19.0	5	0.4	10.7	18.7		
Upper	0	0.0	63.5	0	0.0	75.2	0	0.0	49.3	0	0.0	56.0	41.2		
Unknown	1	50.0	10.6	150	62.8	8.7	3	60.0	20.8	1,236	99.2	26.5	0.0		
Total	2	100.0	100.0	239	100.0	100.0	5	100.0	100.0	1,246	100.0	100.0	100.0		
					Othe	r Purpose	Closed/Exem	npt							
Low	0	0.0	4.1	0	0.0	2.3	0	0.0	4.1	0	0.0	1.2	22.8		
Moderate	0	0.0	9.9	0	0.0	3.3	4	57.1	11.8	755	26.9	3.4	17.3		
Middle	0	0.0	17.4	0	0.0	5.5	2	28.6	23.4	850	30.3	6.3	18.7		
Upper	0	0.0	59.0	0	0.0	69.7	0	0.0	45.8	0	0.0	49.3	41.2		
Unknown	1	100.0	9.7	227	100.0	19.3	1	14.3	15.0	1,199	42.8	39.8	0.0		
Total	1	100.0	100.0	227	100.0	100.0	7	100.0	100.0	2,804	100.0	100.0	100.0		

Rated Area: State of California

					Pı	urpose No	t Applicable								
Low	0	0.0	1.1	0	0.0	0.3	0	0.0	0.0	0	0.0	0.0	22.8		
Moderate															
Middle															
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	41.2		
Unknown	0	0.0	97.3	0	0.0	98.8	0	0.0	99.7	0	0.0	99.9	0.0		
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0		

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

			Table 50 –	Qualified Inves	tments				
			Assessment	Area: State of	California				
Assessment Areas	Prior Period	Investments	Current Perio	d Investments	Т	otal Investment	s	Unfunded Co	ommitments
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
Full Scope									
Southern California	41	142,987	307	193,880	328	336,867	36.8	-	-
Bay Area	22	132,379	124	64,081	146	196,459	21.5	-	-
Statewide/Regional	34	62,687	23	209,888	57	272,575	29.8	-	-
Limited Scope						<u>'</u>	<u>'</u>		
Sacramento	11	17,886	20	10,840	21	28,725	3.1	-	-
San Diego	11	60,203	15	19,903	26	80,106	8.8	-	-

		Tabl	e 51 – Disti	ributio	n of Bra	anch D	elivery	System and	d Branch O	penin	gs/Clos	sings					
	Deposits		ı	Branche	es				Branch Ope	enings	/ Closin	ngs			Pop	ulation	
Assessment Areas	% of Rated Area	# of Bank Branches	% of Rated Area		ation of Inco el of Ge	ome	•	# of Branch	# of Branch		hange Branche			% of I		olds wit	thin each
	Deposits in AA	branches	Branches in AA	Low	Mod	Mid	Upp	Openings	Closings	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope																	
Southern California ¹	87.2	46	65.7	4.3	28.3	28.3	37.0	0	4	0	1	3	0	4.9	26.5	31.1	36.4
Bay Area	12.0	22	31.4	27.3	4.5	54.5	13.6	0	3	2	0	0	1	6.9	20.2	36.8	34.0
Limited Scope																	
Sacramento	0.4	1	1.4	0	0	0	100	0	0	0	0	0	0	10.2	28.6	36.5	24.3
San Diego	0.4	1	1.4	0	0	0	100	0	0	0	0	0	0	5.8	23.0	36.0	34.7

¹ One branch was located in a census tract with income data level unknown.

Rated Area: State of New York

Table 52 – Lending Volume of Reported Loans Retail Lending Evaluation Period: January 1, 2020 to December 31, 2023 Community Development Lending Evaluation Period: January 1, 2021 to August 12, 2024 Assessment Area: New York

Assessment Areas	% of Rated	Small Bu	ısiness Loans	Small F	arm Loans	All HN	/IDA Loans		ommunity opment Loans	Total R	eported Loans	% of Rated
	Area Loans	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	Deposits
Full Scope												
New York	100	5,754	134,705	0	0	8,472	4,316,700	92	635,776	14,318	5,087,181	99.1
Statewide/Regional								5	46,498			

		Table 5	3 - Distrib	ution of 202	20 and 202	21 Small B	usiness Le	ending By	Income Le	vel of Geog	raphy		
					Asses	ssment Ar	ea: New Y	ork (
					Bank A	And Aggreg	ate Loans I	By Year					
Geographic			2	020					2	021			Total
Income Level	Ва	nk	Agg	Ban	ık	Agg	Ва	ınk	Agg	Ban	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	288	25.7	8.6	5,381	11.0	6.8	183	27.6	9.1	4,027	8.2	7.3	8.2
Moderate	466	41.6	19.6	11,528	23.5	15.4	240	36.1	21.9	15,222	30.8	16.9	19.7
Middle	169	15.1	19.9	4,062	8.3	15.6	79	11.9	22.4	5,818	11.8	17.6	19.9
Upper	166	14.8	48.8	23,536	47.9	56.9	137	20.6	44.0	20,734	42.0	53.3	49.1
Unknown	30	2.7	2.8	4,589	9.3	5.3	25	3.8	2.5	3,575	7.2	4.8	3.0
Tract-Unk	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	
Total	1,119	100.0	100.0	49,096	100.0	100.0	664	100.0	100.0	49,376	100.0	100.0	100.0

		Table 5	4 - Distrib	ution of 202					Income Le	evel of Geog	raphy		
					Asses	ssment Ar	ea: New Y	ork					
					Bank A	and Aggreg	ate Loans E	By Year					
Geographic			2	022					2	023			Total
Income Level	Ва	nk	Agg	Ban	k	Agg	Ва	nk	Agg	Ban	k	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	895	28.3	9.3	6,721	24.6	9.1	229	28.2	10.0	953	10.7	9.3	8.2
Moderate	1,391	44.0	20.4	12,076	44.2	18.2	319	39.3	21.1	4,382	49.1	18.6	17.8
Middle	715	22.6	24.6	6,489	23.8	19.9	191	23.5	24.6	1,583	17.7	20.3	22.0
Upper	128	4.1	40.9	1,801	6.6	45.0	65	8.0	39.8	1,911	21.4	43.9	46.1
Unknown	30	0.9	4.8	218	0.8	7.8	8	1.0	4.4	99	1.1	7.8	5.9
Tract-Unk	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	
Total	3,159	100.0	100.0	27,305	100.0	100.0	812	100.0	100.0	8,928	100.0	100.0	100.0

		Table 5	5 - Distrib	ution of 2020					y Income I	Level of Geogr	aphy		
							ea: New Y						
Geographic			:	2020						2021			Owner
Income Level	Ва	nk	Agg	Banl	k	Agg	Ва	ınk	Agg	Bank		Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	33 75
					H	ome Purch	nase Loans						
Low	89	8.3	4.1	50,017	8.7	3.7	131	7.6	4.0	69,637	7.8	3.6	3.6
Moderate	287	26.7	16.1	154,102	26.8	14.3	407	23.7	16.2	199,875	22.5	14.0	16.6
Middle	347	32.3	29.5	176,747	30.7	24.8	569	33.1	26.9	281,355	31.7	22.1	32.5
Upper	351	32.7	50.1	194,757	33.8	57.0	609	35.4	52.6	336,120	37.9	60.2	47.2
Unknown	0	0.0	0.2	0	0.0	0.2	2	0.1	0.2	804	0.1	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

Total	1,074	100.0	100.0	575,623	100.0	100.0	1,718	100.0	100.0	887,791	100.0	100.0	100.0
						Refinanc	e Loans				I	l .	L
Low	32	6.5	4.5	15,309	6.2	4.4	49	6.3	4.8	27,619	7.4	5.1	3.6
Moderate	138	28.0	15.6	72,927	29.7	13.9	203	25.9	17.3	104,078	27.8	16.4	16.6
Middle	190	38.6	28.8	92,956	37.9	22.8	327	41.8	30.1	155,855	41.6	25.2	32.5
Upper	132	26.8	50.9	64,003	26.1	58.6	203	25.9	47.6	86,491	23.1	53.1	47.2
Unknown	0	0.0	0.2	0	0.0	0.2	1	0.1	0.2	390	0.1	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	492	100.0	100.0	245,195	100.0	100.0	783	100.0	100.0	374,433	100.0	100.0	100.0
					Hor	ne Improv	ement Loa	ns					
Low	0	0.0	3.6	0	0.0	2.8	7	18.9	4.5	2,750	16.5	4.8	3.6
Moderate	3	23.1	15.2	1,720	24.0	14.1	5	13.5	16.0	2,635	15.8	16.5	16.6
Middle	6	46.2	29.7	2,859	40.0	26.8	10	27.0	29.6	3,452	20.7	25.5	32.5
Upper	4	30.8	51.4	2,576	36.0	56.2	15	40.5	49.8	7,875	47.1	53.2	47.2
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	7,155	100.0	100.0	37	100.0	100.0	16,712	100.0	100.0	100.0
						Multifar	nily Loans						Multi-family Units %
Low	0	0.0	15.9	0	0.0	13.0	1	11.1	16.0	1,069	9.9	17.5	19.9
Moderate	6	85.7	33.9	4,235	92.4	27.7	7	77.8	34.7	8,922	82.8	33.9	27.1
Middle	1	14.3	16.8	350	7.6	13.7	1	11.1	17.7	780	7.2	17.6	17.0
Upper	0	0.0	33.0	0	0.0	45.1	0	0.0	31.5	0	0.0	31.0	35.6
Unknown	0	0.0	0.4	0	0.0	0.4	0	0.0	0.1	0	0.0	0.1	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	4,585	100.0	100.0	9	100.0	100.0	10,771	100.0	100.0	100.0
					To	tal Home N	∕lortgage Lo	oans					Owner Occupied Units %
Low	127	7.6	4.8	67,344	7.7	6.5	202	7.5	4.8	108,280	8.0	7.2	3.6

Moderate	462	27.7	16.6	246,945	28.4	17.8	667	24.7	17.3	337,072	24.8	19.1	16.6
Middle	571	34.3	29.1	284,654	32.8	21.0	960	35.6	28.4	466,429	34.3	22.1	32.5
Upper	505	30.3	49.4	270,081	31.1	54.5	865	32.1	49.3	446,618	32.8	51.5	47.2
Unknown	0	0.0	0.2	0	0.0	0.3	3	0.1	0.2	1,194	0.1	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1,665	100.0	100.0	869,024	100.0	100.0	2,697	100.0	100.0	1,359,593	100.0	100.0	100.0

		Table 56 -	Distribut	tion of 2020	and 202	1 Home I	Mortgage Le	ending By	Income	Level of Ge	ography		
					Asse	ssment A	rea: New Y	ork					
					Bank A	nd Aggreg	ate Loans By	Year					
Geographic			20	20					20	21			Owner Occupied
Income Level	Bar	nk	Agg	Ban	k	Agg	Ban	ık	Agg	Ban	ık	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	rpose LOC						
Low	2	8.7	3.6	668	6.4	3.5	1	2.4	4.0	475	2.2	3.8	3.6
Moderate	8	34.8	15.9	4,750	45.2	15.9	15	35.7	16.0	5,977	28.2	15.4	16.6
Middle	9	39.1	27.7	4,266	40.6	23.8	13	31.0	28.7	7,424	35.0	24.3	32.5
Upper	4	17.4	52.7	823	7.8	56.4	13	31.0	51.1	7,309	34.5	56.4	47.2
Unknown	0	0.0	0.1	0	0.0	0.4	0	0.0	0.1	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	10,507	100.0	100.0	42	100.0	100.0	21,185	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exen	npt					
Low	4	7.1	3.6	1,350	5.2	1.7	13	12.0	4.5	6,730	13.8	2.4	3.6
Moderate	20	35.7	15.4	9,211	35.5	6.7	30	27.8	14.2	15,585	32.0	6.6	16.6
Middle	18	32.1	21.8	7,476	28.8	8.7	40	37.0	21.1	17,563	36.1	7.7	32.5
Upper	14	25.0	58.9	7,922	30.5	82.8	25	23.1	60.1	8,823	18.1	83.2	47.2
Unknown	0	0.0	0.3	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	56	100.0	100.0	25,959	100.0	100.0	108	100.0	100.0	48,701	100.0	100.0	100.0
					Р	urpose No	t Applicable						
Low	0	0.0	6.9	0	0.0	6.9	0	0.0	7.2	0	0.0	12.6	3.6

Rated Area: State of New York

Moderate	0	0.0	22.4	0	0.0	22.7	0	0.0	20.4	0	0.0	20.9	16.6
Middle	0	0.0	43.0	0	0.0	40.3	0	0.0	43.2	0	0.0	39.7	32.5
Upper	0	0.0	27.6	0	0.0	29.9	0	0.0	29.2	0	0.0	26.8	47.2
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 5	7 - Distrib	ution of 2022	and 2023	Home Mo	rtgage Le	nding By	Income Le	vel of Geogr	aphy		
					Assess	ment Are	a: New Yo	ork					
					Bank Aı	nd Aggrega	ite Loans B	y Year					
Geographic				2022					7	2023			Owner
Income Level	Ва	ınk	Agg	Bank		Agg	Ва	ınk	Agg	Ban	k	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	J 75
					Но	me Purcha	se Loans						
Low	208	9.9	4.0	96,675	8.8	3.4	104	7.3	4.1	47,702	7.4	3.3	3.6
Moderate	571	27.3	16.2	287,082	26.3	13.1	370	26.1	16.6	171,312	26.5	13.1	17.1
Middle	730	34.9	31.9	357,715	32.7	25.0	503	35.5	31.1	214,701	33.2	23.3	36.4
Upper	576	27.5	46.9	346,786	31.7	57.5	438	30.9	47.3	210,016	32.5	59.3	42.2
Unknown	7	0.3	1.0	4,710	0.4	1.1	3	0.2	0.9	2,795	0.4	1.0	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2,092	100.0	100.0	1,092,968	100.0	100.0	1,418	100.0	100.0	646,526	100.0	100.0	100.0
						Refinance	Loans						
Low	19	6.8	4.6	10,087	6.6	4.3	2	2.9	4.9	947	2.1	4.5	3.6
Moderate	83	29.6	17.7	48,889	32.1	14.8	26	37.7	18.2	21,454	47.4	13.4	17.1
Middle	104	37.1	35.0	53,578	35.1	25.2	30	43.5	30.6	15,979	35.3	18.4	36.4
Upper	74	26.4	41.8	39,914	26.2	54.8	11	15.9	45.4	6,924	15.3	63.0	42.2
Unknown	0	0.0	0.9	0	0.0	0.9	0	0.0	0.9	0	0.0	0.8	0.7

							п			ı			1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	280	100.0	100.0	152,468	100.0	100.0	69	100.0	100.0	45,304	100.0	100.0	100.0
					Home	e Improver	nent Loans	i					
Low	4	11.4	3.1	1,879	11.0	3.4	5	12.8	3.7	2,238	13.0	4.4	3.6
Moderate	11	31.4	15.8	5,199	30.4	15.3	10	25.6	16.6	5,250	30.6	16.0	17.1
Middle	11	31.4	35.8	5,500	32.2	29.7	13	33.3	36.8	4,731	27.6	26.5	36.4
Upper	9	25.7	44.6	4,525	26.5	50.9	11	28.2	42.1	4,947	28.8	52.2	42.2
Unknown	0	0.0	0.7	0	0.0	0.7	0	0.0	0.7	0	0.0	0.9	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	35	100.0	100.0	17,103	100.0	100.0	39	100.0	100.0	17,166	100.0	100.0	100.0
						Multifami	ly Loans						Multi-family Units %
Low	0	0.0	14.3	0	0.0	12.5	0	0.0	15.7	0	0.0	20.5	19.9
Moderate	5	33.3	27.5	8,245	19.3	26.0	5	71.4	28.1	9,732	76.1	23.3	24.6
Middle	4	26.7	21.9	8,022	18.7	18.6	2	28.6	22.4	3,060	23.9	19.8	19.1
Upper	6	40.0	34.3	26,520	62.0	41.1	0	0.0	32.2	0	0.0	35.2	34.9
Unknown	0	0.0	2.0	0	0.0	1.7	0	0.0	1.5	0	0.0	1.2	1.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	42,787	100.0	100.0	7	100.0	100.0	12,792	100.0	100.0	100.0
					Tota	l Home Mo	ortgage Loa	ans					Owner Occupied Units %
Low	233	9.4	4.6	110,221	8.2	6.3	115	7.1	4.5	51,677	6.9	7.3	3.6
Moderate	689	27.7	17.0	359,885	26.9	17.1	432	26.6	16.8	213,587	28.6	14.8	17.1
Middle	875	35.2	32.4	435,142	32.5	22.5	592	36.5	30.2	249,032	33.3	20.5	36.4
Upper	682	27.4	45.0	430,083	32.1	52.8	482	29.7	47.6	230,951	30.9	56.4	42.2
Unknown	7	0.3	1.0	4,710	0.4	1.2	3	0.2	0.9	2,795	0.4	1.0	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2,486	100.0	100.0	1,340,041	100.0	100.0	1,624	100.0	100.0	748,042	100.0	100.0	100.0

	7	able 58 -	Distribut	tion of 2022	and 202	3 Home N	Mortgage L	ending B	y Income	Level of Ge	ography		
					Asse	ssment A	rea: New \	ork/					
					Bank Ar	nd Aggrega	ate Loans By	y Year					
Geographic			20	22					20)23			Owner Occupied
Income Level	Ban	ık	Agg	Ban	ık	Agg	Bai	nk	Agg	Ban	k	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	T	T	ı		T	Other Pu	pose LOC		ı	T	ı	1 1	
Low	1	4.0	4.0	1,300	10.3	3.7	3	5.1	3.1	30	0.3	2.4	3.6
Moderate	7	28.0	13.4	3,687	29.1	11.2	13	22.0	14.6	2,334	23.4	10.8	17.1
Middle	9	36.0	34.8	3,372	26.6	25.4	26	44.1	32.3	2,177	21.9	20.5	36.4
Upper	8	32.0	46.9	4,321	34.1	58.6	17	28.8	49.4	5,418	54.4	65.8	42.2
Unknown	0	0.0	0.9	0	0.0	1.1	0	0.0	0.7	0	0.0	0.4	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	25	100.0	100.0	12,680	100.0	100.0	59	100.0	100.0	9,959	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exe	mpt					
Low	1	2.6	3.1	280	1.3	1.3	1	3.1	3.5	760	4.7	2.1	3.6
Moderate	12	30.8	11.2	6,783	30.8	4.1	8	25.0	11.9	3,505	21.5	4.5	17.1
Middle	17	43.6	22.7	6,955	31.6	7.2	18	56.3	26.0	8,384	51.5	7.1	36.4
Upper	9	23.1	62.3	8,017	36.4	87.1	5	15.6	57.9	3,646	22.4	86.1	42.2
Unknown	0	0.0	0.8	0	0.0	0.4	0	0.0	0.8	0	0.0	0.2	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	39	100.0	100.0	22,035	100.0	100.0	32	100.0	100.0	16,295	100.0	100.0	100.0
					P	urpose No	t Applicable	2					
Low	0	0.0	4.1	0	0.0	2.1	0	0.0	3.4	0	0.0	2.0	3.6
Moderate	0	0.0	22.1	0	0.0	11.9	0	0.0	10.3	0	0.0	4.7	17.1
Middle	0	0.0	45.4	0	0.0	22.3	0	0.0	16.1	0	0.0	6.4	36.4
Upper	0	0.0	27.4	0	0.0	62.7	0	0.0	69.0	0	0.0	85.9	42.2
Unknown	0	0.0	1.0	0	0.0	0.9	0	0.0	1.1	0	0.0	1.0	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

Rated Area: State of New York

Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0	1
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Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 59	- Distribut	ion of 2020	and 2021	Small Bu	siness Ler	nding By R	evenue Si	ize of Busin	esses		
					Assess	ment Are	a: New Yo	ork					
					Bank A	nd Aggreg	ate Loans I	By Year					
			2	020					2	021			Total
	Ва	ınk	Agg	Ban	ık	Agg	Ва	nk	Agg	Ban	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	777	69.4	34.0	7,634	15.5	17.4	382	57.5	35.3	9,219	18.7	17.1	90.4
Over \$1 Million	10	0.9		3,160	6.4		54	8.1		17,177	34.8		8.8
Revenue Unknown	332	29.7		38,302	78.0		228	34.3		22,980	46.5		0.7
Total	1,119	100.0		49,096	100.0		664	100.0		49,376	100.0		100.0
						By Loan	Size						
\$100,000 or Less	1,001	89.5	88.8	11,696	23.8	34.3	547	82.4	92.6	7,569	15.3	39.8	
\$100,001 - \$250,000	59	5.3	6.7	8,894	18.1	21.6	55	8.3	4.4	8,588	17.4	19.2	
\$250,001 - \$1 Million	59	5.3	4.4	28,506	58.1	44.0	62	9.3	3.0	33,219	67.3	41.0	
Total	1,119	100.0	100.0	49,096	100.0	100.0	664	100.0	100.0	49,376	100.0	100.0	
				By L	oan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	770	99.1		3,807	49.9		368	96.3		1,879	20.4		
\$100,001 - \$250,000	1	0.1		218	2.9		2	0.5		370	4.0		
\$250,001 - \$1 Million	6	0.8		3,609	47.3		12	3.1		6,970	75.6		
Total	777	100.0		7,634	100.0		382	100.0		9,219	100.0		

		Table 60	- Distribut	ion of 2022		Small Bu			Revenue S	ize of Busin	esses		
					Bank A	and Aggreg	ate Loans	By Year					
			2	022				•	2	023			Total
	Ва	ınk	Agg	Bar	nk	Agg	Ва	ank	Agg	Baı	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	3,143	99.5	49.2	21,420	78.4	31.7	794	97.8	53.6	7,165	80.3	33.1	90.7
Over \$1 Million	10	0.3		1,625	6.0		10	1.2		1,193	13.4		8.6
Revenue Unknown	6	0.2		4,260	15.6		8	1.0		570	6.4		0.8
Total	3,159	100.0		27,305	100.0		812	100.0		8,928	100.0		100.0
	.1	.1		1	.1	By Loan	Size	1.	ı				11
\$100,000 or Less	3,144	99.5	95.7	17,311	63.4	50.7	801	98.6	96.1	3,104	34.8	53.7	
\$100,001 - \$250,000	3	0.1	2.7	600	2.2	16.6	2	0.2	2.5	379	4.2	17.0	
\$250,001 - \$1 Million	12	0.4	1.6	9,394	34.4	32.6	9	1.1	1.3	5,445	61.0	29.3	
Total	3,159	100.0	100.0	27,305	100.0	100.0	812	100.0	100.0	8,928	100.0	100.0	
			•	By I	oan Size a	nd Revenu	es \$1 Millio	on or Less			•		
\$100,000 or Less	3,136	99.8		17,176	80.2		787	99.1		2,901	40.5		
\$100,001 - \$250,000	2	0.1		390	1.8		1	0.1		169	2.4		
\$250,001 - \$1 Million	5	0.2		3,854	18.0		6	0.8		4,095	57.2		
Total	3,143	100.0		21,420	100.0		794	100.0		7,165	100.0		

		Tabl	e 61 - Dist	ribution of 20				_	By Borrow	er Income Lev	el		
					Asses	ssment Ar	ea: New Y	ork					
					Bank	And Aggre	gate Loans	By Year					Familias b
Borrower			2020			T				2021		1	Families by Family
Income Level		nk	Agg	Ban	1	Agg		ınk	Agg	Banl	1	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
		1	ı		Н	lome Purch	ase Loans	1	1	Ī		1	П
Low	0	0.0	1.1	0	0.0	0.7	1	0.1	1.1	258	0.0	0.6	30.6
Moderate	6	0.6	6.7	1,975	0.3	3.0	11	0.6	6.9	4,092	0.5	3.0	15.8
Middle	0	0.0	18.8	0	0.0	11.7	3	0.2	18.0	1,478	0.2	10.8	15.7
Upper	0	0.0	60.3	0	0.0	69.7	3	0.2	61.2	2,837	0.3	71.8	37.9
Unknown	1,068	99.4	13.1	573,648	99.7	14.9	1,700	99.0	12.9	879,126	99.0	13.8	0.0
Total	1,074	100.0	100.0	575,623	100.0	100.0	1,718	100.0	100.0	887,791	100.0	100.0	100.0
						Refinance	Loans						
Low	1	0.2	1.6	250	0.1	1.1	10	1.3	1.9	1,936	0.5	1.3	30.6
Moderate	3	0.6	5.8	945	0.4	2.9	22	2.8	7.3	5,968	1.6	3.9	15.8
Middle	2	0.4	18.0	880	0.4	11.3	2	0.3	19.5	523	0.1	13.2	15.7
Upper	9	1.8	64.6	4,359	1.8	70.9	0	0.0	60.2	0	0.0	67.9	37.9
Unknown	477	97.0	10.0	238,761	97.4	13.8	749	95.7	11.1	366,006	97.7	13.8	0.0
Total	492	100.0	100.0	245,195	100.0	100.0	783	100.0	100.0	374,433	100.0	100.0	100.0
					Hor	me Improve	ement Loar	ns					
Low	0	0.0	1.9	0	0.0	1.0	0	0.0	2.4	0	0.0	1.2	30.6
Moderate	0	0.0	6.0	0	0.0	3.1	0	0.0	7.4	0	0.0	3.8	15.8
Middle	0	0.0	16.2	0	0.0	10.0	0	0.0	16.5	0	0.0	10.5	15.7
Upper	0	0.0	71.9	0	0.0	71.4	0	0.0	69.7	0	0.0	74.3	37.9
Unknown	13	100.0	4.0	7,155	100.0	14.6	37	100.0	4.0	16,712	100.0	10.2	0.0
Total	13	100.0	100.0	7,155	100.0	100.0	37	100.0	100.0	16,712	100.0	100.0	100.0
		l .	l .		Tota	l Home Mo	rtgage Loa	ns	ı	L		l .	Ш
Low	1	0.1	1.4	250	0.0	0.9	11	0.4	1.6	2,194	0.2	1.0	30.6

Moderate	9	0.5	5.9	2,920	0.3	2.9	35	1.3	7.0	10,585	0.8	3.4	15.8
Middle	2	0.1	17.4	880	0.1	11.0	5	0.2	18.5	2,001	0.1	11.7	15.7
Upper	10	0.6	61.1	4,719	0.5	68.8	3	0.1	60.5	2,837	0.2	69.5	37.9
Unknown	1,636	98.7	14.2	855,670	99.0	16.5	2,634	98.0	12.4	1,331,205	98.7	14.5	0.0
Total	1,658	100.0	100.0	864,439	100.0	100.0	2,688	100.0	100.0	1,348,822	100.0	100.0	100.0

		Table 62	2 - Distrib	ution of 20	20 and 20)21 Home	Mortgage	Lending I	By Borrov	ver Income	Level		
					Asses	ssment A	rea: New Yo	ork					
					Bank A	nd Aggreg	ate Loans By	Year					
Borrower Income			2020						20	21			Families by Family
Level	Bar	nk	Agg	Ban	ık	Agg	Ban	ık	Agg	Ban	k	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pur	pose LOC						
Low	0	0.0	1.7	0	0.0	1.0	0	0.0	3.5	0	0.0	3.4	30.6
Moderate	0	0.0	4.9	0	0.0	2.1	1	2.4	4.8	275	1.3	2.4	15.8
Middle	0	0.0	13.2	0	0.0	6.9	0	0.0	13.3	0	0.0	7.1	15.7
Upper	0	0.0	71.3	0	0.0	76.2	0	0.0	69.9	0	0.0	70.6	37.9
Unknown	23	100.0	8.9	10,507	100.0	13.9	41	97.6	8.5	20,910	98.7	16.6	0.0
Total	23	100.0	100.0	10,507	100.0	100.0	42	100.0	100.0	21,185	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exem	npt					
Low	0	0.0	1.8	0	0.0	0.5	0	0.0	5.0	0	0.0	2.3	30.6
Moderate	0	0.0	5.6	0	0.0	1.2	1	0.9	6.6	250	0.5	1.4	15.8
Middle	0	0.0	12.0	0	0.0	3.1	0	0.0	12.0	0	0.0	2.8	15.7
Upper	1	1.8	65.8	360	1.4	64.4	0	0.0	59.8	0	0.0	62.4	37.9
Unknown	55	98.2	14.8	25,599	98.6	30.8	107	99.1	16.5	48,451	99.5	31.2	0.0
Total	56	100.0	100.0	25,959	100.0	100.0	108	100.0	100.0	48,701	100.0	100.0	100.0
					Pi	urpose No	t Applicable						-
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	30.6
Moderate	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	15.8
Middle	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0	0.0	0.4	15.7

Rated Area: State of New York

Upper	0	0.0	0.5	0	0.0	0.7	0	0.0	0.8	0	0.0	0.6	37.9
Unknown	0	0.0	99.0	0	0.0	99.0	0	0.0	98.6	0	0.0	98.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Tabl	e 63 - Dist	ribution of 202	2 and 202	3 Home N	∕lortgage l	ending By	Borrowe	r Income Lev	el		
					Assess	ment Are	a: New Yo	rk					
					Bank A	nd Aggrega	te Loans B	y Year					
Borrower			2022							2023			Families by Family
Income Level	Ва	nk	Agg	Bank		Agg	Ва	ınk	Agg	Ban	k	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Но	me Purcha	se Loans						
Low	12	0.6	1.5	2,992	0.3	0.6	1	0.1	0.8	420	0.1	0.3	29.8
Moderate	40	1.9	8.3	16,545	1.5	3.4	4	0.3	4.7	1,520	0.2	1.5	16.0
Middle	2	0.1	17.8	1,800	0.2	10.4	1	0.1	12.7	270	0.0	6.2	16.2
Upper	1	0.0	57.4	2,800	0.3	69.0	5	0.4	49.5	2,766	0.4	53.2	38.0
Unknown	2,037	97.4	15.0	1,068,831	97.8	16.6	1,407	99.2	32.4	641,550	99.2	38.8	0.0
Total	2,092	100.0	100.0	1,092,968	100.0	100.0	1,418	100.0	100.0	646,526	100.0	100.0	100.0
						Refinance	Loans						
Low	12	4.3	3.6	2,547	1.7	1.9	0	0.0	2.7	0	0.0	1.1	29.8
Moderate	28	10.0	11.2	8,540	5.6	5.0	9	13.0	5.6	2,234	4.9	1.7	16.0
Middle	1	0.4	20.4	338	0.2	11.8	1	1.4	12.2	438	1.0	4.7	16.2
Upper	6	2.1	51.2	7,554	5.0	61.7	5	7.2	33.5	3,027	6.7	28.0	38.0
Unknown	233	83.2	13.6	133,489	87.6	19.6	54	78.3	46.0	39,605	87.4	64.5	0.0
Total	280	100.0	100.0	152,468	100.0	100.0	69	100.0	100.0	45,304	100.0	100.0	100.0
					Hom	e Improver	ment Loans						
Low	1	2.9	2.7	350	2.0	1.5	0	0.0	2.5	0	0.0	1.0	29.8

Moderate	1	2.9	8.4	157	0.9	4.6	1	2.6	8.2	219	1.3	3.0	16.0
Middle	0	0.0	21.1	0	0.0	13.2	0	0.0	17.7	0	0.0	8.7	16.2
Upper	0	0.0	65.1	0	0.0	72.7	0	0.0	62.8	0	0.0	63.6	38.0
Unknown	33	94.3	2.7	16,596	97.0	7.9	38	97.4	8.7	16,947	98.7	23.7	0.0
Total	35	100.0	100.0	17,103	100.0	100.0	39	100.0	100.0	17,166	100.0	100.0	100.0
	Total Home Mortgage Loans												
Low	26	1.1	2.3	6,039	0.5	1.0	12	0.7	1.3	497	0.1	0.5	29.8
Moderate	72	2.9	9.0	25,610	2.0	3.7	28	1.7	4.9	4,252	0.6	1.5	16.0
Middle	3	0.1	18.5	2,138	0.2	10.4	14	0.9	12.3	1,359	0.2	5.4	16.2
Upper	7	0.3	55.9	10,354	0.8	66.6	19	1.2	45.3	6,621	0.9	44.7	38.0
Unknown	2,363	95.6	14.3	1,253,113	96.6	18.3	1,544	95.5	36.2	722,521	98.3	48.0	0.0
Total	2,471	100.0	100.0	1,297,254	100.0	100.0	1,617	100.0	100.0	735,250	100.0	100.0	100.0

		Table 64	l - Distrib	ution of 20	22 and 20	23 Home	Mortgage	Lending I	By Borrov	ver Income	Level				
					Asses	ssment A	rea: New Yo	ork							
					Bank A	nd Aggreg	ate Loans By	Year							
Borrower Income			2022						20	23			Families by Family		
Level	Bar	nk	Agg	Ban	ık	Agg	Ban	k	Agg	Ban	ık	Agg	Income %		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%			
	Other Purpose LOC														
Low															
Moderate	1	4.0	7.7	5	0.0	3.6	13	22.0	6.3	120	1.2	1.7	16.0		
Middle	0	0.0	17.0	0	0.0	8.5	11	18.6	15.0	89	0.9	5.3	16.2		
Upper	0	0.0	66.8	0	0.0	68.9	8	13.6	59.8	68	0.7	52.0	38.0		
Unknown	24	96.0	2.8	12,675	100.0	12.8	16	27.1	15.7	9,605	96.4	39.7	0.0		
Total	25	100.0	100.0	12,680	100.0	100.0	59	100.0	100.0	9,959	100.0	100.0	100.0		
					Othe	r Purpose	Closed/Exem	npt							
Low	1	2.6	3.9	150	0.7	1.3	0	0.0	3.2	0	0.0	0.6	29.8		
Moderate	2	5.1	7.0	363	1.6	1.4	1	3.1	7.7	159	1.0	1.0	16.0		

Rated Area: State of New York

Middle		0.0	13.0	0	0.0	2.3	1	3.1	12.9	562	3.4	1.8	16.2	
ivildale	0	0.0	13.0	0	0.0	2.3	1	3.1	12.9	502	3.4	1.8	16.2	
Upper	0	0.0	62.3	0	0.0	65.7	1	3.1	46.2	760	4.7	34.8	38.0	
Unknown	36	92.3	13.7	21,522	97.7	29.3	29	90.6	30.0	14,814	90.9	61.8	0.0	
Total	39	100.0	100.0	22,035	100.0	100.0	32	100.0	100.0	16,295	100.0	100.0	100.0	
	Purpose Not Applicable													
Low	0	0.0	0.6	0	0.0	1.2	0	0.0	0.0	0	0.0	0.0	29.8	
Moderate	0	0.0	0.8	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	16.0	
Middle	0	0.0	0.6	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	16.2	
Upper	0	0.0	0.6	0	0.0	0.3	0	0.0	0.1	0	0.0	0.0	38.0	
Unknown	0	0.0	97.3	0	0.0	98.0	0	0.0	99.8	0	0.0	99.9	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0	

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

			Table 65 – Qua	lified Investments					
			Assessment Area	: State of New Yo	rk				
Assessment Areas	Prior Period	Investments	Current Perio	d Investments	Т	otal Investmer	nts	Unfunded Co	ommitments
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
Full Scope									
New York	20	45,492	54	35,000	74	80,493	68.0	-	-
Statewide/Regional	11	20,271	3	17,664	14	37,935	32.0		

			Table 66 –	Distrib	ution o	f Branc	h Deliv	ery System	and Branch	Openi	ngs/Clo	sing					
	Deposits		В	ranches					Branch Ope	enings /	Closing	s			Popu	lation	
Assessment Areas	% of Rated Area	# of Bank Branches	% of Rated Area		ation of I Inco	ome	•	# of Branch	# of Branch		•	n Locati s (+ or -		% of H	ousehol Geog	ds with	in each
	Deposits in AA	branches	Branches in AA	Low	Mod	Mid	Upp	Openings	Closings	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope																	
New York	100	6	100	66.7	16.7	16.7	0.0	0	0	0	0	0	0	15.1	24.9	28.1	30.7

Rated Area: State of Texas

Table 67 – Lending Volume of Reported Loans Retail Lending Evaluation Period: January 1, 2020 to December 31, 2023 Community Development Lending Evaluation Period: January 1, 2021 to August 12, 2024

Assessment Areas	% of Rated	Small Bu	usiness Loans	Small	Farm Loans	All HI	/IDA Loans		nmunity pment Loans	Total Re	ported Loans	% of Rated
	Area Loans	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	Deposits
Full Scope												
Houston	87	3,402	104,972	0	0	971	452,536	30	146,331	4,403	703,839	84.0
Statewide/Regional								27	159,962			
Limited Scope	ı	1	1		1			ı	1	'	<u>'</u>	<u>'</u>
Dallas	13	290	26,593	0	0	334	189,977	25	376,368	649	592,938	16.0

		Table 6	8 - Distrib	ution of 202	20 and 202	21 Small B	usiness Le	ending By	Income Le	evel of Geog	raphy		
					Asse	ssment A	rea: Houst	ton					
					Bank A	and Aggreg	ate Loans E	By Year					
Geographic			2	020					2	021			Total
Income Level	Ва	ınk	Agg	Ban	ık	Agg	Ва	ınk	Agg	Ban	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	403	41.2	11.5	14,242	30.0	13.8	189	35.3	11.0	8,438	28.7	13.7	11.5
Moderate	330	33.7	18.7	14,584	30.7	19.4	177	33.1	19.3	7,923	26.9	20.4	19.9
Middle	126	12.9	21.9	11,305	23.8	21.4	89	16.6	23.1	8,040	27.3	21.3	22.3
Upper	119	12.2	47.3	7,370	15.5	44.9	80	15.0	46.1	5,037	17.1	44.4	46.1
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.4	0	0.0	0.4	0	0.0	0.5	0	0.0	0.1	
Total	978	100.0	100.0	47,501	100.0	100.0	535	100.0	100.0	29,438	100.0	100.0	100.0

Rated Area: State of Texas

Table 69 - Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography

Assessment Area: Houston

					Bank A	And Aggreg	ate Loans E	By Year					
Geographic			2	022					2	023			Total
Income Level	Ва	ınk	Agg	Ban	ık	Agg	Ва	nk	Agg	Ban	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	414	41.6	9.2	4,800	45.6	10.6	332	37.1	8.6	2,049	11.7	10.0	10.0
Moderate	375	37.7	20.0	3,841	36.5	22.5	351	39.3	19.3	3,662	20.9	22.1	21.3
Middle	143	14.4	24.6	819	7.8	22.9	150	16.8	24.6	4,732	27.0	22.6	24.9
Upper	33	3.3	44.2	959	9.1	42.2	40	4.5	45.7	5,988	34.2	43.3	42.1
Unknown	30	3.0	1.6	102	1.0	1.7	21	2.3	1.5	1,081	6.2	1.9	1.7
Tract-Unk	0	0.0	0.4	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
Total	995	100.0	100.0	10,521	100.0	100.0	894	100.0	100.0	17,512	100.0	100.0	100.0

		Table 70) - Distribu	ition of 2020	and 2021	Home M	ortgage L	ending By	Income Le	evel of Geog	raphy		
					Asse	ssment Ar	ea: Houst	on					
					Bank A	And Aggreg	ate Loans I	By Year					
Geographic			2	020					2	021			Owner
Income Level	Ва	ınk	Agg	Ban	ık	Agg	Ва	ınk	Agg	Ban	k	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purch	ase Loans						
Low	7	5.6	3.5	1,481	5.8	2.8	7	4.3	3.9	1,885	5.7	2.9	6.4
Moderate	12	9.6	12.5	2,399	9.4	8.8	11	6.7	13.3	2,273	6.8	9.2	22.7
Middle	19	15.2	27.1	3,501	13.7	20.8	40	24.4	27.1	7,319	22.0	20.9	27.4
Upper	87	69.6	56.8	18,153	71.1	67.5	106	64.6	55.6	21,839	65.6	66.8	43.4
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	125	100.0	100.0	25,534	100.0	100.0	164	100.0	100.0	33,316	100.0	100.0	100.0

						Refinance	Loans						
Low	3	9.4	2.5	945	13.5	2.0	6	13.6	2.6	1,280	15.6	1.9	6.4
Moderate	4	12.5	9.3	1,326	18.9	6.3	7	15.9	10.6	1,246	15.2	7.0	22.7
Middle	7	21.9	21.2	782	11.2	15.5	14	31.8	24.1	1,808	22.1	17.3	27.4
Upper	18	56.3	66.9	3,959	56.5	76.1	17	38.6	62.7	3,865	47.1	73.7	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	32	100.0	100.0	7,012	100.0	100.0	44	100.0	100.0	8,199	100.0	100.0	100.0
					Hor	ne Improve	ment Loar	าร					
Low	0	0.0	2.9	0	0.0	2.0	0	0.0	3.1	0	0.0	2.4	6.4
Moderate	0	0.0	13.1	0	0.0	9.4	0	0.0	13.1	0	0.0	9.3	22.7
Middle	0	0.0	20.6	0	0.0	15.4	0	0.0	18.5	0	0.0	13.0	27.4
Upper	0	0.0	63.4	0	0.0	73.2	0	0.0	65.2	0	0.0	75.4	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
						Multifam	nily Loans						Multi-family Units %
Low	3	100.0	24.9	10,800	100.0	17.5	1	25.0	25.6	32,652	23.5	20.3	27.9
Moderate	0	0.0	26.0	0	0.0	21.9	1	25.0	30.7	54,000	38.9	27.1	28.3
Middle	0	0.0	20.4	0	0.0	22.0	0	0.0	15.7	0	0.0	18.3	19.2
Upper	0	0.0	28.8	0	0.0	38.6	2	50.0	27.8	52,150	37.6	33.3	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	1.0	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	10,800	100.0	100.0	4	100.0	100.0	138,802	100.0	100.0	100.0
					Tot	tal Home M	lortgage Lo	oans					Owner Occupied Units %
Low	13	8.1	3.1	13,226	30.5	3.1	14	6.6	3.3	35,817	19.9	3.6	6.4
Moderate	16	10.0	11.5	3,725	8.6	8.5	20	9.4	12.2	57,601	31.9	9.5	22.7

Middle	26	16.3	25.0	4,283	9.9	18.8	54	25.4	25.8	9,127	5.1	19.3	27.4
Upper	105	65.6	60.4	22,112	51.0	69.6	125	58.7	58.7	77,854	43.2	67.4	43.4
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	160	100.0	100.0	43,346	100.0	100.0	213	100.0	100.0	180,399	100.0	100.0	100.0

		Table 71	- Distribut	tion of 2020	and 202	21 Home	Mortgage	Lending E	By Income	e Level of G	eography	/	
					Ass	essment .	Area: Hou	ston					
					Bank A	nd Aggreg	ate Loans B	y Year					
Geographic			20	20					20	021			Owner Occupied
Income Level	Baı	nk	Agg	Ban	k	Agg	Bai	nk	Agg	Ban	k	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	rpose LOC						
Low	0	0.0	2.9	0	0.0	2.0	0	0.0	2.3	0	0.0	1.5	6.4
Moderate	0	0.0	10.6	0	0.0	5.0	0	0.0	10.1	0	0.0	6.4	22.7
Middle	0	0.0	18.1	0	0.0	10.3	0	0.0	16.6	0	0.0	10.8	27.4
Upper	0	0.0	68.3	0	0.0	82.6	0	0.0	70.9	0	0.0	81.4	43.4
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Oth	er Purpose	Closed/Exe	empt					
Low	0	0.0	3.5	0	0.0	1.7	0	0.0	3.9	0	0.0	2.0	6.4
Moderate	0	0.0	15.6	0	0.0	8.0	1	100.0	15.3	82	100.0	6.1	22.7
Middle	0	0.0	24.5	0	0.0	14.8	0	0.0	24.5	0	0.0	11.0	27.4
Upper	0	0.0	56.3	0	0.0	75.5	0	0.0	56.3	0	0.0	80.9	43.4
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	82	100.0	100.0	100.0

Rated Area: State of Texas

					F	urpose No	ot Applicabl	e					
Low	0	0.0	3.0	0	0.0	2.0	0	0.0	3.4	0	0.0	2.6	6.4
Moderate	0	0.0	21.3	0	0.0	15.4	0	0.0	22.0	0	0.0	15.5	22.7
Middle	0	0.0	41.8	0	0.0	35.9	0	0.0	42.3	0	0.0	41.0	27.4
Upper	0	0.0	33.8	0	0.0	46.8	0	0.0	32.3	0	0.0	40.9	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 72	: - Distribu	ition of 2022	and 2023	Home Mo	ortgage Le	ending By	Income Le	vel of Geog	raphy		
					Asses	sment Ar	ea: Houst	on					
					Bank A	nd Aggrega	ate Loans B	y Year					_
Geographic			2	2022					2	023			Owner
Income Level	Ва	ank	Agg	Ban	k	Agg	Ва	nk	Agg	Bar	ık	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Но	ome Purcha	se Loans						
Low	11	4.9	4.6	2,512	4.5	3.1	13	4.4	4.4	3,606	4.5	3.1	6.2
Moderate	43	19.1	15.4	8,786	15.6	10.7	70	23.5	15.4	16,149	20.1	11.0	21.4
Middle	80	35.6	30.2	18,665	33.1	25.2	83	27.9	32.1	20,523	25.6	27.3	29.5
Upper	90	40.0	48.9	26,188	46.4	60.3	128	43.0	47.1	38,629	48.2	57.7	42.1
Unknown	1	0.4	0.8	230	0.4	0.6	4	1.3	1.0	1,251	1.6	0.9	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	225	100.0	100.0	56,381	100.0	100.0	298	100.0	100.0	80,158	100.0	100.0	100.0
	•	•		•	•	Refinance	Loans	•	•		•		
Low	1	2.1	3.9	130	1.3	2.5	0	0.0	5.6	0	0.0	4.2	6.2
Moderate	6	12.8	17.0	895	8.9	11.0	6	33.3	21.0	1,228	29.0	14.9	21.4

		1	1	ı	1	1	1	Т	Т				1
Middle	21	44.7	30.9	4,100	40.6	23.7	6	33.3	32.3	1,017	24.0	26.0	29.5
Upper	19	40.4	47.5	4,974	49.3	62.2	6	33.3	40.5	1,984	46.9	54.4	42.1
Unknown	0	0.0	0.8	0	0.0	0.6	0	0.0	0.7	0	0.0	0.5	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	47	100.0	100.0	10,099	100.0	100.0	18	100.0	100.0	4,229	100.0	100.0	100.0
					Hom	e Improve	ment Loans	5					
Low	0	0.0	3.7	0	0.0	2.7	0	0.0	3.1	0	0.0	3.0	6.2
Moderate	1	33.3	12.5	146	31.3	8.6	0	0.0	13.4	0	0.0	11.0	21.4
Middle	2	66.7	23.1	321	68.7	18.0	0	0.0	26.3	0	0.0	20.6	29.5
Upper	0	0.0	60.0	0	0.0	70.2	0	0.0	56.6	0	0.0	64.7	42.1
Unknown	0	0.0	0.7	0	0.0	0.5	0	0.0	0.7	0	0.0	0.6	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	467	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
						Multifam	ily Loans						Multi-family Units %
Low	0	0.0	22.4	0	0.0	13.6	0	0.0	21.9	0	0.0	16.0	25.3
Moderate	0	0.0	28.0	0	0.0	20.3	1	100.0	28.4	1,600	100.0	26.5	27.6
Middle	0	0.0	19.3	0	0.0	28.0	0	0.0	17.9	0	0.0	19.9	19.9
Upper	2	100.0	26.8	74,970	100.0	32.9	0	0.0	28.9	0	0.0	33.4	22.8
Unknown	0	0.0	3.5	0	0.0	5.2	0	0.0	3.0	0	0.0	4.3	4.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	74,970	100.0	100.0	1	100.0	100.0	1,600	100.0	100.0	100.0
					Tota	al Home M	ortgage Lo	ans					Owner Occupied Units %
Low	12	4.3	4.4	2,642	1.9	4.8	13	4.1	4.5	3,606	4.2	4.2	6.2
Moderate	50	18.0	15.9	9,827	6.9	12.3	78	24.4	16.0	19,217	22.2	12.5	21.4
Middle	103	37.1	30.2	23,086	16.2	25.3	89	27.8	31.8	21,540	24.8	26.4	29.5
Upper	112	40.3	48.7	106,300	74.8	56.3	136	42.5	46.8	41,092	47.4	55.7	42.1
Unknown	1	0.4	0.8	230	0.2	1.4	4	1.3	0.9	1,251	1.4	1.2	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	278	100.0	100.0	142,085	100.0	100.0	320	100.0	100.0	86,706	100.0	100.0	100.0

Rated Area: State of Texas

Table 73 - Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography

Assessment Area: Houston

	1												
					Bank Ar	nd Aggrega	ate Loans B	y Year					
Geographic			20)22					20	023			Owner Occupied
Income Level	Ва	nk	Agg	Bar	ık	Agg	Ва	nk	Agg	Ban	ık	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	rpose LOC						
Low	0	0.0	2.4	0	0.0	1.3	0	0.0	2.6	0	0.0	1.5	6.2
Moderate	0	0.0	8.7	0	0.0	5.4	0	0.0	8.2	0	0.0	4.9	21.4
Middle	0	0.0	21.9	0	0.0	16.2	0	0.0	24.3	0	0.0	17.2	29.5
Upper	0	0.0	66.2	0	0.0	76.4	0	0.0	64.3	0	0.0	75.8	42.1
Unknown	0	0.0	0.8	0	0.0	0.7	0	0.0	0.7	0	0.0	0.6	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Othe	er Purpose	Closed/Ex	empt					
Low	0	0.0	3.7	0	0.0	1.9	0	0.0	4.4	0	0.0	4.5	6.2
Moderate	0	0.0	16.8	0	0.0	8.6	1	33.3	17.1	240	33.4	14.0	21.4
Middle	0	0.0	28.1	0	0.0	16.5	0	0.0	30.1	0	0.0	22.1	29.5
Upper	1	100.0	50.8	168	100.0	71.7	2	66.7	47.4	479	66.6	57.5	42.1
Unknown	0	0.0	0.6	0	0.0	1.3	0	0.0	1.0	0	0.0	2.0	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	168	100.0	100.0	3	100.0	100.0	719	100.0	100.0	100.0
					P	urpose No	t Applicab	le					
Low	0	0.0	4.5	0	0.0	8.4	0	0.0	4.2	0	0.0	2.3	6.2
Moderate	0	0.0	28.8	0	0.0	20.1	0	0.0	26.2	0	0.0	15.3	21.4
Middle	0	0.0	40.8	0	0.0	36.5	0	0.0	40.6	0	0.0	30.3	29.5
Upper	0	0.0	25.1	0	0.0	34.3	0	0.0	27.9	0	0.0	28.1	42.1
Unknown	0	0.0	0.9	0	0.0	0.7	0	0.0	1.1	0	0.0	24.0	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

Rated Area: State of Texas

Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
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Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 74	- Distribut	ion of 2020	and 2021	Small Bu	siness Ler	nding By R	evenue S	ize of Busin	esses		
					Assess	ment Are	a: Housto	on					
					Bank A	nd Aggreg	ate Loans	By Year					
			2	020					2	021			Total
	Ва	ınk	Agg	Ban	ık	Agg	Ва	ınk	Agg	Bar	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	570	58.3	37.7	7,970	16.8	23.5	296	55.3	41.7	4,947	16.8	26.3	91.7
Over \$1 Million	14	1.4		6,956	14.6		20	3.7		8,621	29.3		7.2
Revenue Unknown	394	40.3		32,575	68.6		219	40.9		15,870	53.9		1.0
Total	978	100.0		47,501	100.0		535	100.0		29,438	100.0		100.0
						By Loan	Size						
\$100,000 or Less	872	89.2	88.2	11,063	23.3	32.2	474	88.6	92.4	7,222	24.5	36.7	
\$100,001 - \$250,000	56	5.7	6.6	8,937	18.8	19.5	26	4.9	4.2	4,007	13.6	17.4	
\$250,001 - \$1 Million	50	5.1	5.2	27,501	57.9	48.2	35	6.5	3.4	18,209	61.9	45.8	
Total	978	100.0	100.0	47,501	100.0	100.0	535	100.0	100.0	29,438	100.0	100.0	
				Ву І	oan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	557	97.7		1,890	23.7		287	97.0		1,204	24.3		
\$100,001 - \$250,000	3	0.5		522	6.5		2	0.7		362	7.3		
\$250,001 - \$1 Million	10	1.8		5,558	69.7		7	2.4		3,381	68.3		
Total	570	100.0		7,970	100.0		296	100.0		4,947	100.0		

		Table 75	- Distribut	ion of 2022					levenue S	ize of Busin	esses		
	,				Assess	sment Are	ea: Housto	on					
					Bank A	and Aggreg	ate Loans	By Year					
			2	022		,			2	023			Total
	Ва	ank	Agg	Bar	nk 	Agg	Ва	ank	Agg	Bar	nk 	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	973	97.8	50.1	5,988	56.9	34.2	867	97.0	53.1	8,134	46.4	33.7	91.9
Over \$1 Million	12	1.2		2,771	26.3		16	1.8		5,595	31.9		7.0
Revenue Unknown	10	1.0		1,762	16.7		11	1.2		3,783	21.6		1.1
Total	995	100.0		10,521	100.0		894	100.0		17,512	100.0		100.0
		1			1	By Loan	Size	1			1		11
\$100,000 or Less	980	98.5	94.6	3,414	32.4	41.0	872	97.5	94.7	3,168	18.1	42.0	
\$100,001 - \$250,000	6	0.6	2.9	907	8.6	14.9	2	0.2	2.9	285	1.6	15.2	
\$250,001 - \$1 Million	9	0.9	2.5	6,200	58.9	44.0	20	2.2	2.5	14,059	80.3	42.8	
Total	995	100.0	100.0	10,521	100.0	100.0	894	100.0	100.0	17,512	100.0	100.0	
		-		Ву	Loan Size a	nd Revenu	es \$1 Millio	on or Less	-				
\$100,000 or Less	968	99.5		3,125	52.2		858	99.0		2,844	35.0		
\$100,001 - \$250,000	1	0.1		111	1.9		1	0.1		155	1.9		
\$250,001 - \$1 Million	4	0.4		2,752	46.0		8	0.9		5,135	63.1		
Total	973	100.0		5,988	100.0		867	100.0		8,134	100.0		

Rated Area: State of Texas

Table 76 - Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level **Assessment Area: Houston Bank And Aggregate Loans By Year** Families by 2020 2021 **Borrower** Family Income Level Bank Bank Agg Bank Bank Agg Agg Agg Income % # #% #% \$(000) \$% \$% # #% #% \$(000) \$% \$% **Home Purchase Loans** 3 5.9 Low 2.4 3.3 404 1.6 1.6 12 7.3 2.4 1,960 1.2 25.7 Moderate 20 16.0 19.6 3,981 15.6 13.2 25 15.2 14.6 4,844 14.5 9.8 16.4 Middle 4 3.2 23.5 842 3.3 19.6 12 7.3 20.5 3,024 9.1 17.0 16.9 Upper 7 5.6 43.4 2,341 9.2 55.5 3 1.8 40.0 874 2.6 52.5 41.1 Unknown 91 72.8 10.2 17,966 70.4 10.0 112 68.3 22.5 22.614 67.9 19.5 0.0 Total 125 100.0 100.0 25,534 100.0 100.0 164 100.0 100.0 33,316 100.0 100.0 100.0 Refinance Loans Low 0 0.0 2.0 0.0 0.9 20.5 2.6 1,072 13.1 1.2 25.7 Moderate 7 21.9 8.2 1,048 14.9 4.6 12 27.3 9.9 1,794 21.9 5.8 16.4 Middle 4 6 18.8 15.2 1,129 16.1 10.9 9.1 16.8 509 6.2 12.1 16.9 31.3 5 59.5 Upper 10 54.4 3,160 45.1 64.3 11.4 48.6 1,418 17.3 41.1 9 28.1 20.2 1,675 23.9 19.3 14 31.8 22.1 41.5 21.3 0.0 Unknown 3,406 32 44 Total 100.0 100.0 7.012 100.0 100.0 100.0 100.0 8.199 100.0 100.0 100.0 **Home Improvement Loans** 0 0.0 4.1 0 0.0 2.0 0.0 4.7 0 0.0 2.5 25.7 Low 0 0 9.2 6.3 Moderate 0.0 10.8 0 0.0 7.1 0.0 0 0.0 16.4 Middle 0 0.0 0 0.0 12.0 16.9 0.0 16.7 0.0 11.9 16.5 0 0 0 75.1 Upper 0.0 65.1 0 0.0 74.3 0.0 66.7 0.0 41.1 Unknown 0 0.0 3.3 0 0.0 4.6 0 0.0 2.9 0 0.0 4.2 0.0 Total 0 0.0 100.0 0 0.0 100.0 0.0 100.0 0 0.0 100.0 100.0 **Total Home Mortgage Loans** 3 10.5 7.5 Low 1.9 2.6 404 1.2 1.2 22 2.6 3,114 1.2 25.7 27 17.2 13.4 5,029 15.5 8.8 37 17.7 12.2 6,638 16.0 8.0 16.4 Moderate

Middle	10	6.4	18.5	1,971	6.1	14.9	16	7.7	18.5	3,533	8.5	14.7	16.9
Upper	17	10.8	46.8	5,501	16.9	58.5	8	3.8	43.9	2,292	5.5	55.5	41.1
Unknown	100	63.7	18.8	19,641	60.3	16.5	126	60.3	22.9	26,020	62.6	20.6	0.0
Total	157	100.0	100.0	32,546	100.0	100.0	209	100.0	100.0	41,597	100.0	100.0	100.0

		Table 7	7 - Distrib	ution of 20	20 and 2	021 Hom	e Mortgage	Lending	By Borro	wer Income	Level		
					Ass	essment /	Area: Houst	ton					
					Bank A	and Aggreg	gate Loans By	/ Year					
Borrower Income			2020						20	21			Families by Family
Level	Bar	nk	Agg	Ban	k	Agg	Bar	nk	Agg	Bar	nk	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	rpose LOC						
Low	0	0.0	5.1	0	0.0	1.7	0	0.0	5.9	0	0.0	2.4	25.7
Moderate	0	0.0	11.5	0	0.0	5.5	0	0.0	9.7	0	0.0	5.3	16.4
Middle	0	0.0	15.3	0	0.0	8.3	0	0.0	14.7	0	0.0	9.6	16.9
Upper	0	0.0	64.3	0	0.0	82.1	0	0.0	67.2	0	0.0	80.2	41.1
Unknown	0	0.0	3.8	0	0.0	2.4	0	0.0	2.5	0	0.0	2.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Othe	er Purpose	Closed/Exer	mpt					
Low	0	0.0	5.9	0	0.0	2.4	1	100.0	5.9	82	100.0	2.7	25.7
Moderate	0	0.0	12.6	0	0.0	6.0	0	0.0	13.3	0	0.0	6.3	16.4
Middle	0	0.0	17.9	0	0.0	10.0	0	0.0	17.7	0	0.0	8.5	16.9
Upper	0	0.0	53.5	0	0.0	67.9	0	0.0	57.2	0	0.0	72.0	41.1
Unknown	0	0.0	10.1	0	0.0	13.8	0	0.0	5.9	0	0.0	10.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	82	100.0	100.0	100.0
					P	urpose No	t Applicable		•		-		
Low	0	0.0	0.4	0	0.0	0.3	0	0.0	0.6	0	0.0	0.3	25.7
Moderate	0	0.0	0.6	0	0.0	0.5	0	0.0	0.9	0	0.0	0.7	16.4
Middle	0	0.0	0.6	0	0.0	0.6	0	0.0	0.3	0	0.0	0.3	16.9

Rated Area: State of Texas

Upper	0	0.0	0.3	0	0.0	0.5	0	0.0	0.3	0	0.0	0.4	41.1
Unknown	0	0.0	98.2	0	0.0	98.1	0	0.0	98.0	0	0.0	98.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table	78 - Distri	ibution of 20	22 and 20	23 Home I	Mortgage	Lending B	y Borrowe	r Income Lev	/el		
					Asse	ssment Ar	ea: Housto	on					
					Bank A	And Aggreg	ate Loans B	y Year					
Borrower			2022						2	023			Families by Family
Income Level	Ва	nk	Agg	Ban	ık	Agg	Ва	ınk	Agg	Ban	ık	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purcha	ase Loans						
Low	22	9.8	2.9	4,460	7.9	1.3	23	7.7	1.9	4,372	5.5	0.9	25.1
Moderate	51	22.7	15.2	11,987	21.3	9.7	85	28.5	12.8	19,818	24.7	8.2	17.1
Middle	23	10.2	21.2	6,299	11.2	17.2	44	14.8	19.7	12,221	15.2	15.9	17.7
Upper	7	3.1	41.7	2,167	3.8	53.6	14	4.7	39.8	6,166	7.7	51.2	40.1
Unknown	122	54.2	19.1	31,468	55.8	18.3	132	44.3	25.8	37,581	46.9	23.8	0.0
Total	225	100.0	100.0	56,381	100.0	100.0	298	100.0	100.0	80,158	100.0	100.0	100.0
						Refinance	Loans						
Low	8	17.0	7.6	1,314	13.0	3.8	0	0.0	7.8	0	0.0	4.1	25.1
Moderate	11	23.4	17.6	1,869	18.5	11.2	5	27.8	16.4	757	17.9	10.5	17.1
Middle	3	6.4	21.3	772	7.6	16.5	3	16.7	19.9	582	13.8	15.2	17.7
Upper	1	2.1	40.5	1,105	10.9	54.3	3	16.7	40.6	703	16.6	53.0	40.1
Unknown	24	51.1	13.0	5,039	49.9	14.2	7	38.9	15.3	2,187	51.7	17.1	0.0
Total	47	100.0	100.0	10,099	100.0	100.0	18	100.0	100.0	4,229	100.0	100.0	100.0

					Hon	ne Improve	ment Loans	s					
Low	0	0.0	5.7	0	0.0	3.3	0	0.0	5.1	0	0.0	3.1	25.1
Moderate	0	0.0	11.9	0	0.0	7.6	0	0.0	12.6	0	0.0	8.1	17.1
Middle	0	0.0	17.0	0	0.0	12.2	0	0.0	18.4	0	0.0	13.1	17.7
Upper	0	0.0	63.2	0	0.0	73.9	0	0.0	61.7	0	0.0	70.7	40.1
Unknown	3	100.0	2.2	467	100.0	2.9	0	0.0	2.2	0	0.0	4.9	0.0
Total	3	100.0	100.0	467	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Total	Home Mo	rtgage Loar	ıs					
Low	30	10.9	4.2	5,774	8.6	1.9	23	7.2	2.9	4,372	5.1	1.2	25.1
Moderate	62	22.5	15.5	13,856	20.6	9.9	92	28.8	13.1	21,054	24.7	8.4	17.1
Middle	26	9.4	20.7	7,071	10.5	16.8	48	15.0	19.5	13,043	15.3	15.7	17.7
Upper	8	2.9	41.8	3,272	4.9	53.9	17	5.3	40.9	6,869	8.1	51.7	40.1
Unknown	150	54.3	17.8	37,142	55.3	17.5	139	43.6	23.6	39,768	46.7	23.0	0.0
Total	276	100.0	100.0	67,115	100.0	100.0	319	100.0	100.0	85,106	100.0	100.0	100.0

		Table 79	9 - Distrib	ution of 202			Mortgage Area: Housto	_	By Borrov	ver Income	Level		
					Bank A	nd Aggreg	ate Loans By	Year					
Borrower Income			2022						20	23			Families by Family
Level	Dalik Ass Dalik Ass Dalik												
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pur	pose LOC						
Low	0	0.0	5.9	0	0.0	3.8	0	0.0	7.2	0	0.0	4.2	25.1
Moderate	0	0.0	11.5	0	0.0	6.3	0	0.0	9.0	0	0.0	5.1	17.1
Middle	0	0.0	15.6	0	0.0	10.9	0	0.0	15.5	0	0.0	9.0	17.7
Upper	0	0.0	62.7	0	0.0	74.9	0	0.0	66.4	0	0.0	79.8	40.1
Unknown	0	0.0	4.3	0	0.0	4.1	0	0.0	2.0	0	0.0	1.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Rated Area: State of Texas

					Othe	r Purpose	Closed/Exem	ıpt					
Low	0	0.0	7.6	0	0.0	4.4	0	0.0	6.1	0	0.0	3.9	25.1
Moderate	0	0.0	16.7	0	0.0	8.7	2	66.7	15.8	479	66.6	10.4	17.1
Middle	0	0.0	19.2	0	0.0	10.4	1	33.3	22.6	240	33.4	14.8	17.7
Upper	0	0.0	49.3	0	0.0	64.1	0	0.0	48.3	0	0.0	58.0	40.1
Unknown 1 100.0 7.3 168 100.0 12.4 0 0.0 7.2 0 0.0 12.9													0.0
Total 1 100.0 100.0 168 100.0 100.0 3 100.0 100.0 719 100.0 100.0												100.0	
					Pı	urpose No	t Applicable						
Low	0	0.0	1.5	0	0.0	0.8	0	0.0	1.7	0	0.0	0.9	25.1
Moderate	0	0.0	1.3	0	0.0	1.2	0	0.0	2.0	0	0.0	1.3	17.1
Middle	0	0.0	0.4	0	0.0	0.3	0	0.0	0.5	0	0.0	0.5	17.7
Upper	0	0.0	0.2	0	0.0	0.3	0	0.0	0.1	0	0.0	0.0	40.1
Unknown	0	0.0	96.7	0	0.0	97.3	0	0.0	95.6	0	0.0	97.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 8	0 - Distrib	ution of 202	20 and 202	21 Small B	usiness Le	ending By	Income Le	evel of Geog	raphy			
					Ass	essment /	Area: Dall	as						
					Bank A	and Aggreg	ate Loans I	By Year						
Geographic			2	020					2	021			Total	
Income Level	Ва	Bank Agg Bank Agg Bank Agg Bank Agg												
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
Low	21	14.8	8.8	877	8.4	10.0	15	16.5	8.7	568	9.4	9.6	9.3	
Moderate	55	38.7	21.0	3,127	30.0	22.6	40	44.0	21.2	2,038	33.9	23.1	21.4	
Middle	28	19.7	21.9	2,230	21.4	22.1	14	15.4	21.9	671	11.2	21.4	23.2	
Upper	33	23.2	46.7	3,748	36.0	42.7	21	23.1	46.7	2,728	45.4	43.7	45.1	
Unknown	5	3.5	1.2	428	4.1	2.5	1	1.1	1.1	10	0.2	2.2	1.0	
Tract-Unk	0	0.0	0.3	0	0.0	0.2	0	0.0	0.4	0	0.0	0.1		
Total	142	100.0	100.0	10,410	100.0	100.0	91	100.0	100.0	6,015	100.0	100.0	100.0	

		Table 8	1 - Distrib	ution of 202	22 and 202	23 Small B	usiness Le	ending By	Income Le	vel of Geog	raphy		
					Ass	essment A	Area: Dall	as					
					Bank A	and Aggreg	ate Loans I	By Year					
Geographic			2	022					2	023			Total
Income Level	Ва	ank	Agg	Businesses %									
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	2	7.4	5.7	370	6.1	5.9	4	13.3	4.7	125	3.1	4.8	5.6
Moderate	3	11.1	19.2	245	4.0	18.2	9	30.0	19.0	1,664	40.7	19.2	20.4
Middle	16	59.3	28.5	3,957	65.1	28.9	9	30.0	29.7	1,305	31.9	29.2	30.7
Upper	6	22.2	45.1	1,507	24.8	45.6	8	26.7	44.9	995	24.3	44.8	41.7
Unknown	0	0.0	1.1	0	0.0	1.3	0	0.0	1.4	0	0.0	1.9	1.5
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.4	0	0.0	0.1	
Total	27	100.0	100.0	6,079	100.0	100.0	30	100.0	100.0	4,089	100.0	100.0	100.0

	7	Гable 82 -	Distributi	on of 2020	and 2021	Home Mo	ortgage Len	ding By In	come Lev	el of Geogr	aphy			
					Asse	ssment A	rea: Dallas							
					Bank A	nd Aggreg	ate Loans By	Year						
Geographic			20	20					20	21			Owner	
Income Level	Bai	nk	Agg	Bar	nk	Agg	Bai	nk	Agg	Bar	nk	Agg	Occupied Units %	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
	# #% #% \$(000) \$% \$% # #% \$(000) \$% \$% Home Purchase Loans													
Low	3	8.1	5.8	394	4.8	4.0	1	2.2	5.9	156	1.3	3.8	7.0	
Moderate	3	8.1	17.5	649	7.9	11.9	4	8.7	17.6	824	6.8	12.0	24.9	
Middle	6	16.2	25.3	935	11.4	20.7	14	30.4	26.3	2,911	24.0	20.8	22.9	
Upper	24	64.9	50.9	6,108	74.7	62.9	27	58.7	49.6	8,217	67.9	62.8	45.1	
Unknown	1	2.7	0.5	86	1.1	0.5	0	0.0	0.6	0	0.0	0.6	0.2	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
Total	37	100.0	100.0	8,172	100.0	100.0	46	100.0	100.0	12,108	100.0	100.0	100.0	

						Refinance	Loans						
Low	0	0.0	3.0	0	0.0	2.5	1	25.0	3.1	462	51.0	2.3	7.0
Moderate	0	0.0	10.8	0	0.0	7.1	0	0.0	12.9	0	0.0	8.3	24.9
Middle	4	50.0	20.2	619	41.2	15.8	2	50.0	21.6	345	38.1	16.5	22.9
Upper	3	37.5	65.8	654	43.5	74.5	1	25.0	62.1	99	10.9	72.7	45.1
Unknown	1	12.5	0.2	230	15.3	0.2	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	1,503	100.0	100.0	4	100.0	100.0	906	100.0	100.0	100.0
					Hom	e Improver	ment Loans						
Low	0	0.0	2.5	0	0.0	1.8	0	0.0	2.8	0	0.0	1.7	7.0
Moderate	0	0.0	10.4	0	0.0	7.1	0	0.0	10.9	0	0.0	6.9	24.9
Middle	0	0.0	17.0	0	0.0	14.3	0	0.0	16.4	0	0.0	11.7	22.9
Upper	0	0.0	69.9	0	0.0	76.7	0	0.0	69.7	0	0.0	79.5	45.1
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
						Multifam	ily Loans						Multi-family Units %
Low	1	50.0	26.8	425	23.3	22.3	1	33.3	28.4	22,525	47.2	20.1	26.2
Moderate	1	50.0	40.0	1,400	76.7	25.5	2	66.7	35.2	25,201	52.8	22.9	26.8
Middle	0	0.0	19.0	0	0.0	25.9	0	0.0	19.0	0	0.0	32.0	20.6
Upper	0	0.0	13.9	0	0.0	26.2	0	0.0	16.8	0	0.0	23.7	25.5
Unknown	0	0.0	0.3	0	0.0	0.0	0	0.0	0.6	0	0.0	1.3	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	1,825	100.0	100.0	3	100.0	100.0	47,726	100.0	100.0	100.0
	Variable Variable											Owner Occupied Units %	
Low	4	8.5	4.2	819	7.1	4.3	3	5.7	4.4	23,143	38.1	4.3	7.0
Moderate	4	8.5	14.4	2,049	17.8	10.3	6	11.3	15.2	26,025	42.8	11.1	24.9
Middle	10	21.3	22.6	1,554	13.5	18.5	16	30.2	23.6	3,256	5.4	19.5	22.9

Upper	27	57.4	58.5	6,762	58.8	66.6	28	52.8	56.5	8,316	13.7	64.5	45.1
Unknown	2	4.3	0.3	316	2.7	0.3	0	0.0	0.4	0	0.0	0.5	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	47	100.0	100.0	11,500	100.0	100.0	53	100.0	100.0	60,740	100.0	100.0	100.0

	1	Гable 83 -	Distribut	ion of 2020	and 202	1 Home I	Mortgage	Lending E	By Income	e Level of G	eograph	У	
					As	sessment	Area: Dall	las					
					Bank Ar	nd Aggrega	te Loans By	y Year					
Geographic			20	20					20)21			Owner Occupied
Income Level	Bar	nk	Agg	Ban	k	Agg	Baı	nk	Agg	Ban	k	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	rpose LOC						
Low	0	0.0	2.8	0	0.0	1.4	0	0.0	2.3	0	0.0	1.3	7.0
Moderate	0	0.0	9.9	0	0.0	5.6	0	0.0	10.5	0	0.0	6.5	24.9
Middle	0	0.0	16.2	0	0.0	10.1	0	0.0	13.7	0	0.0	8.0	22.9
Upper	0	0.0	71.0	0	0.0	82.8	0	0.0	73.3	0	0.0	84.1	45.1
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Othe	er Purpose	Closed/Exe	mpt					
Low	0	0.0	4.4	0	0.0	1.7	0	0.0	3.9	0	0.0	1.3	7.0
Moderate	0	0.0	15.9	0	0.0	7.6	0	0.0	16.3	0	0.0	6.5	24.9
Middle	0	0.0	20.7	0	0.0	10.9	0	0.0	16.7	0	0.0	8.7	22.9
Upper	0	0.0	58.7	0	0.0	74.6	0	0.0	62.7	0	0.0	83.0	45.1
Unknown	0	0.0	0.3	0	0.0	5.2	0	0.0	0.4	0	0.0	0.5	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
	•	•			P	urpose No	t Applicable	e	•	•		•	
Low	0	0.0	5.1	0	0.0	2.8	0	0.0	6.4	0	0.0	3.7	7.0

Rated Area: State of Texas

Moderate	0	0.0	32.5	0	0.0	20.0	0	0.0	35.2	0	0.0	23.3	24.9
Middle	0	0.0	32.0	0	0.0	27.8	0	0.0	32.0	0	0.0	27.7	22.9
Upper	0	0.0	30.3	0	0.0	49.3	0	0.0	26.3	0	0.0	45.2	45.1
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 84	- Distribu	tion of 2022	and 2023	Home M	ortgage Le	ending By	Income Le	vel of Geog	raphy		
					Asse	essment A	rea: Dalla	s					
					Bank A	And Aggreg	ate Loans E	By Year					
Geographic			2	022					2	023			Owner
Income Level	Ва	ınk	Agg	Ban	k	Agg	Ва	ınk	Agg	Ban	k	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purch	ase Loans						
Low	4	7.3	7.2	1,352	6.9	3.4	6	5.2	3.7	1,577	4.5	2.4	4.7
Moderate	23	41.8	16.7	7,385	37.6	11.4	49	42.6	19.0	15,626	45.0	14.6	21.5
Middle	11	20.0	30.2	2,728	13.9	25.4	29	25.2	36.8	6,866	19.8	31.9	33.5
Upper	17	30.9	45.1	8,183	41.6	58.9	29	25.2	39.9	9,882	28.5	50.6	39.8
Unknown	0	0.0	0.7	0	0.0	0.9	2	1.7	0.5	740	2.1	0.5	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	55	100.0	100.0	19,648	100.0	100.0	115	100.0	100.0	34,691	100.0	100.0	100.0
	•	•				Refinance	Loans	•					
Low	2	5.7	4.4	345	4.6	2.3	1	6.7	4.1	177	4.0	2.5	4.7
Moderate	16	45.7	17.6	3,113	41.3	10.7	4	26.7	19.6	758	16.9	13.6	21.5
Middle	10	28.6	30.2	1,505	20.0	22.7	7	46.7	34.9	2,718	60.8	28.0	33.5

Upper	7	20.0	47.2	2,566	34.1	63.5	3	20.0	41.0	821	18.4	55.6	39.8
Unknown	0	0.0	0.6	0	0.0	0.8	0	0.0	0.3	0	0.0	0.4	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.5
Total	35	100.0	100.0	7,529	100.0	100.0	15	100.0	100.0	4,474	100.0	100.0	100.0
Total	33	100.0	100.0	7,525		ne Improve			100.0	1,171	100.0	100.0	100.0
Low	0	0.0	2.8	0	0.0	1.7	0	0.0	2.1	0	0.0	1.6	4.7
Moderate	0	0.0	11.7	0	0.0	8.3	0	0.0	11.9	0	0.0	8.2	21.5
Middle	0	0.0	21.4	0	0.0	16.7	0	0.0	30.1	0	0.0	21.3	33.5
Upper	0	0.0	63.6	0	0.0	72.8	1	100.0	55.3	218	100.0	68.2	39.8
Unknown	0	0.0	0.5	0	0.0	0.5	0	0.0	0.6	0	0.0	0.7	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	218	100.0	100.0	100.0
		•				Multifam	ily Loans	•	I				Multi-family Units %
Low	1	16.7	21.1	1,170	2.5	13.1	1	100.0	16.2	2,165	100.0	12.1	16.8
Moderate	3	50.0	35.8	22,746	49.1	28.9	0	0.0	30.6	0	0.0	21.0	27.1
Middle	2	33.3	19.9	22,398	48.4	26.5	0	0.0	29.6	0	0.0	31.0	28.1
Upper	0	0.0	21.1	0	0.0	30.0	0	0.0	20.6	0	0.0	33.2	25.1
Unknown	0	0.0	2.1	0	0.0	1.5	0	0.0	3.0	0	0.0	2.7	2.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	46,314	100.0	100.0	1	100.0	100.0	2,165	100.0	100.0	100.0
					Tot	al Home M	ortgage Lo	ans					Owner Occupied Units %
Low	7	6.9	6.4	2,867	3.8	4.8	8	6.0	3.7	3,919	9.4	3.4	4.7
Moderate	43	42.6	16.9	33,389	43.9	14.2	53	39.8	18.8	16,384	39.3	15.0	21.5
Middle	25	24.8	29.5	26,991	35.5	24.7	37	27.8	36.0	9,682	23.2	31.1	33.5
Upper	26	25.7	46.5	12,844	16.9	55.4	33	24.8	41.0	10,921	26.2	49.8	39.8
Unknown	0	0.0	0.7	0	0.0	1.0	2	1.5	0.5	740	1.8	0.8	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	101	100.0	100.0	76,091	100.0	100.0	133	100.0	100.0	41,646	100.0	100.0	100.0

		Table 85 -	- Distribu	tion of 2022			Mortgage : Area: Dal	_	By Income	e Level of G	eography	1	
					Bank Ar	nd Aggrega	ate Loans B	y Year					
Geographic				22		T -			1)23			Owner Occupied
Income Level	Bar		Agg	Ban	1	Agg	Ba	1	Agg	Ban		Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	T	T	T		T		rpose LOC	T	T		T	1	
Low	0	0.0	1.1	0	0.0	0.5	0	0.0	1.7	0	0.0	0.8	4.7
Moderate	0	0.0	7.6	0	0.0	4.6	0	0.0	11.0	0	0.0	6.5	21.5
Middle	0	0.0	18.4	0	0.0	12.1	0	0.0	26.4	0	0.0	18.4	33.5
Upper	0	0.0	72.1	0	0.0	82.2	0	0.0	60.5	0	0.0	73.8	39.8
Unknown	0	0.0	0.7	0	0.0	0.6	0	0.0	0.4	0	0.0	0.5	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Othe	r Purpose	Closed/Exe	empt					
Low	0	0.0	5.1	0	0.0	1.7	0	0.0	3.0	0	0.0	1.9	4.7
Moderate	1	20.0	12.6	145	5.6	5.5	0	0.0	16.0	0	0.0	8.7	21.5
Middle	2	40.0	24.4	360	13.8	12.0	1	100.0	32.4	98	100.0	19.5	33.5
Upper	2	40.0	57.0	2,095	80.6	79.6	0	0.0	47.9	0	0.0	69.3	39.8
Unknown	0	0.0	0.9	0	0.0	1.2	0	0.0	0.7	0	0.0	0.6	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	5	100.0	100.0	2,600	100.0	100.0	1	100.0	100.0	98	100.0	100.0	100.0
					Р	urpose No	t Applicabl	e					
Low	0	0.0	21.0	0	0.0	10.6	0	0.0	8.2	0	0.0	9.7	4.7
Moderate	0	0.0	31.9	0	0.0	28.8	0	0.0	31.4	0	0.0	23.3	21.5
Middle	0	0.0	33.7	0	0.0	35.5	0	0.0	38.1	0	0.0	29.7	33.5
Upper	0	0.0	13.3	0	0.0	24.6	0	0.0	21.8	0	0.0	36.9	39.8
Unknown	0	0.0	0.1	0	0.0	0.6	0	0.0	0.4	0	0.0	0.4	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

Rated Area: State of Texas

Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
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Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 86	- Distribut	ion of 2020	and 2021	Small Bu	siness Ler	nding By R	evenue Si	ze of Busin	esses		
					Asse	ssment Ar	ea: Dalla	5					
					Bank A	and Aggreg	ate Loans I	By Year					
			2	020					2	021			Total
	Ва	ank	Agg	Bar	nk 	Agg	Ва	nk	Agg	Ban	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	17	12.0	37.3	182	1.7	23.3	21	23.1	42.3	1,755	29.2	25.7	91.7
Over \$1 Million	3	2.1		810	7.8		4	4.4		868	14.4		7.1
Revenue Unknown	122	85.9		9,418	90.5		66	72.5		3,392	56.4		1.1
Total	142	100.0		10,410	100.0		91	100.0		6,015	100.0		100.0
						By Loan	Size						
\$100,000 or Less	122	85.9	87.0	3,269	31.4	31.2	78	85.7	91.9	1,978	32.9	35.5	
\$100,001 - \$250,000	11	7.7	7.2	1,703	16.4	19.8	7	7.7	4.5	1,093	18.2	17.6	
\$250,001 - \$1 Million	9	6.3	5.7	5,438	52.2	49.0	6	6.6	3.7	2,944	48.9	46.9	
Total	142	100.0	100.0	10,410	100.0	100.0	91	100.0	100.0	6,015	100.0	100.0	
				Ву І	oan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	17	100.0		182	100.0		17	81.0		271	15.4		
\$100,001 - \$250,000	0	0.0		0	0.0		1	4.8		248	14.1		
\$250,001 - \$1 Million	0	0.0		0	0.0		3	14.3		1,236	70.4		
Total	17	100.0		182	100.0		21	100.0		1,755	100.0		

		Table 87 -	Distribut	ion of 2022	and 2023	Small Bu	siness Ler	nding By R	evenue Si	ize of Busin	esses		
					Asses	ssment Ar	ea: Dalla	S					
					Bank A	and Aggreg	ate Loans	By Year					
			2	022					2	023			Total
	Ва	nk	Agg	Bar	nk	Agg	Ва	ınk	Agg	Bar	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	16	59.3	48.6	1,890	31.1	31.9	18	60.0	51.7	2,045	50.0	32.9	92.1
Over \$1 Million	6	22.2		3,213	52.9		7	23.3		1,595	39.0		6.6
Revenue Unknown	5	18.5		976	16.1		5	16.7		449	11.0		1.2
Total	27	100.0		6,079	100.0		30	100.0		4,089	100.0		100.0
						By Loan	Size						
\$100,000 or Less	17	63.0	94.3	312	5.1	40.7	24	80.0	94.2	399	9.8	41.4	
\$100,001 - \$250,000	1	3.7	3.0	222	3.7	15.1	1	3.3	3.2	235	5.7	16.2	
\$250,001 - \$1 Million	9	33.3	2.7	5,545	91.2	44.1	5	16.7	2.6	3,455	84.5	42.3	
Total	27	100.0	100.0	6,079	100.0	100.0	30	100.0	100.0	4,089	100.0	100.0	
				Ву І	oan Size a	nd Revenu	es \$1 Milli	on or Less					
\$100,000 or Less	13	81.3		150	7.9		15	83.3		175	8.6		
\$100,001 - \$250,000	1	6.3		222	11.7		1	5.6		235	11.5		
\$250,001 - \$1 Million	2	12.5		1,518	80.3		2	11.1		1,635	80.0		
Total	16	100.0		1,890	100.0		18	100.0		2,045	100.0		

		Table	88 - Distri	bution of 20	20 and 20	21 Home	Mortgage	Lending B	y Borrowe	r Income Le	vel		
					Ass	essment A	rea: Dalla	s					
					Bank A	And Aggreg	ate Loans E	By Year					
Borrower			2020						2	021			Families by
Income Level	Ва	ank	Agg	Bar	nk	Agg	Ва	ank	Agg	Bar	nk	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purch	ase Loans						
Low	1	2.7	4.8	177	2.2	2.3	3	6.5	3.5	542	4.5	1.6	26.2
Moderate	7	18.9	17.6	1,430	17.5	11.2	6	13.0	14.4	1,210	10.0	9.1	17.1
Middle	0	0.0	21.5	0	0.0	18.2	1	2.2	17.6	252	2.1	14.6	17.1
Upper	1	2.7	46.6	94	1.2	58.5	0	0.0	43.4	0	0.0	55.9	39.6
Unknown	28	75.7	9.4	6,471	79.2	9.8	36	78.3	21.2	10,104	83.4	18.7	0.0
Total	37	100.0	100.0	8,172	100.0	100.0	46	100.0	100.0	12,108	100.0	100.0	100.0
						Refinance	Loans						
Low	1	12.5	2.9	153	10.2	1.2	0	0.0	3.8	0	0.0	1.7	26.2
Moderate	6	75.0	8.9	1,120	74.5	5.1	1	25.0	11.2	179	19.8	6.6	17.1
Middle	0	0.0	16.6	0	0.0	12.6	0	0.0	16.6	0	0.0	12.6	17.1
Upper	0	0.0	56.0	0	0.0	65.8	1	25.0	49.0	462	51.0	59.9	39.6
Unknown	1	12.5	15.6	230	15.3	15.2	2	50.0	19.4	265	29.2	19.3	0.0
Total	8	100.0	100.0	1,503	100.0	100.0	4	100.0	100.0	906	100.0	100.0	100.0
					Hor	ne Improve	ment Loan	s					
Low	0	0.0	3.8	0	0.0	2.0	0	0.0	4.2	0	0.0	2.1	26.2
Moderate	0	0.0	10.2	0	0.0	7.0	0	0.0	8.4	0	0.0	5.4	17.1
Middle	0	0.0	14.8	0	0.0	10.7	0	0.0	13.5	0	0.0	9.3	17.1
Upper	0	0.0	66.9	0	0.0	74.6	0	0.0	70.8	0	0.0	78.9	39.6
Unknown	0	0.0	4.3	0	0.0	5.8	0	0.0	3.1	0	0.0	4.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Tota	l Home Mo	rtgage Loar	ns					
Low	2	4.4	3.6	330	3.4	1.7	3	6.0	3.7	542	4.2	1.7	26.2
Moderate	13	28.9	12.1	2,550	26.4	7.6	7	14.0	12.4	1,389	10.7	7.7	17.1

Middle	0	0.0	17.9	0	0.0	14.7	1	2.0	16.8	252	1.9	13.4	17.1
Upper	1	2.2	50.4	94	1.0	61.7	1	2.0	46.6	462	3.6	58.1	39.6
Unknown	29	64.4	15.9	6,701	69.3	14.2	38	76.0	20.5	10,369	79.7	19.1	0.0
Total	45	100.0	100.0	9,675	100.0	100.0	50	100.0	100.0	13,014	100.0	100.0	100.0

		Table 89	9 - Distrib	oution of 20	20 and 2	021 Hom	e Mortgage	Lending	By Borro	wer Income	Level				
					As	sessment	: Area: Dalla	as							
					Bank A	nd Aggreg	ate Loans By	Year							
Borrower Income			2020						20	21			Families by Family		
Level	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Income %		
	#	#%	#%	\$(000)	\$%	\$%	#	# #% #%			\$%	\$%			
						Other Pu	rpose LOC								
Low															
Moderate	0	0.0	10.4	0	0.0	5.7	0	0.0	7.9	0	0.0	3.6	17.1		
Middle	0	0.0	14.9	0	0.0	9.4	0	0.0	10.5	0	0.0	6.0	17.1		
Upper	0	0.0	66.7	0	0.0	77.4	0	0.0	70.3	0	0.0	82.0	39.6		
Unknown	0	0.0	2.0	0	0.0	4.5	0	0.0	4.1	0	0.0	4.8	0.0		
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0		
					Othe	er Purpose	Closed/Exer	npt							
Low	0	0.0	5.8	0	0.0	1.8	0	0.0	6.5	0	0.0	2.0	26.2		
Moderate	0	0.0	10.2	0	0.0	4.5	0	0.0	13.1	0	0.0	4.3	17.1		
Middle	0	0.0	13.3	0	0.0	6.3	0	0.0	12.7	0	0.0	5.6	17.1		
Upper	0	0.0	58.9	0	0.0	71.4	0	0.0	57.7	0	0.0	76.3	39.6		
Unknown	0	0.0	11.8	0	0.0	16.0	0	0.0	10.0	0	0.0	11.8	0.0		
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0		
					Р	urpose No	ot Applicable								
Low	0	0.0	0.6	0	0.0	0.4	0	0.0	1.2	0	0.0	0.6	26.2		
Moderate	0	0.0	0.5	0	0.0	0.4	0	0.0	0.8	0	0.0	0.7	17.1		
Middle	0	0.0	0.3	0	0.0	0.5	0	0.0	0.3	0	0.0	0.3	17.1		

Rated Area: State of Texas

Upper	0	0.0	0.4	0	0.0	0.9	0	0.0	0.2	0	0.0	0.3	39.6
Unknown	0	0.0	98.3	0	0.0	97.9	0	0.0	97.6	0	0.0	98.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table	90 - Distri	bution of 20		23 Home I essment A			y Borrowe	r Income Le	vel		
					Bank A	And Aggreg	ate Loans E	By Year					
Borrower			2022			_			2	023		T	Families by Family
Income Level	Ва	nk	Agg	Bank		Agg	Ва	nk	Agg	Bar	ık	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purch	ase Loans						
Low	5	9.1	2.5	1,062	5.4	1.0	10	8.7	2.4	1,953	5.6	1.1	23.4
Moderate	11	20.0	12.4	3,041	15.5	7.2	30	26.1	12.2	8,366	24.1	7.7	17.7
Middle	8	14.5	18.5	2,644	13.5	14.6	12	10.4	19.1	3,671	10.6	15.6	19.1
Upper	5	9.1	47.1	1,870	9.5	59.9	18	15.7	39.5	7,580	21.9	50.5	39.8
Unknown	26	47.3	19.5	11,031	56.1	17.3	45	39.1	26.8	13,121	37.8	25.1	0.0
Total	55	100.0	100.0	19,648	100.0	100.0	115	100.0	100.0	34,691	100.0	100.0	100.0
		1	l .		l .	Refinance	Loans		l .			l .	ll
Low	10	28.6	8.9	1,637	21.7	4.1	2	13.3	9.0	293	6.5	4.4	23.4
Moderate	11	31.4	16.8	1,976	26.2	10.1	7	46.7	16.3	1,499	33.5	9.2	17.7
Middle	5	14.3	19.5	991	13.2	14.9	4	26.7	19.9	748	16.7	14.2	19.1
Upper	5	14.3	41.8	1,864	24.8	56.3	1	6.7	39.4	1,504	33.6	51.8	39.8
Unknown	4	11.4	12.9	1,061	14.1	14.6	1	6.7	15.5	430	9.6	20.5	0.0
Total	35	100.0	100.0	7,529	100.0	100.0	15	100.0	100.0	4,474	100.0	100.0	100.0
		I.	ı	•	Hor	ne Improve	ment Loan	s	ı	· ·	ı	ı	Ш
Low	0	0.0	5.0	0	0.0	2.8	0	0.0	5.7	0	0.0	2.9	23.4
Moderate	0	0.0	8.9	0	0.0	5.3	0	0.0	11.3	0	0.0	5.9	17.7

Middle	0	0.0	14.2	0	0.0	9.6	0	0.0	18.4	0	0.0	11.7	19.1
Upper	0	0.0	68.9	0	0.0	78.0	0	0.0	61.3	0	0.0	73.0	39.8
Unknown	0	0.0	3.0	0	0.0	4.3	1	100.0	3.4	218	100.0	6.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	218	100.0	100.0	100.0
					Tota	Home Mo	rtgage Loar	ıs					
Low	17	17.9	4.5	2,994	10.1	1.8	12	9.1	3.5	2,246	5.7	1.5	23.4
Moderate	22	23.2	13.3	5,017	16.8	7.7	38	28.8	12.7	9,963	25.2	7.8	17.7
Middle	13	13.7	18.2	3,635	12.2	14.3	16	12.1	19.1	4,419	11.2	15.3	19.1
Upper	10	10.5	46.3	3,734	12.5	59.6	19	14.4	40.5	9,084	23.0	51.1	39.8
Unknown	33	34.7	17.7	14,397	48.3	16.5	47	35.6	24.2	13,769	34.9	24.4	0.0
Total	95	100.0	100.0	29,777	100.0	100.0	132	100.0	100.0	39,481	100.0	100.0	100.0

		Table 91	- Distrib	ution of 202	22 and 20)23 Home	Mortgage	Lending I	By Borrov	ver Income	Level				
					Ass	essment	Area: Dalla	s							
					Bank A	nd Aggreg	ate Loans By	Year							
Borrower Income			2022						20	23			Families by Family		
Level	Ban	k	Agg	Ban	k	Agg	Ban	ık	Agg	Ban	k	Agg	Income %		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%			
						Other Pur	pose LOC								
Low															
Moderate	0	0.0	6.7	0	0.0	3.7	0	0.0	11.6	0	0.0	5.7	17.7		
Middle	0	0.0	11.9	0	0.0	7.2	0	0.0	18.9	0	0.0	11.0	19.1		
Upper	0	0.0	72.5	0	0.0	82.0	0	0.0	60.5	0	0.0	75.4	39.8		
Unknown	0	0.0	5.1	0	0.0	4.8	0	0.0	2.0	0	0.0	3.5	0.0		
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0		
					Othe	r Purpose	Closed/Exem	npt							
Low	2	40.0	8.1	295	11.3	3.5	0	0.0	7.5	0	0.0	2.8	23.4		
Moderate	0	0.0	12.1	0	0.0	5.1	1	100.0	16.5	98	100.0	7.1	17.7		
Middle	0	0.0	16.1	0	0.0	7.4	0	0.0	22.1	0	0.0	10.4	19.1		
Upper	0	0.0	57.0	0	0.0	73.5	0	0.0	45.8	0	0.0	56.0	39.8		

Rated Area: State of Texas

Unknown	3	60.0	6.7	2,305	88.7	10.4	0	0.0	8.1	0	0.0	23.7	0.0
Total	5	100.0	100.0	2,600	100.0	100.0	1	100.0	100.0	98	100.0	100.0	100.0
					Pu	ırpose No	t Applicable						
Low	0	0.0	0.6	0	0.0	0.5	0	0.0	2.9	0	0.0	1.1	23.4
Moderate	0	0.0	0.5	0	0.0	0.5	0	0.0	1.4	0	0.0	1.1	17.7
Middle	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	0	0.0	0.1	19.1
Upper	0	0.0	0.1	0	0.0	0.7	0	0.0	0.4	0	0.0	0.9	39.8
Unknown	0	0.0	98.5	0	0.0	97.9	0	0.0	95.2	0	0.0	96.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Table 92 – Qualified Investments													
			Assessme	nt Area: State o	f Texas									
Assessment Areas	Prior Period	Investments	Current Perio	d Investments	Т	otal Investment	ts	Unfunded Co	ommitments					
Assessment Areas	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)					
Full Scope														
Houston	10	43,155	61	35,502	71	78,657	26.2	-	-					
Statewide/Regional	13	34,092	10	49,649	23	83,741	27.8	-	-					
Limited Scope														
Dallas	8	51,235	31	86,886	39	138,121	46.0	-	-					

			Т	able 93	B – Distr	ributio	n of Bra	anch Delive	ry Systems	1							
	Deposits		В	ranches	5				Branch Ope	enings /	Closin	gs			Popu	ation	
Assessment Areas	Area	# of Bank Branches	% of Rated Area	Rated In			•	# of Branch	# of Branch		•	in Locat es (+ or		% of Households within each Geography			
	Deposits in AA	branches	Branches in AA	Low	Mod	Mid	Upp	Openings	Closings	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope																	
Houston	84.0	9	75	44.4	11.1	0.0	44.3	0	0	0	0	0	0	13.2	25.3	26.7	33.0
Limited Scope																	
Dallas	16.0	3	25	0.0	33.3	33.3	33.3	0	0	0	0	0	0	9.1	25.6	32.0	32.0

Rated Area: State of Washington

Table 94 – Lending Volume of Reported Loans

Retail Lending Evaluation: January 1, 2020 to December 31, 2023

Community Development Lending Evaluation Period: January 1, 2021 to August 12, 2024

Assessment Area: Washington

	% of Rated	Small E	Business Loans	Small	Farm Loans	All HN	/IDA Loans		ommunity opment Loans	Total R	eported Loans	% of Rated
Assessment Areas	Area Loans	#	\$ (000's)	#	\$ (000's)	#	\$ (000's) #		\$ (000's)	#	\$ (000's)	Area Deposits
Full Scope												
Washington	100	323	55,685	0	0	1,384	998,359	31	159,627	1,738	1,213,671	100
Statewide/Regional								24	71,849			

					Assess	ment Are	a: Washin	gton					
					Bank A	And Aggreg	ate Loans E	By Year					
Geographic	eographic 2020 2021												Total
Income Level	Ва	ank	Agg	Ban	ık	Agg	Ва	nk	Agg	Ban	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	19	12.5	5.9	3,402	14.3	7.7	9	9.7	5.9	2,320	15.0	8.2	5.1
Moderate	30	19.7	16.4	4,907	20.6	15.5	15	16.1	17.2	2,087	13.5	16.0	16.3
Middle	40	26.3	35.7	6,657	27.9	34.6	22	23.7	36.1	3,430	22.2	35.6	35.5
Upper	61	40.1	41.0	8,492	35.6	41.0	46	49.5	39.7	7,395	47.8	39.2	42.6

0.9

0.3

100.0

1

0

93

1.1

0.0

100.0

0.5

0.5

100.0

234

0

15,466

1.5

0.0

100.0

0.9

0.1

100.0

0.5

100.0

1.5

0.0

100.0

369

0

23,827

2

0

152

1.3

0.0

100.0

0.6

0.4

100.0

Unknown

Tract-Unk

Total

Table 95 - Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography

Table 96 - Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography
Assessment Area: Washington

					Bank A	And Aggreg	ate Loans E	By Year					
Geographic			2	022					2	023			Total
Income Level	Ва	ank	Agg	Ban	ık	Agg	Ва	nk	Agg	Ban	k	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	2	8.0	6.1	20	0.3	8.6	7	13.2	5.6	1,025	9.9	9.0	6.0
Moderate	1	4.0	16.4	30	0.5	13.9	2	3.8	15.2	253	2.4	13.7	15.2
Middle	8	32.0	34.2	2,167	35.9	35.7	18	34.0	34.1	1,818	17.5	34.8	35.1
Upper	14	56.0	41.2	3,812	63.2	40.1	24	45.3	43.2	6,328	61.1	40.6	42.0
Unknown	0	0.0	1.6	0	0.0	1.6	2	3.8	1.6	939	9.1	1.7	1.7
Tract-Unk	0	0.0	0.4	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
Total	25	100.0	100.0	6,029	100.0	100.0	53	100.0	100.0	10,363	100.0	100.0	100.0

		Table 97	' - Distribu	ition of 2020	and 2021	Home M	ortgage Lo	ending By	Income L	evel of Geogr	aphy			
					Assess	ment Area	a: Washin	gton						
	Bank And Aggregate Loans By Year													
Geographic	Geographic 2020 2021													
Income Level Rank Δσσ Rank Δσσ Rank Δσσ Rank Δσσ											Occupied Units %			
Home Purchase Loans														
Low	7	2.5	2.7	2,322	1.5	1.6	5	2.1	2.6	1,651	1.0	1.5	2.7	
Moderate	45	16.2	16.6	15,377	10.0	11.7	34	14.0	16.5	16,561	9.6	11.2	15.2	
Middle	91	32.9	42.2	36,948	23.9	37.4	73	30.2	41.6	44,064	25.7	36.7	40.4	
Upper	134	48.4	38.4	99,845	64.6	49.3	130	53.7	39.2	109,490	63.7	50.4	41.7	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.1	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
Total	277	100.0	100.0	154,492	100.0	100.0	242	100.0	100.0	171,766	100.0	100.0	100.0	

Refinance Loans													
Low	2	2.6	1.9	463	1.2	1.4	13	12.0	2.2	4,953	9.9	1.5	2.7
Moderate	18	23.1	13.3	5,426	13.5	10.1	31	28.7	14.3	9,148	18.3	10.3	15.2
Middle	28	35.9	41.2	10,890	27.2	37.3	37	34.3	40.2	14,233	28.4	35.3	40.4
Upper	30	38.5	43.6	23,300	58.1	51.2	27	25.0	43.4	21,775	43.5	52.9	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	78	100.0	100.0	40,079	100.0	100.0	108	100.0	100.0	50,109	100.0	100.0	100.0
					Hon	ne Improve	ment Loar	ns					
Low	0	0.0	1.8	0	0.0	1.1	0	0.0	1.7	0	0.0	1.7	2.7
Moderate	0	0.0	12.2	0	0.0	9.7	4	20.0	11.7	1,690	15.6	8.1	15.2
Middle	1	20.0	41.1	100	2.6	36.0	8	40.0	42.2	3,494	32.2	35.2	40.4
Upper	4	80.0	44.9	3,789	97.4	53.3	8	40.0	44.3	5,654	52.2	54.8	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	3,889	100.0	100.0	20	100.0	100.0	10,838	100.0	100.0	100.0
						Multifam	nily Loans						Multi-family Units %
Low	0	0.0	6.8	0	0.0	13.7	0	0.0	5.6	0	0.0	7.1	7.3
Moderate	0	0.0	23.5	0	0.0	18.0	1	12.5	25.5	2,700	7.0	31.7	24.5
Middle	2	66.7	35.1	12,840	94.0	32.4	4	50.0	37.1	21,385	55.2	31.7	33.2
Upper	1	33.3	34.4	825	6.0	35.9	3	37.5	31.5	14,635	37.8	29.3	34.3
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.4	0	0.0	0.2	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	13,665	100.0	100.0	8	100.0	100.0	38,720	100.0	100.0	100.0
					Tot	al Home M	lortgage Lo	pans					Owner Occupied Units %
Low	9	2.4	2.1	2,785	1.3	1.9	18	4.6	2.3	6,604	2.4	1.7	2.7
Moderate	66	17.7	14.0	21,509	9.9	10.8	73	18.7	14.8	31,193	11.2	11.4	15.2
Middle	123	33.0	41.3	61,078	28.2	37.0	126	32.3	40.6	84,434	30.4	35.5	40.4

Upper	175	46.9	42.6	130,908	60.5	50.4	173	44.4	42.4	155,743	56.0	51.4	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	373	100.0	100.0	216,280	100.0	100.0	390	100.0	100.0	277,974	100.0	100.0	100.0

		Table 98	- Distribu	tion of 202			Mortgage L	_	y Income	Level of Ge	eography		
	l						ate Loans By						
Geographic			20)20		- 55		•	20	21			Owner Occupied
Income Level	Baı	nk	Agg	Ban	ık	Agg	Bar	ık	Agg	Ban	ık	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	•	1	•		•	Other Pu	rpose LOC	•	•		•		
Low	0	0.0	1.5	0	0.0	0.9	0	0.0	1.4	0	0.0	0.8	2.7
Moderate	3	50.0	11.0	706	39.1	6.9	3	27.3	10.3	1,094	17.6	6.4	15.2
Middle	0	0.0	36.3	0	0.0	29.5	3	27.3	38.5	928	14.9	31.3	40.4
Upper	3	50.0	51.2	1,099	60.9	62.7	5	45.5	49.8	4,189	67.4	61.5	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	1,805	100.0	100.0	11	100.0	100.0	6,211	100.0	100.0	100.0
					Oth	er Purpose	Closed/Exe	mpt					
Low	0	0.0	2.2	0	0.0	0.7	0	0.0	1.0	0	0.0	0.3	2.7
Moderate	0	0.0	13.8	0	0.0	6.7	0	0.0	11.3	0	0.0	4.3	15.2
Middle	1	25.0	37.1	300	12.8	24.4	1	100.0	34.5	330	100.0	23.8	40.4
Upper	3	75.0	46.9	2,050	87.2	68.2	0	0.0	53.1	0	0.0	71.6	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	2,350	100.0	100.0	1	100.0	100.0	330	100.0	100.0	100.0
					F	Purpose No	ot Applicable	•					
Low	0	0.0	3.7	0	0.0	2.0	0	0.0	4.3	0	0.0	2.6	2.7

Rated Area: State of Washington

Moderate	0	0.0	19.9	0	0.0	11.7	0	0.0	27.8	0	0.0	21.3	15.2
Middle	0	0.0	40.2	0	0.0	33.1	0	0.0	43.1	0	0.0	39.5	40.4
Upper	0	0.0	36.2	0	0.0	53.2	0	0.0	24.7	0	0.0	36.6	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 99	9 - Distribu	ution of 2022	and 2023	Home Mo	ortgage Le	ending By	Income Le	vel of Geogr	aphy		
					Assessr	ment Area	: Washing	gton					
					Bank A	nd Aggrega	ate Loans B	y Year					
Geographic	Geographic 2022 2023											Owner	
Income Level	Ba	ınk	Agg	Ban	k	Agg	Ва	nk	Agg	Ban	k	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	Gines 75
Home Purchase Loans													
Low	5	2.1	3.0	2,422	1.0	1.7	11	5.4	3.1	4,088	3.3	2.0	2.5
Moderate	22	9.2	16.4	10,185	4.1	10.8	49	24.3	17.5	21,380	17.1	11.7	16.0
Middle	81	33.9	37.5	54,189	22.0	32.8	68	33.7	37.3	38,375	30.7	33.1	36.9
Upper	130	54.4	42.1	178,384	72.6	53.7	73	36.1	41.1	60,663	48.5	52.4	43.8
Unknown	1	0.4	1.1	660	0.3	1.0	1	0.5	1.0	600	0.5	0.8	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	239	100.0	100.0	245,840	100.0	100.0	202	100.0	100.0	125,106	100.0	100.0	100.0
						Refinance	Loans						
Low	4	3.9	2.5	1,362	1.7	1.5	4	11.4	3.1	1,175	9.3	1.5	2.5
Moderate	22	21.4	17.5	7,774	9.5	11.6	14	40.0	18.1	4,152	32.7	11.8	16.0
Middle	33	32.0	37.0	21,755	26.6	30.2	10	28.6	37.2	4,331	34.2	35.2	36.9

Upper	43	41.7	42.6	50,202	61.4	56.2	7	20.0	41.1	3,021	23.8	51.1	43.8
Unknown	1	1.0	0.5	695	0.8	0.5	0	0.0	0.5	0	0.0	0.4	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.7
Total	103	100.0	100.0	81,788	100.0	100.0	35	100.0	100.0	12,679	100.0	100.0	100.0
1000	1 200	100.0	200.0	02), 00		ne Improve			200.0	12,070	100.0	200.0	200.0
Low	0	0.0	1.8	0	0.0	1.0	0	0.0	2.3	0	0.0	1.6	2.5
Moderate	1	16.7	13.6	100	2.5	8.9	0	0.0	17.6	0	0.0	10.9	16.0
Middle	3	50.0	38.4	1,651	40.9	31.1	5	50.0	38.9	2,000	45.8	31.6	36.9
Upper	2	33.3	45.8	2,286	56.6	58.6	5	50.0	40.7	2,371	54.2	55.3	43.8
Unknown	0	0.0	0.4	0	0.0	0.4	0	0.0	0.5	0	0.0	0.5	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	4,037	100.0	100.0	10	100.0	100.0	4,371	100.0	100.0	100.0
	•					Multifam	ily Loans						Multi-family Units %
Low	2	16.7	5.8	3,650	14.6	7.1	1	100.0	7.0	1,900	100.0	5.0	8.0
Moderate	2	16.7	16.5	5,500	22.0	21.5	0	0.0	17.6	0	0.0	18.4	19.0
Middle	4	33.3	37.2	4,743	19.0	39.7	0	0.0	35.2	0	0.0	42.4	33.8
Upper	3	25.0	34.5	4,880	19.5	29.3	0	0.0	33.5	0	0.0	26.2	33.9
Unknown	1	8.3	6.0	6,250	25.0	2.5	0	0.0	6.6	0	0.0	8.1	5.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	25,023	100.0	100.0	1	100.0	100.0	1,900	100.0	100.0	100.0
					Tota	al Home M	ortgage Lo	ans					Owner Occupied Units %
Low	11	3.0	2.6	7,434	2.1	2.1	16	6.3	3.0	7,163	4.9	2.2	2.5
Moderate	48	13.1	16.1	23,774	6.6	11.8	65	25.6	17.5	26,017	17.9	12.3	16.0
Middle	124	33.8	37.3	83,480	23.3	32.5	86	33.9	37.6	45,209	31.1	34.2	36.9
Upper	181	49.3	43.2	236,408	65.9	52.7	86	33.9	41.1	66,415	45.7	49.7	43.8
Unknown	3	0.8	0.8	7,605	2.1	1.0	1	0.4	0.8	600	0.4	1.6	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	367	100.0	100.0	358,701	100.0	100.0	254	100.0	100.0	145,404	100.0	100.0	100.0

Rated Area: State of Washington

Table 100 - Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography **Assessment Area: Washington Bank And Aggregate Loans By Year** 2022 2023 **Owner Occupied** Geographic Income Level Units % Bank Bank Bank Bank Agg Agg Agg Agg # #% #% \$(000) \$% \$% #% #% \$(000) \$% \$% Other Purpose LOC 0 0.0 1.6 0 0.0 0.0 2.6 0 0.0 1.4 2.5 Low 1.0 Moderate 1 33.3 13.6 215 22.4 8.2 0 0.0 16.5 0 0.0 9.4 16.0 Middle 1 33.3 36.4 567 59.1 28.4 1 100.0 39.5 77 100.0 34.7 36.9 33.3 47.8 18.5 0 41.0 0.0 Upper 1 177 61.8 0.0 0 54.1 43.8 Unknown 0 0.0 0.6 0 0.0 0.6 0 0.0 0.4 0 0.0 0.4 0.7 Tract-Unk 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0.0 3 100.0 100.0 100.0 1 77 100.0 100.0 Total 100.0 959 100.0 100.0 100.0 Other Purpose Closed/Exempt 0 0.0 1.8 0 0.0 0 0.0 1.6 0 0.0 0.6 2.5 Low 8.0 Moderate 0 0.0 14.0 0 0.0 4.8 2 40.0 18.7 485 38.2 6.7 16.0

Middle	2	50.0	30.9	575	54.6	18.9	2	40.0	35.5	426	33.5	19.4	36.9		
Upper	2	50.0	52.6	479	45.4	74.9	1	20.0	43.2	360	28.3	72.2	43.8		
Unknown	0	0.0	0.6	0	0.0	0.6	0	0.0	1.0	0	0.0	1.2	0.7		
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Total	4	100.0	100.0	1,054	100.0	100.0	5	100.0	100.0	1,271	100.0	100.0	100.0		
	Purpose Not Applicable														
Low	0	0.0	5.2	0	0.0	3.6	0	0.0	2.2	0	0.0	29.7	2.5		
Moderate	0	0.0	25.2	0	0.0	17.3	0	0.0	21.5	0	0.0	8.1	16.0		
Middle	0	0.0	27.8	0	0.0	23.6	0	0.0	32.3	0	0.0	27.3	36.9		
Upper	0	0.0	40.9	0	0.0	54.6	0	0.0	43.0	0	0.0	34.9	43.8		

0

0

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0.0

Unknown

Tract-Unk

0

0

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0.0

0.9

0.0

0

0

0.0

0.0

Rated Area: State of Washington

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 101	- Distribu	tion of 2020			usiness Le : Washing		Revenue S	ize of Busin	iesses		
							ate Loans						
			2	020				-	2	021			Total
	Ва	ank	Agg	Bar	nk	Agg	Ва	ınk	Agg	Bar	nk	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
		•			1	By Reve	nue	•			1		
\$1 Million or Less	11	7.2	41.9	2,110	8.9	23.5	20	21.5	48.9	2,805	18.1	26.9	92.7
Over \$1 Million	4	2.6		1,403	5.9		14	15.1		4,329	28.0		6.5
Revenue Unknown	137	90.1		20,314	85.3		59	63.4		8,332	53.9		0.8
Total	152	100.0		23,827	100.0		93	100.0		15,466	100.0		100.0
		•			•	By Loan	Size	•			•		
\$100,000 or Less	92	60.5	86.3	3,435	14.4	30.4	56	60.2	91.5	2,360	15.3	34.2	
\$100,001 - \$250,000	30	19.7	7.8	5,498	23.1	20.3	16	17.2	4.7	2,889	18.7	17.9	
\$250,001 - \$1 Million	30	19.7	6.0	14,894	62.5	49.3	21	22.6	3.9	10,217	66.1	47.9	
Total	152	100.0	100.0	23,827	100.0	100.0	93	100.0	100.0	15,466	100.0	100.0	
				Ву І	oan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	8	72.7		90	4.3		15	75.0		432	15.4		
\$100,001 - \$250,000	0	0.0		0	0.0		3	15.0		483	17.2		
\$250,001 - \$1 Million	3	27.3		2,020	95.7		2	10.0		1,890	67.4		
Total	11	100.0		2,110	100.0		20	100.0		2,805	100.0		

Rated Area: State of Washington

Table 102 - Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses **Assessment Area: Washington** Bank And Aggregate Loans By Year 2022 2023 Total Bank Bank Agg Bank Agg Agg Bank Agg **Businesses %** \$(000) \$% \$% # #% #% \$(000) \$% # #% #% \$% By Revenue \$1 Million or Less 14 56.0 53.7 1,142 18.9 33.4 26 49.1 56.5 1,742 16.8 33.2 93.2 Over \$1 Million 4 9 1,090 906 8.7 16.0 18.1 17.0 6.0 7 Revenue Unknown 28.0 3,797 63.0 18 34.0 7,715 74.4 8.0 Total 25 100.0 6,029 100.0 53 100.0 10,363 100.0 100.0 By Loan Size 15 95.1 232 64.2 95.7 \$100,000 or Less 60.0 3.8 42.6 422 4.1 46.3 \$100,001 - \$250,000 5 20.0 2.4 1,250 20.7 13.1 7 13.2 2.2 1,438 13.9 13.0 \$250,001 - \$1 5 20.0 2.4 4,547 75.4 44.4 12 22.6 2.1 8,503 82.1 40.7 Million 25 100.0 100.0 Total 100.0 100.0 6,029 53 100.0 100.0 10,363 100.0 100.0 By Loan Size and Revenues \$1 Million or Less 13 92.9 \$100,000 or Less 142 12.4 23 88.5 201 11.5 \$100,001 - \$250,000 0 0.0 0 7.2 0.0 1 3.8 126 \$250,001 - \$1 1,000 87.6 2 1 7.1 7.7 1,415 81.2

26

100.0

1,742

100.0

Million Total

14

100.0

1,142

100.0

Rated Area: State of Washington

Table 103 - Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level

Assessment Area: Washington

					A33C33	illelit Ale	a. vvasiiiii	gton					
					Bank	And Aggreg	ate Loans E	By Year					
Borrower			2020						2	2021			Families by
Income Level	Ва	ınk	Agg	Ban	ık	Agg	Ва	ınk	Agg	Ban	k	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	lome Purch	ase Loans						
Low	2	0.7	3.5	431	0.3	1.5	6	2.5	3.2	2,931	1.7	1.3	21.0
Moderate	3	1.1	14.8	911	0.6	9.0	14	5.8	12.4	5,258	3.1	6.9	16.4
Middle	0	0.0	21.8	0	0.0	17.7	4	1.7	19.7	2,030	1.2	14.9	19.5
Upper	0	0.0	54.2	0	0.0	65.8	1	0.4	53.3	650	0.4	65.4	43.1
Unknown	272	98.2	5.7	153,150	99.1	6.0	217	89.7	11.5	160,897	93.7	11.5	0.0
Total	277	100.0	100.0	154,492	100.0	100.0	242	100.0	100.0	171,766	100.0	100.0	100.0
						Refinance	Loans						
Low	5	6.4	4.3	1,299	3.2	2.4	18	16.7	5.1	4,400	8.8	2.5	21.0
Moderate	15	19.2	13.5	3,926	9.8	9.1	33	30.6	14.2	10,335	20.6	9.1	16.4
Middle	0	0.0	22.3	0	0.0	19.0	2	1.9	20.0	848	1.7	16.2	19.5
Upper	0	0.0	51.3	0	0.0	60.6	0	0.0	48.5	0	0.0	59.2	43.1
Unknown	58	74.4	8.6	34,854	87.0	8.9	55	50.9	12.3	34,526	68.9	13.0	0.0
Total	78	100.0	100.0	40,079	100.0	100.0	108	100.0	100.0	50,109	100.0	100.0	100.0
					Hor	me Improve	ement Loan	s					
Low	0	0.0	4.9	0	0.0	3.0	0	0.0	3.4	0	0.0	2.1	21.0
Moderate	0	0.0	13.2	0	0.0	8.6	0	0.0	11.7	0	0.0	8.0	16.4
Middle	0	0.0	23.5	0	0.0	18.5	0	0.0	21.6	0	0.0	16.2	19.5
Upper	0	0.0	56.3	0	0.0	64.7	0	0.0	60.8	0	0.0	67.7	43.1
Unknown	5	100.0	2.1	3,889	100.0	5.2	20	100.0	2.5	10,838	100.0	6.0	0.0
Total	5	100.0	100.0	3,889	100.0	100.0	20	100.0	100.0	10,838	100.0	100.0	100.0
		•	•		Tota	l Home Mo	rtgage Loai	ns	•		•		
Low	8	2.2	4.1	1,980	1.0	2.1	24	6.3	4.4	7,331	3.1	2.0	21.0
Moderate	18	4.9	13.7	4,837	2.4	9.0	47	12.3	13.4	15,593	6.5	8.2	16.4

Middle	0	0.0	22.0	0	0.0	18.4	6	1.6	19.8	2,878	1.2	15.5	19.5
Upper	0	0.0	52.1	0	0.0	62.1	1	0.3	50.8	650	0.3	62.0	43.1
Unknown	344	93.0	8.2	195,798	96.6	8.4	304	79.6	11.5	212,802	88.9	12.3	0.0
Total	370	100.0	100.0	202,615	100.0	100.0	382	100.0	100.0	239,254	100.0	100.0	100.0

	Table 104 - Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level														
					Assess	ment Are	ea: Washing	gton							
					Bank A	nd Aggreg	ate Loans By	Year							
Borrower Income			2020						20	21			Families by Family		
Level	Bar	nk	Agg	Ban	ık	Agg	Ban	ık	Agg	Bar	ık	Agg	Income %		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%			
	Other Purpose LOC														
Low	0	0.0	4.4	0	0.0	2.1	0	0.0	3.2	0	0.0	1.8	21.0		
Moderate	0	0.0	12.2	0	0.0	6.9	0	0.0	11.0	0	0.0	6.2	16.4		
Middle	0	0.0	19.9	0	0.0	14.5	0	0.0	17.8	0	0.0	12.1	19.5		
Upper	0	0.0	61.2	0	0.0	73.7	0	0.0	65.1	0	0.0	76.2	43.1		
Unknown	6	100.0	2.2	1,805	100.0	2.8	11	100.0	2.9	6,211	100.0	3.7	0.0		
Total	6	100.0	100.0	1,805	100.0	100.0	11	100.0	100.0	6,211	100.0	100.0	100.0		
					Othe	r Purpose	Closed/Exen	npt							
Low	1	25.0	6.0	250	10.6	3.2	0	0.0	5.6	0	0.0	2.0	21.0		
Moderate	0	0.0	15.3	0	0.0	6.6	0	0.0	11.7	0	0.0	4.4	16.4		
Middle	0	0.0	19.2	0	0.0	11.7	0	0.0	14.3	0	0.0	6.8	19.5		
Upper	0	0.0	52.3	0	0.0	66.7	0	0.0	60.2	0	0.0	76.9	43.1		
Unknown	3	75.0	7.2	2,100	89.4	11.8	1	100.0	8.2	330	100.0	9.9	0.0		
Total	4	100.0	100.0	2,350	100.0	100.0	1	100.0	100.0	330	100.0	100.0	100.0		
					P	urpose No	t Applicable								
Low	0	0.0	0.4	0	0.0	0.2	0	0.0	0.8	0	0.0	0.5	21.0		
Moderate	0	0.0	0.7	0	0.0	0.4	0	0.0	0.8	0	0.0	0.5	16.4		
Middle	0	0.0	0.5	0	0.0	0.5	0	0.0	0.4	0	0.0	0.5	19.5		

Rated Area: State of Washington

Upper	0	0.0	0.5	0	0.0	0.6	0	0.0	0.8	0	0.0	1.0	43.1
Unknown	0	0.0	98.0	0	0.0	98.3	0	0.0	97.3	0	0.0	97.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

		Table	105 - Dist	ribution of 20		23 Home ment Area		_	y Borrowe	er Income Le	vel		
					Bank A	and Aggrega	ate Loans B	y Year					
Borrower			2022						2	.023			Families by
Income Level	Ва	ınk	Agg	Ban	k	Agg	Ва	nk	Agg	Ban	ık	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	111001110 70
		•			Н	ome Purcha	se Loans				•		11
Low	3	1.3	3.3	1,083	0.4	1.1	18	8.9	3.3	5,299	4.2	1.2	20.0
Moderate	2	0.8	11.6	944	0.4	6.0	29	14.4	11.9	13,066	10.4	6.4	16.6
Middle	6	2.5	21.4	3,675	1.5	15.9	13	6.4	21.2	7,906	6.3	15.7	19.8
Upper	0	0.0	52.6	0	0.0	65.6	5	2.5	49.5	2,988	2.4	62.9	43.6
Unknown	228	95.4	11.2	240,138	97.7	11.4	137	67.8	14.0	95,847	76.6	13.8	0.0
Total	239	100.0	100.0	245,840	100.0	100.0	202	100.0	100.0	125,106	100.0	100.0	100.0
						Refinance	Loans						
Low	12	11.7	11.3	3,227	3.9	6.3	4	11.4	9.4	932	7.4	3.4	20.0
Moderate	8	7.8	17.4	2,399	2.9	11.1	7	20.0	17.0	1,955	15.4	6.7	16.6
Middle	0	0.0	20.6	0	0.0	16.4	1	2.9	19.3	342	2.7	8.9	19.8
Upper	1	1.0	39.8	1,106	1.4	53.1	0	0.0	38.9	0	0.0	32.8	43.6
Unknown	82	79.6	10.8	75,056	91.8	13.1	23	65.7	15.4	9,450	74.5	48.1	0.0
Total	103	100.0	100.0	81,788	100.0	100.0	35	100.0	100.0	12,679	100.0	100.0	100.0

					Hom	e Improve	ment Loans								
Low	0	0.0	4.4	0	0.0	2.7	0	0.0	6.0	0	0.0	3.2	20.0		
Moderate	0	0.0	14.0	0	0.0	8.4	0	0.0	16.1	0	0.0	9.5	16.6		
Middle	0	0.0	23.9	0	0.0	17.9	0	0.0	26.4	0	0.0	20.5	19.8		
Upper	0	0.0	54.7	0	0.0	67.8	0	0.0	47.2	0	0.0	61.8	43.6		
Unknown	6	100.0	3.0	4,037	100.0	3.2	10	100.0	4.2	4,371	100.0	5.0	0.0		
Total	6	100.0	100.0	4,037	100.0	100.0	10	100.0	100.0	4,371	100.0	100.0	100.0		
	Total Home Mortgage Loans														
Low	17	4.8	5.9	4,580	1.4	2.6	24	9.5	5.0	6,516	4.5	1.7	20.0		
Moderate	10	2.8	13.6	3,343	1.0	7.4	37	14.6	13.7	15,381	10.7	6.6	16.6		
Middle	6	1.7	21.6	3,675	1.1	16.0	14	5.5	21.7	8,248	5.7	14.7	19.8		
Upper	1	0.3	49.3	1,106	0.3	62.7	5	2.0	46.9	2,988	2.1	57.7	43.6		
Unknown	321	90.4	9.6	320,974	96.2	11.3	173	68.4	12.7	110,371	76.9	19.2	0.0		
Total	355	100.0	100.0	333,678	100.0	100.0	253	100.0	100.0	143,504	100.0	100.0	100.0		

	Table 106 - Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level Assessment Area: Washington														
					Bank A	nd Aggreg	ate Loans By	Year							
Borrower Income	Sorrower Income 2022 2023														
Level	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Income %		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%			
	Other Purpose LOC														
Low	0	0.0	5.1	0	0.0	2.6	0	0.0	7.6	0	0.0	3.9	20.0		
Moderate	0	0.0	12.6	0	0.0	6.8	0	0.0	16.8	0	0.0	9.0	16.6		
Middle	0	0.0	23.5	0	0.0	17.0	0	0.0	23.6	0	0.0	17.4	19.8		
Upper	0	0.0	54.5	0	0.0	69.6	0	0.0	44.4	0	0.0	62.2	43.6		
Unknown	3	100.0	4.3	959	100.0	4.0	1	100.0	7.6	77	100.0	7.4	0.0		
Total	3	100.0	100.0	959	100.0	100.0	1	100.0	100.0	77	100.0	100.0	100.0		

Rated Area: State of Washington

					Othe	r Purpose	Closed/Exem	pt						
Low	2	50.0	6.7	270	25.6	3.0	2	40.0	10.7	285	22.4	2.9	20.0	
Moderate	0	0.0	11.6	0	0.0	4.2	1	20.0	18.1	360	28.3	5.5	16.6	
Middle	0	0.0	18.1	0	0.0	8.5	0	0.0	20.2	0	0.0	9.8	19.8	
Upper	0	0.0	54.1	0	0.0	75.3	0	0.0	36.8	0	0.0	51.9	43.6	
Unknown	2	50.0	9.6	784	74.4	8.9	2	40.0	14.2	626	49.3	29.8	0.0	
Total	4	100.0	100.0	1,054	100.0	100.0	5	100.0	100.0	1,271	100.0	100.0	100.0	
	Purpose Not Applicable													
Low	0	0.0	1.7	0	0.0	1.2	0	0.0	2.2	0	0.0	0.4	20.0	
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	2.2	0	0.0	0.9	16.6	
Middle	0	0.0	0.9	0	0.0	1.6	0	0.0	0.0	0	0.0	0.0	19.8	
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	43.6	
Unknown	0	0.0	97.4	0	0.0	97.2	0	0.0	95.7	0	0.0	98.7	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0	

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Table 107 – Qualified Investments Assessment Area: State of Washington													
Assessment Areas	Prior Period	Investments	Current Period	l Investments		Total Investment	s	Unfu Commi	nded tments					
Assessment Areas	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)					
Full Scope														
Washington	9	36,052	45	35,753	54	87.8	-	-						
Statewide/Regional	5	5,207	4	4,766	9	9,973	12.2	-	-					

Rated Area: State of Washington

Table 108 – Distribution of Branch Delivery System and Branch Openings/Closings **Assessment Area: State of Washington** Deposits **Branches Branch Openings / Closings Population** Location of Branches by % of % of Net Change in Location of % of Households within Rated Rated Income # of # of **Assessment Areas** Branches (+ or -) each Geography # of Bank Area Level of Geography (%) Area Branch Branch **Branches Deposits Branches** Openings Closings Mod Mid Mid Mod Mid Low Mod Upp Low Upp Low Upp in AA in AA Full Scope Washington 100 4 100 25.0 0.0 0.0 75.0 0 0 0 0 0 0 4.9 18.4 35.5 39.0

Rated Area: State of Georgia

Table 109 – Lending Volume of Reported Loans Retail Lending Evaluation Period: January 1, 2020 to December 31, 2023 Community Development Lending Evaluation Period: January 1, 2021 to August 12, 2024

Assessment Area: Georgia

	% of Rated		l Business Loans	Small I	arm Loans	All HM	IDA Loans		Community lopment Loans	Total Re	eported Loans	% of Rated
Assessment Areas	Area Loans	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	Area Deposits
Full Scope												
Georgia	100	310	31,528	0	0	1,653	409,123	48	327,183	2,011	767,834	100
Statewide/Regional								4	11,858			

Table 110 - Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Georgia **Bank And Aggregate Loans By Year** 2020 2021 Geographic Total Bank Agg Bank Agg Bank Agg Bank Agg **Businesses %** Income Level # #% #% \$(000) \$% \$% # #% #% \$(000) \$% \$% 20 10.2 1,262 19.0 6.0 Low 14.6 5.2 1,481 5.3 18 18.8 5.8 5.9 Moderate 39 28.5 19.3 19.9 27 28.1 21.3 872 21.2 21.8 5,161 35.6 13.1 Middle 32 23.4 29.0 3,973 27.4 27.7 19 19.8 30.6 1,870 28.2 28.3 30.5 46 33.6 45.9 3,886 26.8 46.1 32 33.3 41.7 2,633 39.7 43.8 41.2 Upper Unknown 0 0.0 0.3 0 0.0 0.6 0 0.0 0.3 0 0.0 0.6 0.5 Tract-Unk 0 0.0 0.4 0 0.0 0.3 0 0.0 0.3 0 0.0 0.1

96

100.0

100.0

6,637

100.0

100.0

100.0

100.0

137

Total

100.0

100.0

14,501

100.0

Rated Area: State of Georgia

Table 111 - Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography Assessment Area: Georgia

					Bank A	And Aggreg	ate Loans E	By Year					
Geographic			2	022					2	023			Total
Income Level	Ва	ınk	Agg	Ban	k	Agg	Ва	ınk	Agg	Ban	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	2	5.9	4.9	610	15.2	5.5	2	4.7	4.5	1,010	15.8	4.8	5.7
Moderate	8	23.5	20.4	1,220	30.4	19.8	10	23.3	19.6	2,098	32.9	20.2	21.9
Middle	12	35.3	29.6	947	23.6	27.3	14	32.6	29.5	1,864	29.2	27.3	28.7
Upper	11	32.4	42.1	1,220	30.4	44.4	16	37.2	43.6	1,401	21.9	44.7	40.8
Unknown	1	2.9	2.7	10	0.2	3.0	1	2.3	2.5	10	0.2	2.9	3.0
Tract-Unk	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	
Total	34	100.0	100.0	4,007	100.0	100.0	43	100.0	100.0	6,383	100.0	100.0	100.0

		Table 112	2 - Distribu	ution of 2020	0 and 202	1 Home N	lortgage L	ending By	Income L	evel of Geog	raphy		
					Asse	ssment Aı	ea: Georg	gia					
					Bank A	And Aggreg	ate Loans I	By Year					
Geographic			2	020					2	.021			Owner
Income Level	Ва	ınk	Agg	Ban	k	Agg	Ва	ank	Agg	Ban	k	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purch	ase Loans						
Low	8	4.5	4.0	1,378	4.1	3.1	44	13.1	4.2	13,136	15.6	3.2	3.5
Moderate	59	33.5	18.8	9,581	28.5	14.1	134	39.9	18.1	31,747	37.6	13.5	18.1
Middle	52	29.5	36.1	9,353	27.8	31.4	76	22.6	35.1	18,397	21.8	30.5	35.4
Upper	57	32.4	41.0	13,281	39.5	51.4	82	24.4	42.5	21,181	25.1	52.8	42.9
Unknown	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	176	100.0	100.0	33,593	100.0	100.0	336	100.0	100.0	84,461	100.0	100.0	100.0

Rated Area: State of Georgia

						Refinance	Loans						
Low	10	13.2	2.1	2,601	13.9	1.6	16	6.4	2.5	3,969	7.1	2.0	3.5
Moderate	23	30.3	11.4	6,155	32.9	8.3	114	45.4	13.9	28,100	50.5	9.9	18.1
Middle	22	28.9	31.5	4,702	25.2	26.1	61	24.3	34.4	10,846	19.5	28.5	35.4
Upper	21	27.6	54.9	5,222	28.0	64.0	60	23.9	49.2	12,761	22.9	59.5	42.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	76	100.0	100.0	18,680	100.0	100.0	251	100.0	100.0	55,676	100.0	100.0	100.0
					Hon	ne Improve	ment Loan	ıs					
Low	2	18.2	2.1	196	13.9	1.5	0	0.0	2.3	0	0.0	1.7	3.5
Moderate	5	45.5	10.9	399	28.3	8.0	1	33.3	10.6	80	16.8	8.4	18.1
Middle	0	0.0	28.4	0	0.0	22.3	0	0.0	28.2	0	0.0	23.0	35.4
Upper	4	36.4	58.6	814	57.8	68.2	2	66.7	58.9	395	83.2	66.9	42.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	1,409	100.0	100.0	3	100.0	100.0	475	100.0	100.0	100.0
						Multifam	nily Loans						Multi-family Units %
Low	0	0.0	22.4	0	0.0	9.4	0	0.0	22.4	0	0.0	12.7	19.6
Moderate	0	0.0	32.9	0	0.0	24.9	0	0.0	28.9	0	0.0	24.5	31.3
Middle	0	0.0	20.2	0	0.0	21.4	0	0.0	28.9	0	0.0	43.7	19.6
Upper	0	0.0	24.2	0	0.0	44.3	0	0.0	19.5	0	0.0	18.3	29.0
Unknown	0	0.0	0.3	0	0.0	0.0	0	0.0	0.3	0	0.0	0.8	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Tot	al Home M	lortgage Lo	oans					Owner Occupied Units %
Low	20	7.2	2.9	4,175	7.5	2.6	60	9.8	3.2	17,105	12.0	3.0	3.5
Moderate	95	34.1	14.7	16,271	29.3	11.7	257	41.9	15.5	60,158	42.2	12.2	18.1
Middle	78	28.0	33.6	14,680	26.4	28.1	147	24.0	34.5	30,329	21.3	30.0	35.4

Rated Area: State of Georgia

Upper	86	30.8	48.7	20,442	36.8	57.6	149	24.3	46.8	35,037	24.6	54.7	42.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	279	100.0	100.0	55,568	100.0	100.0	613	100.0	100.0	142,629	100.0	100.0	100.0

	Т	able 113	- Distribu	tion of 2020	0 and 202	1 Home	Mortgage I	Lending B	y Income	Level of G	eography		
					Asse	essment A	rea: Geor	gia					
					Bank Aı	nd Aggrega	ate Loans By	Year					
Geographic			20	20					20	21			Owner Occupied
Income Level	Baı	nk	Agg	Ban	ık	Agg	Bar	nk	Agg	Bar	ık	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pur	pose LOC						
Low	0	0.0	1.7	0	0.0	0.9	0	0.0	1.7	0	0.0	1.0	3.5
Moderate	8	66.7	8.0	136	13.8	5.0	7	36.8	9.2	163	11.4	5.3	18.1
Middle	2	16.7	24.2	138	14.0	17.4	8	42.1	25.0	754	52.6	18.4	35.4
Upper	2	16.7	66.1	710	72.2	76.6	4	21.1	64.2	517	36.1	75.3	42.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	984	100.0	100.0	19	100.0	100.0	1,434	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exer	npt					
Low	0	0.0	2.6	0	0.0	1.5	0	0.0	3.3	0	0.0	1.8	3.5
Moderate	0	0.0	15.2	0	0.0	8.4	1	25.0	13.5	68	11.7	7.4	18.1
Middle	2	50.0	33.3	487	54.0	21.5	2	50.0	29.8	332	56.9	20.1	35.4
Upper	2	50.0	48.9	415	46.0	68.6	1	25.0	53.4	183	31.4	70.6	42.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	902	100.0	100.0	4	100.0	100.0	583	100.0	100.0	100.0
					Pi	urpose No	t Applicable						
Low	0	0.0	4.0	0	0.0	2.6	0	0.0	3.9	0	0.0	2.6	3.5

Rated Area: State of Georgia

Moderate	0	0.0	25.9	0	0.0	19.4	0	0.0	28.2	0	0.0	21.8	18.1
Middle	0	0.0	46.7	0	0.0	44.1	0	0.0	47.6	0	0.0	47.2	35.4
Upper	0	0.0	23.4	0	0.0	33.9	0	0.0	20.3	0	0.0	28.4	42.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 114	4 - Distrib	ution of 202	2 and 202	3 Home N	lortgage L	ending By	Income L	evel of Geog	graphy		
					Asse	ssment A	rea: Georg	gia					
					Bank A	And Aggreg	ate Loans I	By Year					
Geographic			2	022					2	2023			Owner
Income Level	Ва	ank	Agg	Ban	ık	Agg	Ва	ınk	Agg	Ban	k	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purch	ase Loans						
Low	14	8.5	4.1	2,643	5.8	2.8	21	4.9	4.6	4,677	3.5	5.1	3.2
Moderate	42	25.6	19.1	9,815	21.5	14.5	114	26.6	21.5	34,054	25.6	17.5	18.5
Middle	59	36.0	34.7	16,170	35.4	30.8	172	40.1	34.9	51,402	38.7	29.9	33.3
Upper	49	29.9	40.0	17,045	37.3	50.1	120	28.0	37.0	42,153	31.7	46.2	43.5
Unknown	0	0.0	2.1	0	0.0	1.8	2	0.5	2.0	494	0.4	1.5	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	164	100.0	100.0	45,673	100.0	100.0	429	100.0	100.0	132,780	100.0	100.0	100.0
						Refinance	Loans						
Low	9	19.6	3.4	774	8.6	2.3	6	9.4	4.1	997	7.5	1.6	3.2
Moderate	15	32.6	19.6	3,117	34.8	14.5	24	37.5	22.2	4,337	32.4	16.7	18.5
Middle	13	28.3	37.3	2,762	30.8	33.1	21	32.8	37.5	4,474	33.4	28.1	33.3
Upper	7	15.2	38.2	1,821	20.3	48.7	12	18.8	34.7	3,379	25.3	52.9	43.5
Unknown	2	4.3	1.4	494	5.5	1.3	1	1.6	1.4	189	1.4	0.7	1.3

Rated Area: State of Georgia

Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	46	100.0	100.0	8,968	100.0	100.0	64	100.0	100.0	13,376	100.0	100.0	100.0
	1	•			Hon	ne Improve	ment Loar	ıs			•		
Low	0	0.0	1.7	0	0.0	1.3	0	0.0	2.3	0	0.0	1.9	3.2
Moderate	0	0.0	11.3	0	0.0	8.6	3	100.0	12.8	597	100.0	9.1	18.5
Middle	4	57.1	28.9	630	53.8	23.2	0	0.0	31.6	0	0.0	25.3	33.3
Upper	3	42.9	57.1	540	46.2	66.0	0	0.0	52.2	0	0.0	62.6	43.5
Unknown	0	0.0	1.0	0	0.0	0.9	0	0.0	1.1	0	0.0	1.1	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	1,170	100.0	100.0	3	100.0	100.0	597	100.0	100.0	100.0
						Multifam	nily Loans						Multi-family Units %
Low	0	0.0	18.3	0	0.0	9.0	0	0.0	22.6	0	0.0	16.1	14.4
Moderate	0	0.0	30.1	0	0.0	32.9	0	0.0	33.3	0	0.0	26.3	28.1
Middle	0	0.0	21.9	0	0.0	16.8	0	0.0	22.6	0	0.0	18.6	19.4
Upper	0	0.0	25.8	0	0.0	36.3	0	0.0	14.4	0	0.0	26.1	31.2
Unknown	0	0.0	3.9	0	0.0	4.9	0	0.0	7.2	0	0.0	13.0	6.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Tot	al Home M	lortgage Lo	oans					Owner Occupied Units %
Low	24	9.8	3.6	3,422	5.6	3.2	28	5.4	4.2	5,684	3.8	4.7	3.2
Moderate	63	25.7	18.5	13,526	22.2	15.9	144	27.9	20.5	39,471	26.3	17.5	18.5
Middle	87	35.5	34.9	21,120	34.7	29.7	200	38.8	35.2	56,786	37.9	28.7	33.3
Upper	69	28.2	41.2	22,366	36.7	49.3	140	27.1	38.4	47,364	31.6	47.2	43.5
Unknown	2	0.8	1.7	494	0.8	1.9	4	0.8	1.7	693	0.5	1.9	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	245	100.0	100.0	60,928	100.0	100.0	516	100.0	100.0	149,998	100.0	100.0	100.0

Rated Area: State of Georgia

Table 115 - Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography

Assessment Area: Georgia

					7.55.		wear dear						
					Bank Aı	nd Aggrega	ate Loans By	Year					
Geographic			20	22					20	23			Owner Occupied
Income Level	Bai	nk	Agg	Ban	ık	Agg	Bar	nk	Agg	Bar	ık	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	rpose LOC						
Low	1	8.3	1.7	5	0.3	1.0	1	9.1	2.0	10	0.6	1.2	3.2
Moderate	3	25.0	11.9	15	1.0	7.2	2	18.2	14.0	228	14.4	10.1	18.5
Middle	4	33.3	29.2	313	21.4	21.3	3	27.3	32.2	236	14.9	23.9	33.3
Upper	4	33.3	56.5	1,132	77.3	69.8	4	36.4	50.8	1,098	69.4	63.7	43.5
Unknown	0	0.0	0.8	0	0.0	0.7	1	9.1	1.1	10	0.6	1.0	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	12	100.0	100.0	1,465	100.0	100.0	11	100.0	100.0	1,582	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exer	npt					
Low	0	0.0	3.1	0	0.0	2.0	0	0.0	3.1	0	0.0	3.2	3.2
Moderate	3	18.8	15.2	579	15.9	8.7	1	11.1	17.8	255	15.3	14.3	18.5
Middle	7	43.8	32.9	1,245	34.1	19.6	4	44.4	37.5	674	40.5	28.8	33.3
Upper	6	37.5	47.7	1,828	50.1	68.7	4	44.4	40.2	734	44.1	51.7	43.5
Unknown	0	0.0	1.0	0	0.0	1.0	0	0.0	1.3	0	0.0	2.0	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	16	100.0	100.0	3,652	100.0	100.0	9	100.0	100.0	1,663	100.0	100.0	100.0
					P	urpose No	t Applicable						
Low	0	0.0	3.7	0	0.0	2.3	0	0.0	6.3	0	0.0	4.1	3.2
Moderate	0	0.0	26.6	0	0.0	19.3	0	0.0	26.4	0	0.0	18.8	18.5
Middle	0	0.0	43.4	0	0.0	39.9	0	0.0	49.9	0	0.0	51.7	33.3
Upper	0	0.0	24.5	0	0.0	37.1	0	0.0	15.9	0	0.0	23.8	43.5
Unknown	0	0.0	1.7	0	0.0	1.4	0	0.0	1.6	0	0.0	1.5	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

Rated Area: State of Georgia

Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 116	- Distribu	tion of 2020	and 2021	1 Small Bւ	ısiness Le	nding By F	Revenue S	ize of Busin	iesses		
					Assess	sment Are	ea: Georgi	ia					
					Bank A	nd Aggreg	ate Loans I	By Year					
			2	020					2	021			Total
	Ва	ank	Agg	Ban	nk	Agg	Ва	ınk	Agg	Bar	nk	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	33	24.1	42.2	1,338	9.2	26.7	28	29.2	42.1	1,471	22.2	27.9	93.4
Over \$1 Million	4	2.9		2,052	14.2		7	7.3		2,335	35.2		5.7
Revenue Unknown	100	73.0		11,111	76.6		61	63.5		2,831	42.7		0.9
Total	137	100.0		14,501	100.0		96	100.0		6,637	100.0		100.0
		1				By Loan	Size						
\$100,000 or Less	98	71.5	90.1	2,570	17.7	35.7	80	83.3	94.5	1,754	26.4	42.9	
\$100,001 - \$250,000	20	14.6	5.7	3,065	21.1	19.4	9	9.4	3.2	1,529	23.0	17.1	
\$250,001 - \$1 Million	19	13.9	4.2	8,866	61.1	44.8	7	7.3	2.3	3,354	50.5	40.0	
Total	137	100.0	100.0	14,501	100.0	100.0	96	100.0	100.0	6,637	100.0	100.0	
				Ву І	Loan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	30	90.9		299	22.3		25	89.3		251	17.1		
\$100,001 - \$250,000	1	3.0		150	11.2		1	3.6		166	11.3		
\$250,001 - \$1 Million	2	6.1		889	66.4		2	7.1		1,054	71.7		
Total	33	100.0		1,338	100.0		28	100.0		1,471	100.0		

Rated Area: State of Georgia

Table 117 - Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses Assessment Area: Georgia **Bank And Aggregate Loans By Year** 2022 2023 Total Bank Agg Bank Agg Bank Agg Bank Agg **Businesses %** # #% #% \$(000) \$% \$% #% #% \$(000) \$% \$% By Revenue \$1 Million or Less 27 79.4 48.6 1,657 34.3 26 60.5 50.7 22.1 33.4 93.7 41.4 1,410 Over \$1 Million 4 11.8 1,510 37.7 11 25.6 4,724 74.0 5.5 3 8.8 21.0 6 **Revenue Unknown** 840 14.0 249 3.9 0.8 Total 34 100.0 4,007 100.0 43 100.0 6,383 100.0 100.0 By Loan Size \$100,000 or Less 27 79.4 96.1 310 7.7 49.1 33 76.7 96.1 410 6.4 48.9 \$100,001 - \$250,000 2 5.9 2.1 350 8.7 13.5 3 7.0 2.1 590 9.2 13.3 \$250,001 - \$1 5 14.7 1.8 3,347 83.5 37.4 7 16.3 1.8 5,383 84.3 37.8 Million Total 34 100.0 100.0 4,007 100.0 100.0 100.0 100.0 100.0 100.0 6,383 By Loan Size and Revenues \$1 Million or Less 25 92.6 277 92.3 \$100,000 or Less 16.7 240 17.0 \$100,001 - \$250,000 0 0.0 0 0.0 3.8 240 17.0 1 \$250,001 - \$1 2 7.4 1,380 83.3 1 3.8 930 66.0 Million 27 100.0 1,657 100.0 26 100.0 100.0 Total 1,410

Rated Area: State of Georgia

Table 118 - Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level

Assessment Area: Georgia

					, 1000	.551116116741							
					Bank A	And Aggreg	ate Loans E	By Year					
Borrower			2020						2	021			Families by
Income Level	Ва	nk	Agg	Ban	ık	Agg	Ва	nk	Agg	Bar	nk	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					н	ome Purch	ase Loans						
Low	2	1.1	7.7	342	1.0	4.2	28	8.3	5.4	5,753	6.8	2.9	22.6
Moderate	33	18.8	21.9	7,221	21.5	15.9	106	31.5	18.3	25,255	29.9	13.0	16.5
Middle	9	5.1	21.8	2,116	6.3	20.0	49	14.6	20.0	14,192	16.8	17.9	17.9
Upper	7	4.0	35.5	2,271	6.8	47.1	44	13.1	37.5	17,004	20.1	48.4	43.0
Unknown	125	71.0	13.2	21,643	64.4	12.7	109	32.4	18.7	22,257	26.4	17.8	0.0
Total	176	100.0	100.0	33,593	100.0	100.0	336	100.0	100.0	84,461	100.0	100.0	100.0
						Refinance	Loans						
Low	8	10.5	4.3	1,131	6.1	2.2	41	16.3	6.5	6,439	11.6	3.4	22.6
Moderate	23	30.3	11.2	4,874	26.1	7.4	97	38.6	15.1	18,748	33.7	10.4	16.5
Middle	8	10.5	17.5	1,685	9.0	14.5	38	15.1	18.7	9,183	16.5	15.9	17.9
Upper	20	26.3	45.6	7,325	39.2	55.4	59	23.5	38.8	18,908	34.0	49.3	43.0
Unknown	17	22.4	21.3	3,665	19.6	20.5	16	6.4	20.9	2,398	4.3	21.0	0.0
Total	76	100.0	100.0	18,680	100.0	100.0	251	100.0	100.0	55,676	100.0	100.0	100.0
					Hor	ne Improve	ment Loan	s					
Low	0	0.0	5.1	0	0.0	2.8	1	33.3	5.4	195	41.1	3.2	22.6
Moderate	0	0.0	11.4	0	0.0	7.7	1	33.3	11.5	80	16.8	8.0	16.5
Middle	0	0.0	19.0	0	0.0	14.7	0	0.0	19.1	0	0.0	15.2	17.9
Upper	0	0.0	59.6	0	0.0	67.8	0	0.0	60.3	0	0.0	69.4	43.0
Unknown	11	100.0	4.9	1,409	100.0	7.0	1	33.3	3.8	200	42.1	4.3	0.0
Total	11	100.0	100.0	1,409	100.0	100.0	3	100.0	100.0	475	100.0	100.0	100.0
		•	•		Tota	l Home Mo	rtgage Loai	ns			•	•	
Low	12	4.3	5.6	1,481	2.7	3.0	72	11.7	6.0	12,397	8.7	3.2	22.6
Moderate	61	21.9	15.0	12,340	22.2	10.8	212	34.6	16.1	44,265	31.0	11.5	16.5

Rated Area: State of Georgia

Middle	17	6.1	18.6	3,801	6.8	16.5	90	14.7	19.0	23,538	16.5	16.7	17.9
Upper	30	10.8	40.7	9,611	17.3	51.3	105	17.1	39.0	35,922	25.2	49.2	43.0
Unknown	159	57.0	20.0	28,335	51.0	18.3	134	21.9	19.9	26,507	18.6	19.5	0.0
Total	279	100.0	100.0	55,568	100.0	100.0	613	100.0	100.0	142,629	100.0	100.0	100.0

		Table 11	9 - Distrik	oution of 20)20 and 2	021 Hom	e Mortgage	Lending	By Borro	wer Income	Level		
					Asse	essment A	Area: Georg	ia					
					Bank A	nd Aggreg	ate Loans By	Year					
Borrower Income			2020						20	21			Families by Family
Level	Ban	ık	Agg	Ban	ık	Agg	Bar	ık	Agg	Bar	ık	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pur	pose LOC						
Low	2	16.7	4.1	8	0.8	1.9	2	10.5	4.4	10	0.7	2.2	22.6
Moderate	4	33.3	8.5	118	12.0	4.6	7	36.8	10.3	35	2.4	5.9	16.5
Middle	0	0.0	16.4	0	0.0	10.6	2	10.5	16.1	95	6.6	10.7	17.9
Upper	3	25.0	68.5	15	1.5	80.4	2	10.5	64.6	10	0.7	77.3	43.0
Unknown	3	25.0	2.5	843	85.7	2.5	6	31.6	4.6	1,284	89.5	3.9	0.0
Total	12	100.0	100.0	984	100.0	100.0	19	100.0	100.0	1,434	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exen	npt					
Low	0	0.0	8.1	0	0.0	4.1	0	0.0	7.2	0	0.0	3.1	22.6
Moderate	1	25.0	13.6	127	14.1	8.2	1	25.0	14.3	147	25.2	7.1	16.5
Middle	0	0.0	19.5	0	0.0	12.5	1	25.0	17.7	68	11.7	10.8	17.9
Upper	0	0.0	43.2	0	0.0	63.6	0	0.0	50.7	0	0.0	68.9	43.0
Unknown	3	75.0	15.7	775	85.9	11.6	2	50.0	10.1	368	63.1	10.2	0.0
Total	4	100.0	100.0	902	100.0	100.0	4	100.0	100.0	583	100.0	100.0	100.0
					Pı	urpose No	t Applicable						
Low	0	0.0	3.0	0	0.0	2.2	0	0.0	2.8	0	0.0	2.0	22.6
Moderate	0	0.0	3.1	0	0.0	3.2	0	0.0	2.7	0	0.0	2.5	16.5
Middle	0	0.0	1.5	0	0.0	1.8	0	0.0	0.8	0	0.0	0.8	17.9

Rated Area: State of Georgia

Upper	0	0.0	0.7	0	0.0	1.1	0	0.0	0.4	0	0.0	0.6	43.0
Unknown	0	0.0	91.7	0	0.0	91.8	0	0.0	93.4	0	0.0	94.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table	120 - Disti	ribution of 2	022 and 20	023 Home	Mortgage	Lending E	By Borrow	er Income Le	vel		
					Asse	ssment Ar	ea: Georg	ia					
					Bank A	And Aggreg	ate Loans I	By Year					
Borrower			2022						2	2023			Families by
Income Level	Ва	ank	Agg	Bar	nk	Agg	Ва	ank	Agg	Bar	nk	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purch	ase Loans						
Low	9	5.5	3.9	2,180	4.8	1.9	41	9.6	3.4	9,242	7.0	1.4	21.5
Moderate	44	26.8	16.4	13,762	30.1	11.3	149	34.7	16.7	46,712	35.2	9.4	16.8
Middle	21	12.8	21.0	7,604	16.6	18.5	57	13.3	21.0	21,197	16.0	15.4	19.3
Upper	7	4.3	37.6	2,496	5.5	48.5	26	6.1	35.5	11,932	9.0	39.2	42.5
Unknown	83	50.6	21.1	19,631	43.0	19.7	156	36.4	23.4	43,697	32.9	34.7	0.0
Total	164	100.0	100.0	45,673	100.0	100.0	429	100.0	100.0	132,780	100.0	100.0	100.0
						Refinance	Loans						
Low	4	8.7	11.4	636	7.1	6.6	16	25.0	11.0	2,326	17.4	3.2	21.5
Moderate	5	10.9	22.7	991	11.1	17.5	26	40.6	22.5	4,795	35.8	9.0	16.8
Middle	3	6.5	22.0	713	8.0	20.5	6	9.4	21.4	973	7.3	10.0	19.3
Upper	0	0.0	29.8	0	0.0	40.7	5	7.8	28.1	2,450	18.3	18.1	42.5
Unknown	34	73.9	14.1	6,628	73.9	14.8	11	17.2	17.0	2,832	21.2	59.8	0.0
Total	46	100.0	100.0	8,968	100.0	100.0	64	100.0	100.0	13,376	100.0	100.0	100.0
					Hor	ne Improve	ment Loan	s					
Low	0	0.0	4.9	0	0.0	2.9	1	33.3	5.9	157	26.3	3.2	21.5
Moderate	0	0.0	13.3	0	0.0	9.1	0	0.0	15.9	0	0.0	10.0	16.8

Rated Area: State of Georgia

Middle	0	0.0	20.9	0	0.0	16.0	0	0.0	23.0	0	0.0	17.2	19.3
Upper	0	0.0	56.9	0	0.0	68.2	0	0.0	50.0	0	0.0	63.1	42.5
Unknown	7	100.0	4.0	1,170	100.0	3.9	2	66.7	5.2	440	73.7	6.4	0.0
Total	7	100.0	100.0	1,170	100.0	100.0	3	100.0	100.0	597	100.0	100.0	100.0
					Tota	l Home Mo	rtgage Loar	ıs					
Low	14	5.7	6.4	2,821	4.6	3.2	61	11.8	5.3	12,080	8.1	1.9	21.5
Moderate	54	22.0	17.9	14,833	24.3	12.8	179	34.7	17.6	51,852	34.6	9.3	16.8
Middle	25	10.2	21.1	8,322	13.7	18.8	63	12.2	21.2	22,170	14.8	14.1	19.3
Upper	7	2.9	36.9	2,496	4.1	47.3	32	6.2	35.7	14,392	9.6	35.2	42.5
Unknown	145	59.2	17.7	32,456	53.3	18.0	181	35.1	20.1	49,504	33.0	39.5	0.0
Total	245	100.0	100.0	60,928	100.0	100.0	516	100.0	100.0	149,998	100.0	100.0	100.0

		Table 12	1 - Distrib	oution of 20	22 and 2	023 Hom	e Mortgage	Lending	By Borro	wer Income	Level		
					Asse	ssment A	Area: Georg	ia					
					Bank A	nd Aggreg	ate Loans By	Year					
Borrower Income			2022						20	23			Families by Family
Level	Bar	nk	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pur	pose LOC						
Low	1	8.3	5.0	5	0.3	2.7	1	9.1	6.0	10	0.6	3.7	21.5
Moderate	4	33.3	12.0	20	1.4	6.5	3	27.3	15.4	15	0.9	8.9	16.8
Middle	1	8.3	20.3	5	0.3	13.4	0	0.0	22.2	0	0.0	15.8	19.3
Upper	0	0.0	56.5	0	0.0	72.1	1	9.1	47.6	10	0.6	64.5	42.5
Unknown	6	50.0	6.2	1,435	98.0	5.3	6	54.5	8.8	1,547	97.8	7.1	0.0
Total	12	100.0	100.0	1,465	100.0	100.0	11	100.0	100.0	1,582	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exem	pt					
Low	0	0.0	7.2	0	0.0	3.9	2	22.2	8.9	345	20.7	5.1	21.5
Moderate	1	6.3	16.2	60	1.6	8.4	1	11.1	17.3	330	19.8	11.0	16.8
Middle	0	0.0	21.0	0	0.0	12.0	0	0.0	22.3	0	0.0	14.5	19.3

Rated Area: State of Georgia

Upper	0	0.0	45.2	0	0.0	62.4	0	0.0	38.0	0	0.0	50.0	42.5
Unknown	15	93.8	10.3	3,592	98.4	13.2	6	66.7	13.5	988	59.4	19.5	0.0
Total	16	100.0	100.0	3,652	100.0	100.0	9	100.0	100.0	1,663	100.0	100.0	100.0
					Pı	urpose No	t Applicable						
Low	0	0.0	2.6	0	0.0	1.9	0	0.0	3.5	0	0.0	2.8	21.5
Moderate	0	0.0	1.6	0	0.0	1.8	0	0.0	2.3	0	0.0	2.2	16.8
Middle	0	0.0	0.7	0	0.0	0.9	0	0.0	0.4	0	0.0	0.5	19.3
Upper	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	42.5
Unknown	0	0.0	94.9	0	0.0	95.3	0	0.0	93.7	0	0.0	94.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

				ified Investments Area: Georgia						
Assessment Areas	Prior Period	Investments	Current Period	d Investments	То	tal Investmer	nts	Unfunded Commitments		
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)	
Full Scope										
Georgia	9	67,925	23 90,838		32	158,764	95.2	-	-	
Statewide/Regional	7	3,947	3	4,018	10	7,965	4.8	-	-	

Rated Area: State of Georgia

Table 123 – Distribution of Branch Delivery System and Branch Openings/Closings **Assessment Area: Georgia Branch Openings / Closings** Deposits **Branches** Population Location of Branches by % of % of Net Change in Location of % of Households within # of Rated Rated Income # of **Assessment Areas** # of Bank Branches (+ or -) each Geography Level of Geography (%) Area Area **Branch** Branch **Branches** Deposits **Branches Openings** Closings Upp Low Mod Mid Low Mod Mid Upp Low Mod Mid Upp in AA in AA

33.3

0

0

7.2

23.6

30.5

36.2

0

0

0

0

Full Scope

Georgia

100

3

100

33.3

0.0

33.3

Rated Area: State of Massachusetts

Table 124 – Lending Volume of Reported Loans Retail Lending Evaluation Period: January 1, 2020 to December 31, 2023

Community Development Lending Period: January 1, 2021 to August 12, 2024

				A	ssessment Ai	rea: ivias:	sachusetts					
	% of Rated	Small B	usiness Loans	Small	Farm Loans	All H	IMDA Loans		mmunity pment Loans	Total Re	eported Loans	% of Rated
Assessment Areas	Area Loans	#	\$ (000's)	# \$ (000's)		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	Area Deposits
Full Scope												
Massachusetts	100	2,020	20,732	0	0	914	491,680	4	25,053	2,938	537,465	100
Statewide/Regional								10	101,718			

		Table 12	25 - Distrik	oution of 20	20 and 20	21 Small E	Business L	ending By	Income L	evel of Geog	graphy		
					Assessn	nent Area	: Massach	usetts					
					Bank A	And Aggreg	ate Loans E	By Year					
Geographic			2	020					2	021			Total
Income Level	Ва	nk	Agg	Ban	ık	Agg	Ва	ınk	Agg	Bar	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	282	42.3	5.8	2,278	27.5	5.4	219	38.5	6.0	1,897	22.7	5.3	6.0
Moderate	288	43.2	14.8	1,707	20.6	12.2	242	42.5	16.5	1,802	21.6	13.4	13.9
Middle	69	10.4	34.8	1,660	20.0	35.8	71	12.5	34.9	1,600	19.2	35.3	34.0
Upper	24	3.6	44.0	2,628	31.7	45.8	31	5.4	41.9	3,042	36.4	45.1	45.6
Unknown	3	0.5	0.4	9	0.1	0.8	6	1.1	0.5	13	0.2	0.8	0.5
Tract-Unk	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	
Total	666	100.0	100.0	8,282	100.0	100.0	569	100.0	100.0	8,354	100.0	100.0	100.0

Rated Area: State of Massachusetts

Table 126 - Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography

Assessment Area: Massachusetts

					Bank A	and Aggreg	ate Loans I	By Year							
Geographic		2022							2023						
Income Level	Ва	Bank		Bank		Agg	Bank		Agg	Agg Bank		Agg	Total Businesses %		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%			
Low	205	40.9	5.0	851	36.5	4.0	102	35.9	4.9	338	19.1	4.2	4.9		
Moderate	189	37.7	14.9	882	37.9	13.6	99	34.9	14.8	306	17.3	13.6	13.0		
Middle	76	15.2	34.1	343	14.7	34.7	59	20.8	34.2	599	33.9	35.3	33.4		
Upper	18	3.6	43.9	208	8.9	45.5	20	7.0	44.2	504	28.5	44.7	47.0		
Unknown	13	2.6	1.8	46	2.0	2.0	4	1.4	1.7	19	1.1	2.2	1.7		
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1			
Total	501	100.0	100.0	2,330	100.0	100.0	284	100.0	100.0	1,766	100.0	100.0	100.0		

	Table 127 - Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography												
					Assessm	ent Area:	Massachu	usetts					
	Bank And Aggregate Loans By Year												
Geographic			2	020					2	021			Owner
Income Level	Ва	ank	Agg	Ban	k	Agg	Ва	nk	Agg	Ban	k	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	Home Purchase Loans												
Low	6	4.8	3.7	2,316	3.4	3.0	16	8.7	4.6	7,237	8.2	3.9	3.0
Moderate	26	21.0	15.9	11,946	17.7	12.7	36	19.7	17.5	14,525	16.4	14.6	14.1
Middle	36	29.0	38.2	12,366	18.3	31.3	68	37.2	37.3	25,876	29.2	31.4	39.4
Upper	56	45.2	41.9	41,039	60.6	52.6	62	33.9	40.3	40,783	46.0	49.7	43.3
Unknown	0	0.0	0.3	0	0.0	0.4	1	0.5	0.3	191	0.2	0.4	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	124	100.0	100.0	67,667	100.0	100.0	183	100.0	100.0	88,612	100.0	100.0	100.0

Rated Area: State of Massachusetts

Refinance Loans													
Low	4	5.3	2.7	1,257	4.2	2.4	6	13.0	3.1	1,757	7.0	2.8	3.0
Moderate	22	29.3	12.6	8,163	27.6	10.9	13	28.3	13.8	4,777	19.1	11.7	14.1
Middle	27	36.0	38.5	7,375	24.9	34.4	12	26.1	37.8	4,418	17.7	31.8	39.4
Upper	22	29.3	46.0	12,827	43.3	52.0	15	32.6	45.0	14,052	56.2	53.4	43.3
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	75	100.0	100.0	29,622	100.0	100.0	46	100.0	100.0	25,004	100.0	100.0	100.0
					Hom	ne Improve	ment Loan	s					
Low	0	0.0	2.5	0	0.0	2.8	0	0.0	2.3	0	0.0	2.2	3.0
Moderate	0	0.0	11.2	0	0.0	10.4	2	33.3	10.6	193	6.5	8.2	14.1
Middle	0	0.0	38.5	0	0.0	31.9	1	16.7	36.9	110	3.7	31.1	39.4
Upper	0	0.0	47.7	0	0.0	54.7	3	50.0	50.1	2,659	89.8	58.4	43.3
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	6	100.0	100.0	2,962	100.0	100.0	100.0
						Multifam	ily Loans						Multi-family Units %
Low	0	0.0	18.9	0	0.0	12.7	0	0.0	17.0	0	0.0	10.7	12.3
Moderate	0	0.0	31.8	0	0.0	29.0	0	0.0	30.5	0	0.0	25.2	24.3
Middle	0	0.0	29.0	0	0.0	36.9	0	0.0	33.0	0	0.0	40.7	34.5
Upper	0	0.0	19.9	0	0.0	21.3	0	0.0	19.0	0	0.0	23.2	28.0
Unknown	0	0.0	0.4	0	0.0	0.2	0	0.0	0.4	0	0.0	0.3	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	10	4.8	3.0	3,573	3.5	3.1	22	8.9	3.5	8,994	7.3	3.6	3.0
Moderate	48	23.1	13.5	20,109	19.6	12.3	52	21.1	14.8	19,815	16.1	13.3	14.1
Middle	67	32.2	38.3	21,096	20.6	33.4	85	34.4	37.5	32,047	26.0	31.9	39.4

Rated Area: State of Massachusetts

Upper	83	39.9	45.1	57,661	56.3	50.9	87	35.2	43.9	62,252	50.5	50.9	43.3
Unknown	0	0.0	0.2	0	0.0	0.3	1	0.4	0.2	191	0.2	0.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	208	100.0	100.0	102,439	100.0	100.0	247	100.0	100.0	123,299	100.0	100.0	100.0

	Т	able 128	- Distribu	ition of 202	0 and 20	21 Home	Mortgage	Lending E	By Incom	e Level of G	eography	/	
					Assessi	ment Are	a: Massach	usetts					
					Bank Aı	nd Aggreg	ate Loans By	Year					
Geographic Income			20	20					Owner Occupied Unit				
Level	Bank		Agg	Bank		Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	rpose LOC						
Low	0	0.0	1.9	0	0.0	1.6	0	0.0	1.6	0	0.0	1.0	3.0
Moderate	0	0.0	10.2	0	0.0	6.9	1	10.0	9.5	320	5.1	7.1	14.1
Middle	2	28.6	33.1	813	17.6	24.2	3	30.0	33.7	1,443	23.1	24.0	39.4
Upper	5	71.4	54.8	3,795	82.4	67.2	6	60.0	55.1	4,475	71.7	67.8	43.3
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	4,608	100.0	100.0	10	100.0	100.0	6,238	100.0	100.0	100.0
					Othe	er Purpose	Closed/Exe	mpt					
Low	0	0.0	2.4	0	0.0	1.7	0	0.0	2.2	0	0.0	1.5	3.0
Moderate	0	0.0	13.9	0	0.0	10.4	0	0.0	12.0	0	0.0	6.2	14.1
Middle	2	100.0	35.9	542	100.0	15.7	1	50.0	35.6	200	41.4	17.3	39.4
Upper	0	0.0	47.5	0	0.0	71.9	1	50.0	49.8	283	58.6	74.2	43.3
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.8	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	542	100.0	100.0	2	100.0	100.0	483	100.0	100.0	100.0
					P	urpose N	ot Applicable)					
Low	0	0.0	7.5	0	0.0	5.8	0	0.0	6.6	0	0.0	6.6	3.0

Rated Area: State of Massachusetts

Moderate	0	0.0	22.3	0	0.0	17.9	0	0.0	25.9	0	0.0	23.6	14.1
Middle	0	0.0	39.3	0	0.0	34.6	0	0.0	34.2	0	0.0	28.6	39.4
Upper	0	0.0	30.8	0	0.0	41.6	0	0.0	33.0	0	0.0	41.0	43.3
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.3	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Table 129 - Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography												
					Assessm	ent Area:	Massachi	usetts					
					Bank A	And Aggreg	ate Loans I	By Year					
Geographic			2	022					2	.023			Owner
Income Level	Ва	ınk	Agg Bank		Agg	Ва	nk	Agg	Ban	k	Agg	Occupied Units %	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	5
Home Purchase Loans													
Low	6	3.5	4.7	2,569	2.6	4.2	9	4.1	5.1	3,864	3.1	4.2	3.2
Moderate	32	18.5	13.8	12,098	12.2	10.7	37	16.9	13.8	14,513	11.6	10.4	12.7
Middle	61	35.3	35.4	23,627	23.7	28.6	73	33.3	32.8	29,900	24.0	25.3	36.7
Upper	66	38.2	45.0	57,593	57.9	55.4	88	40.2	46.8	70,708	56.7	58.7	46.7
Unknown	8	4.6	1.1	3,660	3.7	1.1	12	5.5	1.5	5,714	4.6	1.4	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	173	100.0	100.0	99,547	100.0	100.0	219	100.0	100.0	124,699	100.0	100.0	100.0
						Refinance	Loans						
Low	2	6.9	4.1	1,281	6.1	4.0	1	3.6	5.5	510	3.4	5.4	3.2
Moderate	3	10.3	13.6	1,206	5.8	11.0	5	17.9	12.5	1,857	12.4	9.2	12.7
Middle	12	41.4	35.8	6,945	33.2	28.3	12	42.9	30.5	4,718	31.4	20.7	36.7
Upper	10	34.5	45.8	10,520	50.2	55.9	10	35.7	50.5	7,918	52.8	63.7	46.7
Unknown	2	6.9	0.7	998	4.8	0.8	0	0.0	1.0	0	0.0	1.0	0.8

Rated Area: State of Massachusetts

Total 29	•							•						
Low	Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate 0 0.0 0.0 2.1 0 0.0 2.0 0 0.0 3.0 0 0.0 2.9 3.2	Total	29	100.0	100.0	20,950	100.0	100.0	28	100.0	100.0	15,003	100.0	100.0	100.0
Moderate 0 0.0 9.0 0 0.0 6.9 0 0.0 9.5 0 0.0 6.6 12.7 Middle 1 50.0 36.0 250 11.1 27.8 0 0.0 36.4 0 0.0 25.4 36.7 Upper 1 50.0 52.3 2,000 88.9 62.7 1 100.0 50.7 740 100.0 64.4 46.7 Unknown 0 0.0 0.5 0 0.0 0.6 0 0.						Hon	ne Improve	ment Loan	ıs					
Middle	Low	0	0.0	2.1	0	0.0	2.0	0	0.0	3.0	0	0.0	2.9	3.2
	Moderate	0	0.0	9.0	0	0.0	6.9	0	0.0	9.5	0	0.0	6.6	12.7
Unknown 0 0.0 0.5 0 0.0 0.6 0 0.0 0.5 0 0.0 0.6 0.8 Tract-Unk 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 Total 2 100.0 100.0 2,250 100.0 100.0 1 100.0 100.0 740 100.0 100.0 Total 2 100.0 130.9 0 0.0 100.6 0 0.0 19.2 0 0.0 100.0 Units Wildle 0 0.0 29.8 0 0.0 27.8 0 0.0 26.9 0 0.0 14.1 21.1 Middle 0 0.0 30.0 0 0.0 31.5 0 0.0 31.9 0 0.0 40.8 32.2 Upper 0 0.0 22.1 0 0.0 23.5 0 0.0 19.2 0 0.0 26.5 32.1 Unknown 0 0.0 4.2 0 0.0 6.6 0 0.0 19.2 0 0.0 26.5 32.1 Unknown 0 0.0 4.2 0 0.0 6.6 0 0.0 28.8 0 0.0 6.5 2.7 Tract-Unk 0 0.0 100.0 0 0.0 100.0 0 0.0 0.0 0.0 Total 0 0.0 100.0 0 0.0 100.0 0 0.0 100.0 Total 0 3.9 4.1 3,850 3.1 4.8 10 4.0 4.8 4,374 3.1 4.7 3.2 Unward 37 17.9 13.0 13,650 11.1 12.7 43 17.1 12.5 16,695 11.7 9.9 12.7 Middle 74 35.7 35.5 30,822 25.0 28.6 86 34.1 32.4 34,868 24.4 24.7 36.7 Unknown 10 4.8 0.9 4,658 3.8 1.7 12 4.8 1.3 5,714 4.0 1.6 0.8 Tract-Unk 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 Unknown 10 4.8 0.9 4,658 3.8 1.7 12 4.8 1.3 5,714 4.0 1.6 0.8 Tract-Unk 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 Unknown 10 4.8 0.9 4,658 3.8 1.7 12 4.8 1.3 5,714 4.0 1.6 0.8 Tract-Unk 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 Unknown 10 4.8 0.9 4,658 3.8 1.7 12 4.8 1.3 5,714 4.0 1.6 0.8 Tract-Unk 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 Unknown 10 4.8 0.9 4,658 3.8 1.7 12 4.8 1.3 5,714 4.0 1.6 0.8 Tract-Unk 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	Middle	1	50.0	36.0	250	11.1	27.8	0	0.0	36.4	0	0.0	25.4	36.7
Tract-Unk 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 100	Upper	1	50.0	52.3	2,000	88.9	62.7	1	100.0	50.7	740	100.0	64.4	46.7
Total 2 100.0 100.0 2,250 100.0 100.0 1 100.0 100.0 740 100.0 100.0 100.0 100.0	Unknown	0	0.0	0.5	0	0.0	0.6	0	0.0	0.5	0	0.0	0.6	0.8
Multi-family Low Decision County Low Decision County Decision County Decision Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
Low	Total	2	100.0	100.0	2,250	100.0	100.0	1	100.0	100.0	740	100.0	100.0	100.0
Moderate 0 0.0 29.8 0 0.0 27.8 0 0.0 26.9 0 0.0 14.1 21.1 Middle 0 0.0 30.0 0 0.0 31.5 0 0.0 31.9 0 0.0 40.8 32.2 Upper 0 0.0 22.1 0 0.0 23.5 0 0.0 19.2 0 0.0 26.5 32.1 Unknown 0 0.0 4.2 0 0.0 6.6 0 0.0 2.8 0 0.0 6.5 2.7 Tract-Unk 0 0.0							Multifam	nily Loans						•
Middle 0 0.0 30.0 0 0.0 31.5 0 0.0 31.9 0 0.0 40.8 32.2 Upper 0 0.0 22.1 0 0.0 23.5 0 0.0 19.2 0 0.0 26.5 32.1 Unknown 0 0.0 4.2 0 0.0 6.6 0 0.0 2.8 0 0.0 6.5 2.7 Tract-Unk 0 0.0	Low	0	0.0	13.9	0	0.0	10.6	0	0.0	19.2	0	0.0	12.1	12.0
Upper	Moderate	0	0.0	29.8	0	0.0	27.8	0	0.0	26.9	0	0.0	14.1	21.1
Unknown 0 0.0 4.2 0 0.0 6.6 0 0.0 2.8 0 0.0 6.5 2.7 Tract-Unk 0 0.0	Middle	0	0.0	30.0	0	0.0	31.5	0	0.0	31.9	0	0.0	40.8	32.2
Tract-Unk 0 0.0 100.0 <	Upper	0	0.0	22.1	0	0.0	23.5	0	0.0	19.2	0	0.0	26.5	32.1
Total 0 0.0 100.0 0 100.0 0 0.0 100.0 0 0.0 100.0 <t< th=""><td>Unknown</td><td>0</td><td>0.0</td><td>4.2</td><td>0</td><td>0.0</td><td>6.6</td><td>0</td><td>0.0</td><td>2.8</td><td>0</td><td>0.0</td><td>6.5</td><td>2.7</td></t<>	Unknown	0	0.0	4.2	0	0.0	6.6	0	0.0	2.8	0	0.0	6.5	2.7
Total Home Mortgage Loans Commer Occupied Units % Low 8 3.9 4.1 3,850 3.1 4.8 10 4.0 4.8 4,374 3.1 4.7 3.2 Moderate 37 17.9 13.0 13,650 11.1 12.7 43 17.1 12.5 16,695 11.7 9.9 12.7 Middle 74 35.7 35.5 30,822 25.0 28.6 86 34.1 32.4 34,868 24.4 24.7 36.7 Upper 78 37.7 46.5 70,334 57.0 52.1 101 40.1 49.0 80,977 56.8 59.2 46.7 Unknown 10 4.8 0.9 4,658 3.8 1.7 12 4.8 1.3 5,714 4.0 1.6 0.8 Tract-Unk 0 0.0 0 0.0 0 0 0 0 0 0 0 0 0 <	Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total Home Mortgage Loans Occupied Units % Low 8 3.9 4.1 3,850 3.1 4.8 10 4.0 4.8 4,374 3.1 4.7 3.2 Moderate 37 17.9 13.0 13,650 11.1 12.7 43 17.1 12.5 16,695 11.7 9.9 12.7 Middle 74 35.7 35.5 30,822 25.0 28.6 86 34.1 32.4 34,868 24.4 24.7 36.7 Upper 78 37.7 46.5 70,334 57.0 52.1 101 40.1 49.0 80,977 56.8 59.2 46.7 Unknown 10 4.8 0.9 4,658 3.8 1.7 12 4.8 1.3 5,714 4.0 1.6 0.8 Tract-Unk 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Moderate 37 17.9 13.0 13,650 11.1 12.7 43 17.1 12.5 16,695 11.7 9.9 12.7 Middle 74 35.7 35.5 30,822 25.0 28.6 86 34.1 32.4 34,868 24.4 24.7 36.7 Upper 78 37.7 46.5 70,334 57.0 52.1 101 40.1 49.0 80,977 56.8 59.2 46.7 Unknown 10 4.8 0.9 4,658 3.8 1.7 12 4.8 1.3 5,714 4.0 1.6 0.8 Tract-Unk 0 0.0 0 0.0 0						Tot	al Home M	ortgage Lo	ans					Occupied
Middle 74 35.7 35.5 30,822 25.0 28.6 86 34.1 32.4 34,868 24.4 24.7 36.7 Upper 78 37.7 46.5 70,334 57.0 52.1 101 40.1 49.0 80,977 56.8 59.2 46.7 Unknown 10 4.8 0.9 4,658 3.8 1.7 12 4.8 1.3 5,714 4.0 1.6 0.8 Tract-Unk 0 0.0	Low	8	3.9	4.1	3,850	3.1	4.8	10	4.0	4.8	4,374	3.1	4.7	3.2
Upper 78 37.7 46.5 70,334 57.0 52.1 101 40.1 49.0 80,977 56.8 59.2 46.7 Unknown 10 4.8 0.9 4,658 3.8 1.7 12 4.8 1.3 5,714 4.0 1.6 0.8 Tract-Unk 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 <td>Moderate</td> <td>37</td> <td>17.9</td> <td>13.0</td> <td>13,650</td> <td>11.1</td> <td>12.7</td> <td>43</td> <td>17.1</td> <td>12.5</td> <td>16,695</td> <td>11.7</td> <td>9.9</td> <td>12.7</td>	Moderate	37	17.9	13.0	13,650	11.1	12.7	43	17.1	12.5	16,695	11.7	9.9	12.7
Unknown 10 4.8 0.9 4,658 3.8 1.7 12 4.8 1.3 5,714 4.0 1.6 0.8 Tract-Unk 0 0.0 <td< th=""><td>Middle</td><td>74</td><td>35.7</td><td>35.5</td><td>30,822</td><td>25.0</td><td>28.6</td><td>86</td><td>34.1</td><td>32.4</td><td>34,868</td><td>24.4</td><td>24.7</td><td>36.7</td></td<>	Middle	74	35.7	35.5	30,822	25.0	28.6	86	34.1	32.4	34,868	24.4	24.7	36.7
Tract-Unk 0 0.0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0	Upper	78	37.7	46.5	70,334	57.0	52.1	101	40.1	49.0	80,977	56.8	59.2	46.7
	Unknown	10	4.8	0.9	4,658	3.8	1.7	12	4.8	1.3	5,714	4.0	1.6	0.8
Total 207 100.0 100.0 123,314 100.0 100.0 252 100.0 100.0 142,628 100.0 100.0 100.0	Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
	Total	207	100.0	100.0	123,314	100.0	100.0	252	100.0	100.0	142,628	100.0	100.0	100.0

Rated Area: State of Massachusetts

Table 130 - Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography **Assessment Area: Massachusetts** Bank And Aggregate Loans By Year 2022 2023 **Geographic Income Owner Occupied Units** % Level Bank Agg Bank Agg Bank Agg Bank Agg # \$% \$% #% \$% #% #% \$(000) #% \$(000) \$% Other Purpose LOC 0 0.0 0 0.0 0.0 2.2 0 0.0 1.6 3.2 Low 1.6 1.4 4.5 Moderate 2 66.7 8.3 346 61.0 5.3 0 0.0 7.9 0 0.0 12.7 0 0 0 0 0.0 21.5 36.7 Middle 0.0 34.1 0.0 25.0 0.0 33.1 1 33.3 55.3 221 39.0 67.6 2 100.0 55.8 1,611 100.0 70.9 46.7 Upper Unknown 0 0.0 0.7 0 0.0 0.7 0 0.0 1.1 0 0.0 1.5 0.8 Tract-Unk 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0.0 3 100.0 100.0 567 100.0 100.0 100.0 100.0 1,611 100.0 100.0 100.0 Total Other Purpose Closed/Exempt 2.0 3.2 0 0.0 3.0 0 0.0 1.9 0 0.0 2.4 0 0.0 Low Moderate 0 0 0.0 1 50.0 10.5 325 56.5 5.7 12.7 0.0 10.6 5.5 Middle 50.0 43.5 36.7 0 0.0 34.5 0 0.0 14.4 1 41.3 250 14.7 0 0.0 50.9 0 0.0 77.0 0 0.0 44.8 0 0.0 76.5 46.7 Upper 0 0.0 0.9 0 0.0 0 0.0 1.0 0 0.0 1.1 0.8 Unknown 1.2 0 0.0 0.0 Tract-Unk 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0.0 Total 0 0.0 100.0 0 0.0 100.0 100.0 100.0 575 100.0 100.0 100.0 **Purpose Not Applicable** Low 0 0.0 4.5 0 0.0 7.8 0.0 6.7 0 0.0 4.2 3.2 0 0.0 16.5 0 0.0 12.3 0 7.1 0 0.0 3.4 12.7 Moderate 0.0 Middle 0 0.0 50.0 0 0.0 48.3 0 0.0 14.3 0 0.0 8.1 36.7 0.0 Upper 0 0.0 29.0 0 0.0 31.6 0 0.0 69.3 0 82.0 46.7 Unknown 0 0.0 0.0 0 0.0 0.0 0 0.0 2.6 0 0.0 2.2 0.8 0 0.0 0.0 0 0.0 0 0.0 0.0 0 0.0 0.0 Tract-Unk 0.0

Rated Area: State of Massachusetts

Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 131	- Distribu	tion of 2020	and 2021	1 Small Bւ	ısiness Le	nding By F	Revenue S	ize of Busin	esses		
					Assessme	ent Area: I	Massachu	setts					
					Bank A	nd Aggreg	ate Loans I	By Year					
			2	020					2	021			Total
	Ва	ınk	Agg	Bar	nk	Agg	Ва	ınk	Agg	Bar	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	615	92.3	36.5	2,375	28.7	21.4	523	91.9	43.4	2,160	25.9	24.4	89.8
Over \$1 Million	0	0.0		0	0.0		7	1.2		619	7.4		9.6
Revenue Unknown	51	7.7		5,907	71.3		39	6.9		5,575	66.7		0.7
Total	666	100.0		8,282	100.0		569	100.0		8,354	100.0		100.0
						By Loan	Size						
\$100,000 or Less	649	97.4	86.7	3,663	44.2	31.3	552	97.0	91.0	2,610	31.2	36.2	
\$100,001 - \$250,000	12	1.8	7.8	1,960	23.7	21.6	7	1.2	5.3	1,162	13.9	19.9	
\$250,001 - \$1 Million	5	0.8	5.5	2,659	32.1	47.1	10	1.8	3.7	4,582	54.8	43.9	
Total	666	100.0	100.0	8,282	100.0	100.0	569	100.0	100.0	8,354	100.0	100.0	
				Ву І	Loan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	615	100.0		2,375	100.0		521	99.6		1,509	69.9		
\$100,001 - \$250,000	0	0.0		0	0.0		1	0.2		150	6.9		
\$250,001 - \$1 Million	0	0.0		0	0.0		1	0.2		501	23.2		
Total	615	100.0		2,375	100.0		523	100.0		2,160	100.0		

Rated Area: State of Massachusetts

Table 132 - Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses **Assessment Area: Massachusetts Bank And Aggregate Loans By Year** 2022 2023 Total Bank Bank Agg Bank Agg Bank Agg Agg **Businesses %** # #% #% \$(000) \$% \$% # #% #% \$(000) \$% \$% By Revenue \$1 Million or Less 498 99.4 47.6 2,150 92.3 31.6 279 98.2 51.7 1,361 77.1 31.1 89.7 Over \$1 Million 2 0.4 160 6.9 1 0.4 338 19.1 9.6 **Revenue Unknown** 1 0.2 20 0.9 4 1.4 67 3.8 0.7 Total 501 100.0 2,330 100.0 284 100.0 1,766 100.0 100.0 By Loan Size \$100,000 or Less 500 99.8 94.9 2,180 93.6 45.7 282 99.3 95.6 1,048 59.3 49.4 \$100,001 - \$250,000 1 0.2 2.9 150 6.4 15.6 0 0.0 2.5 0 0.0 15.2 \$250,001 - \$1 0 0.0 2.2 0 0.0 38.7 2 0.7 1.8 718 40.7 35.4 Million Takal 4000

Total	501	100.0	100.0	2,330	100.0	100.0	284	100.0	100.0	1,766	100.0	100.0	
				By L	oan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	498	100.0		2,150	100.0		278	99.6		981	72.1		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		1	0.4		380	27.9		
Total	498	100.0		2,150	100.0		279	100.0		1,361	100.0		

Rated Area: State of Massachusetts

		Table	133 - Disti	ribution of 20	020 and 20	21 Home	Mortgage	Lending B	y Borrowe	er Income Le	vel		
					Assessm	ent Area:	Massachu	setts					
					Bank A	And Aggreg	ate Loans B	y Year					
Borrower			2020						2	021			Families by Family
Income Level	Ва	ank	Agg	Ban	k	Agg	Ва	ınk	Agg	Bar	nk	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purcha	se Loans						
Low	2	1.6	3.9	426	0.6	1.6	6	3.3	4.0	1,697	1.9	1.7	22.9
Moderate	8	6.5	17.2	2,574	3.8	10.2	4	2.2	15.8	1,563	1.8	9.8	15.6
Middle	0	0.0	21.4	0	0.0	16.4	0	0.0	20.9	0	0.0	16.7	18.8
Upper	1	0.8	46.6	499	0.7	54.6	1	0.5	45.5	330	0.4	56.0	42.7
Unknown	113	91.1	10.9	64,168	94.8	17.1	172	94.0	13.8	85,022	95.9	15.7	0.0
Total	124	100.0	100.0	67,667	100.0	100.0	183	100.0	100.0	88,612	100.0	100.0	100.0
						Refinance	Loans						
Low	12	16.0	3.2	2,618	8.8	1.6	2	4.3	4.7	489	2.0	2.4	22.9
Moderate	27	36.0	14.3	7,892	26.6	9.8	13	28.3	15.7	3,879	15.5	10.5	15.6
Middle	9	12.0	23.9	3,395	11.5	19.9	4	8.7	22.2	1,273	5.1	18.4	18.8
Upper	7	9.3	48.9	3,251	11.0	56.5	0	0.0	44.7	0	0.0	54.8	42.7
Unknown	20	26.7	9.7	12,466	42.1	12.2	27	58.7	12.8	19,363	77.4	13.9	0.0
Total	75	100.0	100.0	29,622	100.0	100.0	46	100.0	100.0	25,004	100.0	100.0	100.0
					Hon	ne Improve	ment Loans	;					
Low	0	0.0	5.4	0	0.0	3.3	0	0.0	5.2	0	0.0	3.7	22.9
Moderate	0	0.0	13.3	0	0.0	9.8	0	0.0	13.0	0	0.0	8.8	15.6
Middle	0	0.0	22.9	0	0.0	18.3	1	16.7	22.2	110	3.7	17.1	18.8
Upper	0	0.0	54.9	0	0.0	59.8	0	0.0	57.0	0	0.0	62.7	42.7
Unknown	0	0.0	3.4	0	0.0	8.8	5	83.3	2.6	2,852	96.3	7.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	6	100.0	100.0	2,962	100.0	100.0	100.0
	•	•	•		Total	Home Mo	rtgage Loan	ıs	•		•		
Low	14	6.7	3.5	3,044	3.0	1.6	8	3.2	4.6	2,186	1.8	2.2	22.9
Moderate	35	16.8	14.8	10,466	10.2	9.8	17	6.9	15.5	5,442	4.4	10.2	15.6

Rated Area: State of Massachusetts

Middle	9	4.3	23.0	3,395	3.3	18.6	5	2.0	21.7	1,383	1.1	17.6	18.8
Upper	8	3.8	48.4	3,750	3.7	55.8	1	0.4	45.7	330	0.3	55.5	42.7
Unknown	142	68.3	10.3	81,784	79.8	14.1	216	87.4	12.6	113,958	92.4	14.5	0.0
Total	208	100.0	100.0	102,439	100.0	100.0	247	100.0	100.0	123,299	100.0	100.0	100.0

		Table 13	4 - Distrik	oution of 20)20 and 2	021 Hom	e Mortgage	Lending	By Borro	wer Income	Level		
					Assessn	nent Area	։ Massachu	setts					
					Bank A	nd Aggreg	ate Loans By	Year					
Borrower Income			2020						20	21			Families by Family
Level	Bar	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	pose LOC						
Low	0	0.0	5.7	0	0.0	3.0	0	0.0	5.4	0	0.0	3.2	22.9
Moderate	0	0.0	12.2	0	0.0	7.0	0	0.0	12.5	0	0.0	7.5	15.6
Middle	0	0.0	20.9	0	0.0	15.3	0	0.0	20.3	0	0.0	14.6	18.8
Upper	0	0.0	60.3	0	0.0	73.0	0	0.0	60.4	0	0.0	70.7	42.7
Unknown	7	100.0	0.9	4,608	100.0	1.6	10	100.0	1.5	6,238	100.0	3.9	0.0
Total	7	100.0	100.0	4,608	100.0	100.0	10	100.0	100.0	6,238	100.0	100.0	100.0
					Othe	r Purpose	Closed/Exem	pt					
Low	0	0.0	5.9	0	0.0	2.0	0	0.0	8.2	0	0.0	3.2	22.9
Moderate	0	0.0	15.5	0	0.0	5.7	0	0.0	14.9	0	0.0	5.5	15.6
Middle	0	0.0	17.8	0	0.0	7.7	0	0.0	18.3	0	0.0	7.9	18.8
Upper	0	0.0	51.3	0	0.0	63.3	0	0.0	49.3	0	0.0	66.5	42.7
Unknown	2	100.0	9.5	542	100.0	21.4	2	100.0	9.3	483	100.0	17.0	0.0
Total	2	100.0	100.0	542	100.0	100.0	2	100.0	100.0	483	100.0	100.0	100.0
		•			Pı	urpose No	t Applicable						
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	22.9
Moderate	0	0.0	0.8	0	0.0	0.6	0	0.0	0.9	0	0.0	0.7	15.6
Middle	0	0.0	0.4	0	0.0	0.3	0	0.0	0.0	0	0.0	0.0	18.8

Rated Area: State of Massachusetts

Upper	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	42.7
Unknown	0	0.0	98.4	0	0.0	98.8	0	0.0	98.9	0	0.0	99.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table	135 - Distr	ibution of 2	022 and 20	023 Home	Mortgage	Lending E	By Borrow	er Income Le	vel				
					Assessm	ent Area:	Massachu	setts							
					Bank A	And Aggreg	ate Loans E	By Year							
Borrower			2022						2	2023			Families by Family		
Income Level	Ва	nk	Agg	Ban	k	Agg	Ва	nk	Agg	Ban	k	Agg	Income %		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%			
					Н	ome Purch	ase Loans								
Low															
Middle 1 0.6 20.7 734 0.7 16.1 0 0.0 19.2 0 0.0 13.9															
Upper 1 0.6 45.0 360 0.4 55.7 2 0.9 40.9 1,930 1.5 47.7															
Unknown	166	96.0	15.4	96,616	97.1	17.8	200	91.3	25.4	117,879	94.5	31.6	0.0		
Total	173	100.0	100.0	99,547	100.0	100.0	219	100.0	100.0	124,699	100.0	100.0	100.0		
						Refinance	Loans								
Low	2	6.9	9.3	428	2.0	4.8	3	10.7	7.0	684	4.6	2.8	22.0		
Moderate	0	0.0	20.2	0	0.0	13.3	3	10.7	12.7	1,284	8.6	6.0	15.5		
Middle	1	3.4	21.1	256	1.2	16.8	4	14.3	16.6	2,038	13.6	9.6	19.4		
Upper	3	10.3	38.0	3,197	15.3	49.5	0	0.0	29.9	0	0.0	28.0	43.2		
Unknown	23	79.3	11.5	17,069	81.5	15.6	18	64.3	33.8	10,997	73.3	53.6	0.0		
Total	29	100.0	100.0	20,950	100.0	100.0	28	100.0	100.0	15,003	100.0	100.0	100.0		
					Hon	ne Improve	ment Loan	s							
Low	0	0.0	6.1	0	0.0	3.5	0	0.0	6.5	0	0.0	2.8	22.0		
Moderate	0	0.0	16.0	0	0.0	10.0	0	0.0	16.0	0	0.0	7.9	15.5		

Rated Area: State of Massachusetts

Middle	0	0.0	24.8	0	0.0	18.7	0	0.0	23.7	0	0.0	14.7	19.4
Upper	0	0.0	50.5	0	0.0	59.9	0	0.0	45.5	0	0.0	47.9	43.2
Unknown	2	100.0	2.7	2,250	100.0	7.9	1	100.0	8.3	740	100.0	26.7	0.0
Total	2	100.0	100.0	2,250	100.0	100.0	1	100.0	100.0	740	100.0	100.0	100.0
					Tota	l Home Mo	rtgage Loar	ns					
Low	7	3.4	6.1	2,265	1.8	2.7	11	4.4	4.5	2,354	1.7	1.4	22.0
Moderate	0	0.0	16.6	0	0.0	9.9	12	4.8	12.2	4,504	3.2	5.8	15.5
Middle	2	1.0	21.5	990	0.8	16.3	4	1.6	18.9	2,038	1.4	12.6	19.4
Upper	4	1.9	43.9	3,557	2.9	54.6	2	0.8	38.1	1,930	1.4	42.6	43.2
Unknown	194	93.7	12.0	116,502	94.5	16.5	223	88.5	26.2	131,802	92.4	37.5	0.0
Total	207	100.0	100.0	123,314	100.0	100.0	252	100.0	100.0	142,628	100.0	100.0	100.0

		Table 13	6 - Distri	bution of 20	022 and 2	2023 Hon	ne Mortgag	e Lendin	g By Borr	ower Incon	ne Level		
					Assessi	ment Are	a: Massach	usetts					
					Bank Aı	nd Aggreg	ate Loans By	Year					
Borrower Income			2022						20	23			Families by Family
Level	Ва	nk	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	rpose LOC						
Low	0	0.0	5.6	0	0.0	3.3	0	0.0	6.5	0	0.0	3.0	22.0
Moderate	0	0.0	15.2	0	0.0	9.0	0	0.0	15.1	0	0.0	7.4	15.5
Middle	0	0.0	24.7	0	0.0	18.7	0	0.0	20.8	0	0.0	13.6	19.4
Upper	0	0.0	52.4	0	0.0	65.8	0	0.0	46.9	0	0.0	54.1	43.2
Unknown	3	100.0	2.0	567	100.0	3.1	2	100.0	10.7	1,611	100.0	21.9	0.0
Total	3	100.0	100.0	567	100.0	100.0	2	100.0	100.0	1,611	100.0	100.0	100.0
					Othe	er Purpose	Closed/Exe	mpt					
Low	0	0.0	7.5	0	0.0	2.5	0	0.0	7.7	0	0.0	2.7	22.0
Moderate	0	0.0	17.8	0	0.0	5.7	0	0.0	18.5	0	0.0	4.8	15.5
Middle	0	0.0	20.3	0	0.0	8.7	0	0.0	25.8	0	0.0	9.4	19.4

Rated Area: State of Massachusetts

Upper	0	0.0	48.2	0	0.0	66.9	0	0.0	35.4	0	0.0	39.2	43.2
Unknown	0	0.0	6.3	0	0.0	16.2	2	100.0	12.6	575	100.0	44.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	575	100.0	100.0	100.0
					P	urpose N	ot Applicable						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.0	22.0
Moderate	0	0.0	2.3	0	0.0	2.5	0	0.0	0.2	0	0.0	0.1	15.5
Middle	0	0.0	1.1	0	0.0	1.4	0	0.0	0.0	0	0.0	0.0	19.4
Upper	0	0.0	1.1	0	0.0	2.5	0	0.0	0.0	0	0.0	0.0	43.2
Unknown	0	0.0	95.5	0	0.0	93.6	0	0.0	99.6	0	0.0	99.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

				- Qualified Inve nt Area: Massac											
	Prior Period Investments Current Period Investments Total Investments Unfunded Commitments Assessment Areas														
Assessment Areas	Assessment Areas # \$ (000's) # \$ (000's) # \$ (000's) % of Total # \$ (000's)														
Full Scope															
Massachusetts	12	3,643	22	15,165	34	18,807	53.0	-	-						
Statewide/Regional	5	4,524	2	12,183	7	16,707	47.0	-	-						

Rated Area: State of Massachusetts

		Tab	le 138 – Dist	ributio			-	System and Nassachuset	· ·	enings/	Closin	gs					
	Deposits		Br	anches					Branch Ope	nings / (Closing	s			Popul	ation	
Assessment Rated Areas Area Branches % of Location of B Rated Incompany							•	# of Branch	# of Branch		U	in Loca es (+ o			Househ		
	Deposits in AA	Dianches	Branches in AA	Low	Mod	Mid	Upp	Openings	Closings	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope																	
Massachusetts	100	2	100	50.0	0.0	50.0	0.0	0	0	0	0	0	0	8.2	17.6	34.7	38.1

Rated Area: State of Nevada

Table 139 – Lending Volume of Reported Loans

Retail Lending Evaluation Period: January 1, 2020 to December 31, 2023

Community Development Lending Evaluation Period: January 1, 2021 to August 12, 2024

Assessment Area: Nevada

Assessment Areas	% of Rated	Small Bus	siness Loans	Small	Farm Loans	All HM	IDA Loans		mmunity pment Loans			% of Rated
Assessment Areas	Area Loans	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	Deposits
Full Scope												
Nevada	100	148	43,901	0	0	1,587	427,120	23	94,312	1,758	565,333	100
Regional/Statewide								8	143,925			

Table 140 - Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Nevada

					ASSE	essillelli A	ilea. iveva	ua					
					Bank A	And Aggreg	ate Loans E	By Year					
Geographic			2	020					2	021			Total
Income Level	Ва	ınk	Agg	Ban	ık	Agg	Ва	nk	Agg	Ban	k	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	2	5.7	2.9	174	3.8	3.0	1	2.4	3.0	220	2.8	3.2	3.9
Moderate	8	22.9	18.3	775	17.1	21.9	10	24.4	18.9	4,006	51.0	21.7	21.7
Middle	15	42.9	38.1	1,858	41.0	39.3	19	46.3	38.4	2,687	34.2	39.2	38.5
Upper	10	28.6	40.1	1,726	38.1	35.1	11	26.8	39.0	936	11.9	35.3	35.3
Unknown	0	0.0	0.3	0	0.0	0.5	0	0.0	0.4	0	0.0	0.6	0.6
Tract-Unk	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	0	0.0	0.1	
Total	35	100.0	100.0	4,533	100.0	100.0	41	100.0	100.0	7,849	100.0	100.0	100.0

Rated Area: State of Nevada

Table 141 - Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography	

Assessment Area: Nevada

					Bank A	And Aggreg	ate Loans E	By Year					
Geographic			2	022					2	023			Total
Income Level	Ва	ank	Agg	Bar	k	Agg	Ва	ınk	Agg	Ban	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	3	15.0	3.2	920	14.8	3.9	2	3.8	2.8	40	0.2	3.5	4.6
Moderate	1	5.0	22.4	15	0.2	24.3	2	3.8	23.0	969	3.8	24.2	23.7
Middle	7	35.0	34.6	1,480	23.8	32.6	6	11.5	33.8	890	3.5	32.9	36.7
Upper	9	45.0	39.4	3,799	61.1	39.0	42	80.8	39.9	23,406	92.5	38.9	34.8
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.4	0.2
Tract-Unk	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	
Total	20	100.0	100.0	6,214	100.0	100.0	52	100.0	100.0	25,305	100.0	100.0	100.0

		Table	e 142 - Dis	tribution of	2020 and	2021 Hon	ne Mortga	ige Lendin	g By Incor	me Level of (Geograph	у			
					Asse	ssment Aı	rea: Nevad	da							
					Bank A	and Aggreg	ate Loans B	By Year							
Geographic			2	020					2	021			Owner Occupied		
Income Level	Ва	Ink Agg Bank Agg Bank Agg Bank Agg #% #% \$(000) \$% \$% # #% \$(000) \$% \$%													
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	Units %		
					Н	ome Purch	ase Loans								
Low	3	2.1	1.6	470	1.5	0.9	9	6.5	1.8	1,509	4.7	1.1	1.9		
Moderate	17	11.8	14.2	2,286	7.5	9.7	45	32.6	14.7	8,070	25.0	10.1	16.9		
Middle	64	44.4	43.0	14,133	46.1	39.5	41	29.7	44.1	9,463	29.3	40.5	41.7		
Upper	60	41.7	41.2	13,741	44.9	49.8	43	31.2	39.3	13,290	41.1	48.2	39.5		
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0			

.		1		22.522	100.0	1.00.0					100.0		100.0
Total	144	100.0	100.0	30,630	100.0	100.0	138	100.0	100.0	32,332	100.0	100.0	100.0
		1	1			Refinance	Loans	1	ı		1	1	П
Low	4	6.3	0.7	455	3.5	0.4	1	1.4	0.8	220	1.4	0.5	1.9
Moderate	12	18.8	8.4	1,611	12.3	5.8	21	30.4	10.4	3,495	22.7	7.2	16.9
Middle	32	50.0	40.5	6,099	46.4	36.4	29	42.0	42.3	6,947	45.2	37.9	41.7
Upper	16	25.0	50.4	4,976	37.9	57.2	18	26.1	46.5	4,708	30.6	54.3	39.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	64	100.0	100.0	13,141	100.0	100.0	69	100.0	100.0	15,370	100.0	100.0	100.0
					Hon	ne Improve	ment Loan	s					
Low	0	0.0	0.5	0	0.0	0.6	0	0.0	0.7	0	0.0	0.4	1.9
Moderate	0	0.0	9.0	0	0.0	7.4	0	0.0	8.9	0	0.0	7.0	16.9
Middle	5	83.3	35.7	848	85.5	29.9	6	50.0	37.0	1,025	37.3	31.7	41.7
Upper	1	16.7	54.8	144	14.5	62.1	6	50.0	53.4	1,725	62.7	60.9	39.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	992	100.0	100.0	12	100.0	100.0	2,750	100.0	100.0	100.0
						Multifam	nily Loans						Multi-family Units %
Low	0	0.0	24.3	0	0.0	16.9	0	0.0	24.6	0	0.0	6.2	11.4
Moderate	1	100.0	38.8	313	100.0	37.7	0	0.0	36.2	0	0.0	31.4	37.9
Middle	0	0.0	26.2	0	0.0	31.2	2	100.0	27.7	3,905	100.0	43.1	32.7
Upper	0	0.0	9.7	0	0.0	14.1	0	0.0	10.8	0	0.0	19.4	17.3
Unknown	0	0.0	1.0	0	0.0	0.1	0	0.0	0.8	0	0.0	0.0	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	313	100.0	100.0	2	100.0	100.0	3,905	100.0	100.0	100.0
	•				Tot	al Home M	ortgage Lo	ans					Owner Occupied Units %
Low	7	3.1	1.0	925	1.9	1.0	10	4.0	1.3	1,729	3.0	0.9	1.9
Moderate	33	14.4	10.8	4,483	9.4	8.0	71	28.6	12.1	11,668	20.4	9.2	16.9

Middle	106	46.3	41.5	21,868	46.0	37.6	90	36.3	42.9	22,576	39.4	39.0	41.7
Upper	83	36.2	46.7	20,223	42.6	53.4	77	31.0	43.7	21,316	37.2	50.9	39.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	229	100.0	100.0	47,499	100.0	100.0	248	100.0	100.0	57,289	100.0	100.0	100.0

	1	able 143	- Distribu	ition of 202	0 and 20	21 Home	Mortgage	Lending E	By Incom	e Level of G	eography	/	
					Ass	essment	Area: Neva	ıda					
					Bank Aı	nd Aggreg	ate Loans By	Year					
Geographic Income			20	20					20:	21			Owner Occupied Units
Level	Baı	nk	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	rpose LOC						
Low	0	0.0	0.5	0	0.0	0.1	0	0.0	0.5	0	0.0	0.3	1.9
Moderate	2	22.2	9.0	178	12.6	5.4	5	22.7	6.4	103	5.3	3.2	16.9
Middle	4	44.4	37.4	689	48.7	30.1	9	40.9	38.4	710	36.3	30.4	41.7
Upper	3	33.3	53.1	549	38.8	64.2	8	36.4	54.6	1,144	58.5	65.7	39.5
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.4	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	9	100.0	100.0	1,416	100.0	100.0	22	100.0	100.0	1,957	100.0	100.0	100.0
					Othe	er Purpose	Closed/Exe	mpt					
Low	0	0.0	0.8	0	0.0	0.3	0	0.0	0.9	0	0.0	0.3	1.9
Moderate	1	20.0	12.2	95	9.4	5.4	0	0.0	8.6	0	0.0	3.3	16.9
Middle	1	20.0	37.0	99	9.8	24.7	3	60.0	37.6	526	53.9	17.2	41.7
Upper	3	60.0	49.9	813	80.7	69.4	2	40.0	52.9	449	46.1	79.2	39.5
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	1,007	100.0	100.0	5	100.0	100 .0	975	100.0	100.0	100.0

Rated Area: State of Nevada

					Р	urpose No	ot Applicable	!					
Low	0	0.0	1.4	0	0.0	0.9	0	0.0	3.0	0	0.0	2.1	1.9
Moderate	0	0.0	17.6	0	0.0	12.3	0	0.0	22.0	0	0.0	19.6	16.9
Middle	0	0.0	49.6	0	0.0	47.9	0	0.0	47.0	0	0.0	44.4	41.7
Upper	0	0.0	31.4	0	0.0	38.9	0	0.0	28.0	0	0.0	33.9	39.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

		Table 144	4 - Distribu	ution of 202	2 and 202	3 Home M	lortgage L	ending By	Income L	evel of Geog	raphy		
					Asse	ssment Ar	ea: Neva	da					
					Bank A	And Aggreg	ate Loans E	By Year					
Geographic			2	022					2	023			Owner
Income Level	Ba	ınk	Agg	Bar	nk	Agg	Ва	nk	Agg	Ban	k	Agg	Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	J Cines 75
					Н	ome Purch	ase Loans						
Low	27	8.4	2.6	7,494	7.6	1.6	12	2.4	2.3	3,162	1.9	1.4	2.4
Moderate	102	31.8	17.4	28,729	29.0	12.8	162	32.6	16.4	47,701	29.1	12.2	15.7
Middle	122	38.0	38.0	37,515	37.9	34.5	233	46.9	36.1	76,491	46.7	32.4	42.7
Upper	70	21.8	41.9	25,320	25.6	50.9	90	18.1	45.0	36,433	22.2	53.8	39.0
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	321	100.0	100.0	99,058	100.0	100.0	497	100.0	100.0	163,787	100.0	100.0	100.0
						Refinance	Loans						
Low	4	4.5	2.0	833	3.9	1.2	1	2.9	2.1	181	2.3	1.0	2.4
Moderate	25	28.1	15.0	4,999	23.2	10.9	14	41.2	16.5	2,796	35.7	18.1	15.7
Middle	38	42.7	44.6	8,688	40.3	39.9	13	38.2	42.4	2,675	34.2	31.8	42.7

	-	1		1	1		1	1		1		,	T
Upper	22	24.7	38.2	7,017	32.6	47.7	6	17.6	38.8	2,179	27.8	48.9	39.0
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	89	100.0	100.0	21,537	100.0	100.0	34	100.0	100.0	7,831	100.0	100.0	100.0
					Hon	ne Improve	ment Loan	ıs					
Low	0	0.0	1.1	0	0.0	0.9	1	5.9	1.3	73	1.7	1.0	2.4
Moderate	2	18.2	10.1	335	13.6	8.4	3	17.6	12.5	305	7.1	10.2	15.7
Middle	6	54.5	37.5	1,281	52.0	31.7	7	41.2	39.2	779	18.3	33.2	42.7
Upper	3	27.3	51.1	848	34.4	58.8	6	35.3	46.9	3,111	72.9	55.3	39.0
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	0	0.0	0.3	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	11	100.0	100.0	2,464	100.0	100.0	17	100.0	100.0	4,268	100.0	100.0	100.0
						Multifam	nily Loans						Multi-family Units %
Low	1	25.0	31.5	260	1.8	9.7	0	0.0	14.6	0	0.0	14.6	14.5
Moderate	3	75.0	39.4	14,000	98.2	30.9	0	0.0	33.3	0	0.0	14.4	37.8
Middle	0	0.0	22.8	0	0.0	46.0	0	0.0	22.9	0	0.0	49.2	31.5
Upper	0	0.0	6.3	0	0.0	13.5	0	0.0	29.2	0	0.0	21.8	15.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	14,260	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Tot	al Home M	lortgage Lo	ans					Owner Occupied Units %
Low	37	7.5	2.2	8,751	6.2	2.0	19	3.1	2.2	4,055	2.2	1.7	2.4
Moderate	164	33.1	15.8	48,321	34.3	13.1	203	33.0	15.8	51,959	28.7	13.0	15.7
Middle	187	37.8	40.1	48,858	34.6	36.4	283	46.0	37.5	80,823	44.6	32.7	42.7
Upper	107	21.6	41.7	35,077	24.9	48.2	109	17.7	44.4	44,213	24.4	52.5	39.0
Unknown	0	0.0	0.1	0	0.0	0.2	1	0.2	0.1	275	0.2	0.2	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	495	100.0	100.0	141,007	100.0	100.0	615	100.0	100.0	181,325	100.0	100.0	100.0

Rated Area: State of Nevada

Table 145 - Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography **Assessment Area: Nevada Bank And Aggregate Loans By Year** 2022 2023 **Owner Occupied Units Geographic Income** Level Bank Agg Bank Agg Bank Agg Bank Agg \$% # \$(000) # #% \$(000) \$% #% #% \$% Other Purpose LOC 5 7.7 0.7 0.5 0.5 164 6.8 3.7 0.8 10 2.4 Low 0.4 15.7 32 49.2 9.8 258 10.7 5.3 22 797 7.3 Moderate 40.7 10.7 42.5 Middle 19 29.2 37.2 815 33.9 31.3 25 46.3 39.1 125 6.7 31.0 42.7 48.5 4 35.7 39.0 Upper 9 13.8 52.2 1,167 62.8 7.4 49.3 669 61.0 14.7 Unknown 0 0.0 0.2 0 0.0 0.2 1 1.9 0.1 275 0.1 0.2 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0.0 Tract-Unk Total 65 100.0 100.0 2,404 100.0 100.0 54 100.0 100.0 1,876 100.0 100.0 100.0 Other Purpose Closed/Exempt Low 0 0.0 1.1 0 0.0 0.4 3 23.1 1.8 629 17.7 1.2 2.4 Moderate 0 0.0 11.2 0 0.0 6.7 2 15.4 11.9 360 10.1 5.2 15.7 Middle 2 40.0 38.1 559 43.5 20.7 5 38.5 40.7 753 21.1 24.8 42.7 3 60.0 49.5 725 56.5 71.8 3 23.1 45.6 1,821 51.1 68.6 39.0 Upper Unknown 0 0.0 0 0.0 0 0.1 0 0.0 0.2 0.2 0.2 0.4 0.0 0 Tract-Unk 0 0.0 0.0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0.0 Total 5 100.0 100.0 1,284 100.0 100.0 13 100.0 100.0 3,563 100.0 100.0 100.0 **Purpose Not Applicable** 0 0.0 2.5 0 0.0 3.8 0 0.0 2.1 2.4 1.9 0.0 Low Moderate 0 0.0 0 0 25.4 0 0.0 22.5 15.7 18.3 0.0 14.0 0.0 Middle 0 0.0 51.7 0 0.0 48.8 0 0.0 45.4 0 0.0 42.2 42.7 Upper 0 0.0 27.5 0 0.0 35.3 0 0.0 25.4 0 0.0 33.2 39.0 0 0.0 0.0 0 0.0 0 0.0 0.0 0 0.0 0.0 0.2 Unknown 0.0 Tract-Unk 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0

Rated Area: State of Nevada

Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

		Table 146	- Distribu	tion of 2020	0 and 202	1 Small Bւ	usiness Le	nding By I	Revenue S	Size of Busin	esses		
					Asses	sment Are	ea: Nevad	la					
					Bank A	nd Aggreg	ate Loans	By Year					
			2	020					2	021			Total
	Ва	ank	Agg	Bar	nk	Agg	Ва	ank	Agg	Bar	nk	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	6	17.1	40.3	74	1.6	23.5	15	36.6	43.3	1,923	24.5	23.8	92.6
Over \$1 Million	2	5.7		701	15.5		6	14.6		3,437	43.8		6.5
Revenue Unknown	27	77.1		3,758	82.9		20	48.8		2,489	31.7		0.8
Total	35	100.0		4,533	100.0		41	100.0		7,849	100.0		100.0
		1		•	1	By Loan	Size	•					
\$100,000 or Less	22	62.9	91.0	941	20.8	40.4	24	58.5	94.8	723	9.2	46.4	
\$100,001 - \$250,000	7	20.0	5.6	1,129	24.9	20.7	8	19.5	3.1	1,114	14.2	16.7	
\$250,001 - \$1 Million	6	17.1	3.4	2,463	54.3	38.9	9	22.0	2.1	6,012	76.6	36.8	
Total	35	100.0	100.0	4,533	100.0	100.0	41	100.0	100.0	7,849	100.0	100.0	
				Ву	Loan Size a	nd Revenu	es \$1 Milli	on or Less					
\$100,000 or Less	6	100.0		74	100.0		13	86.7		169	8.8		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		2	13.3		1,754	91.2		
Total	6	100.0		74	100.0		15	100.0		1,923	100.0		

Rated Area: State of Nevada

Table 147 - Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses

Assessment Area: Nevada

					Asses	sment Ar	ea: Nevad	ıa					
					Bank A	nd Aggreg	ate Loans I	By Year					
			2	022					2	023			Total
	В	ank	Agg	Bar	nk	Agg	Ва	ank	Agg	Bar	ık	Agg	Businesses %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						By Reve	nue						
\$1 Million or Less	12	60.0	48.7	1,835	29.5	30.7	10	19.2	50.1	221	0.9	31.9	93.5
Over \$1 Million	7	35.0		4,135	66.5		42	80.8		25,084	99.1		5.7
Revenue Unknown	1	5.0		244	3.9		0	0.0		0	0.0		0.8
Total	20	100.0		6,214	100.0		52	100.0		25,305	100.0		100.0
						By Loan	Size						
\$100,000 or Less	11	55.0	96.7	145	2.3	56.2	13	25.0	96.7	306	1.2	56.7	
\$100,001 - \$250,000	1	5.0	2.0	244	3.9	13.6	0	0.0	1.9	0	0.0	13.2	
\$250,001 - \$1 Million	8	40.0	1.3	5,825	93.7	30.1	39	75.0	1.3	24,999	98.8	30.1	
Total	20	100.0	100.0	6,214	100.0	100.0	52	100.0	100.0	25,305	100.0	100.0	
				Ву І	oan Size a	nd Revenu	es \$1 Millio	on or Less					
\$100,000 or Less	10	83.3		135	7.4		10	100.0		221	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	2	16.7		1,700	92.6		0	0.0		0	0.0		
Total	12	100.0		1,835	100.0		10	100.0		221	100.0		

		Table	148 - Disti	ribution of 2		021 Home essment Ar		_	y Borrowe	er Income Le	evel		
					Bank /	And Aggreg	ate Loans B	By Year					
Borrower			2020						2	021			Families by Family
Income Level	Ва	ank	Agg	Ban	ık	Agg	Ва	ank	Agg	Bar	nk	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					н	ome Purcha	ase Loans						
Low	1	0.7	4.1	132	0.4	2.2	12	8.7	3.5	2,456	7.6	1.9	20.7
Moderate	8	5.6	16.8	1,679	5.5	12.4	19	13.8	14.4	4,640	14.4	10.4	18.4
Middle	0	0.0	22.9	0	0.0	20.8	7	5.1	21.3	1,843	5.7	18.9	20.5
Upper	0	0.0	37.0	0	0.0	46.0	3	2.2	40.0	648	2.0	48.8	40.5
Unknown	135	93.8	19.2	28,819	94.1	18.6	97	70.3	20.7	22,745	70.3	20.1	0.0
Total	144	100.0	100.0	30,630	100.0	100.0	138	100.0	100.0	32,332	100.0	100.0	100.0
						Refinance	Loans						
Low	7	10.9	4.2	786	6.0	2.3	23	33.3	6.1	4,343	28.3	3.5	20.7
Moderate	16	25.0	12.5	2,933	22.3	9.0	10	14.5	14.6	1,702	11.1	10.9	18.4
Middle	4	6.3	18.8	665	5.1	16.3	7	10.1	20.1	1,722	11.2	18.0	20.5
Upper	6	9.4	37.8	1,784	13.6	43.3	0	0.0	35.4	0	0.0	42.5	40.5
Unknown	31	48.4	26.8	6,973	53.1	29.0	29	42.0	23.9	7,603	49.5	25.1	0.0
Total	64	100.0	100.0	13,141	100.0	100.0	69	100.0	100.0	15,370	100.0	100.0	100.0
					Hor	ne Improve	ment Loans	s					
Low	0	0.0	5.7	0	0.0	3.7	4	33.3	4.0	644	23.4	2.8	20.7
Moderate	0	0.0	13.1	0	0.0	9.7	0	0.0	9.9	0	0.0	7.9	18.4
Middle	0	0.0	19.6	0	0.0	17.9	0	0.0	19.0	0	0.0	15.5	20.5
Upper	0	0.0	57.9	0	0.0	62.5	0	0.0	63.0	0	0.0	67.2	40.5
Unknown	6	100.0	3.7	992	100.0	6.2	8	66.7	4.1	2,106	76.6	6.6	0.0
Total	6	100.0	100.0	992	100.0	100.0	12	100.0	100.0	2,750	100.0	100.0	100.0
	•	•	•		Tota	l Home Mo	rtgage Loar	ns			•	•	
Low	9	3.9	4.1	1,013	2.1	2.3	42	17.1	5.0	7,661	14.4	2.8	20.7
Moderate	24	10.5	13.7	4,612	9.8	10.2	35	14.2	14.3	6,372	11.9	10.5	18.4

Middle	4	1.8	19.7	665	1.4	17.7	18	7.3	20.4	3,585	6.7	18.2	20.5
Upper	6	2.6	37.1	1,784	3.8	44.0	3	1.2	37.8	648	1.2	45.7	40.5
Unknown	185	81.1	25.4	39,112	82.9	25.8	148	60.2	22.6	35,118	65.8	22.8	0.0
Total	228	100.0	100.0	47,186	100.0	100.0	246	100.0	100.0	53,384	100.0	100.0	100.0

		Table 14	9 - Distril	oution of 20			e Mortgage	_	By Borro	wer Income	Level		
					Asse	essment /	Area: Nevac	la					T
					Bank	And Aggreg	ate Loans By Y	ear					
Borrower Income			2020			1			20			T	Families by Family
Level	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						Other Pu	pose LOC						
Low	0	0.0	6.5	0	0.0	4.0	2	9.1	4.4	122	6.2	3.6	20.7
Moderate	0	0.0	11.1	0	0.0	7.3	6	27.3	8.8	30	1.5	5.2	18.4
Middle	0	0.0	19.0	0	0.0	12.9	4	18.2	18.7	20	1.0	11.5	20.5
Upper	0	0.0	60.4	0	0.0	71.8	0	0.0	61.7	0	0.0	72.2	40.5
Unknown	9	100.0	3.0	1,416	100.0	4.0	10	45.5	6.4	1,785	91.2	7.5	0.0
Total	9	100.0	100.0	1,416	100.0	100.0	22	100.0	100.0	1,957	100.0	100.0	100.0
					Oth	er Purpose	Closed/Exemp	t					
Low	1	20.0	6.3	95	9.4	2.2	1	20.0	9.9	96	9.8	4.5	20.7
Moderate	0	0.0	15.5	0	0.0	7.8	0	0.0	9.9	0	0.0	3.5	18.4
Middle	0	0.0	17.4	0	0.0	8.0	0	0.0	17.6	0	0.0	8.9	20.5
Upper	0	0.0	51.4	0	0.0	66.9	0	0.0	52.4	0	0.0	69.5	40.5
Unknown	4	80.0	9.4	912	90.6	15.1	4	80.0	10.1	879	90.2	13.6	0.0
Total	5	100.0	100.0	1,007	100.0	100.0	5	100.0	100.0	975	100.0	100.0	100.0
		•	•			Purpose No	t Applicable	•	•		•		
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	20.7
Moderate	0	0.0	0.5	0	0.0	0.5	0	0.0	0.4	0	0.0	0.3	18.4
Middle	0	0.0	0.3	0	0.0	0.3	0	0.0	0.1	0	0.0	0.1	20.5

Rated Area: State of Nevada

Upper	0	0.0	0.3	0	0.0	0.6	0	0.0	0.2	0	0.0	0.1	40.5
Unknown	0	0.0	98.6	0	0.0	98.5	0	0.0	98.9	0	0.0	99.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

		Table	150 - Disti	ribution of 2	022 and 20	023 Home	Mortgage	Lending E	By Borrowe	er Income Le	vel		
					Asse	ssment Ar	ea: Nevac	la					
					Bank A	And Aggreg	ate Loans E	By Year					
Borrower			2022						2	.023			Families by Family
Income Level	Ва	ank	Agg	Bar	nk	Agg	Ва	ınk	Agg	Bar	ık	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Н	ome Purch	ase Loans						
Low	29	9.0	2.3	6,584	6.6	1.1	30	6.0	1.6	6,823	4.2	0.7	20.9
Moderate	106	33.0	12.1	32,803	33.1	8.1	164	33.0	10.3	51,024	31.2	6.4	18.0
Middle	45	14.0	21.6	16,686	16.8	18.8	134	27.0	21.8	49,148	30.0	18.4	20.2
Upper	15	4.7	42.1	6,262	6.3	50.7	45	9.1	41.6	17,720	10.8	49.6	40.9
Unknown	126	39.3	21.9	36,723	37.1	21.2	124	24.9	24.7	39,072	23.9	24.9	0.0
Total	321	100.0	100.0	99,058	100.0	100.0	497	100.0	100.0	163,787	100.0	100.0	100.0
						Refinance	Loans						
Low	18	20.2	10.1	3,501	16.3	5.9	5	14.7	6.7	671	8.6	2.6	20.9
Moderate	16	18.0	20.4	3,482	16.2	15.6	16	47.1	18.1	3,392	43.3	9.0	18.0
Middle	7	7.9	23.1	1,665	7.7	21.6	2	5.9	22.7	440	5.6	13.0	20.2
Upper	4	4.5	31.0	1,154	5.4	40.2	2	5.9	36.1	1,284	16.4	29.5	40.9
Unknown	44	49.4	15.4	11,735	54.5	16.7	9	26.5	16.4	2,044	26.1	45.9	0.0
Total	89	100.0	100.0	21,537	100.0	100.0	34	100.0	100.0	7,831	100.0	100.0	100.0
					Hon	ne Improve	ment Loan	s					
Low	0	0.0	5.4	0	0.0	4.1	1	5.9	3.6	85	2.0	2.5	20.9
Moderate	0	0.0	12.4	0	0.0	8.3	1	5.9	13.7	73	1.7	8.3	18.0

Middle	0	0.0	22.4	0	0.0	17.3	1	5.9	23.1	52	1.2	17.5	20.2
Upper	0	0.0	56.2	0	0.0	66.1	0	0.0	52.9	0	0.0	63.5	40.9
Unknown	11	100.0	3.6	2,464	100.0	4.2	14	82.4	6.8	4,058	95.1	8.2	0.0
Total	11	100.0	100.0	2,464	100.0	100.0	17	100.0	100.0	4,268	100.0	100.0	100.0
					Tota	Home Mo	rtgage Loar	ıs					
Low	54	11.0	5.3	10,340	8.2	2.6	43	7.0	2.8	7,846	4.3	1.1	20.9
Moderate	158	32.2	14.7	36,465	28.8	10.2	207	33.7	11.9	55,112	30.4	6.9	18.0
Middle	60	12.2	22.0	18,391	14.5	19.3	156	25.4	21.9	49,920	27.5	17.4	20.2
Upper	26	5.3	39.9	7,590	6.0	48.3	49	8.0	41.8	19,301	10.6	47.0	40.9
Unknown	193	39.3	18.1	53,961	42.6	19.5	160	26.0	21.6	49,146	27.1	27.6	0.0
Total	491	100.0	100.0	126,747	100.0	100.0	615	100.0	100.0	181,325	100.0	100.0	100.0

		Table 15	1 - Distril	bution of 2	022 and 2	2023 Hon	ne Mortgag	ge Lendin	g By Borr	ower Incon	ne Level		
					Ass	essment	Area: Neva	ada					
					Bank Aı	nd Aggreg	ate Loans By	Year					
Borrower Income			2022						20	23			Families by Family
Level	Ва	nk	Agg	Ban	k	Agg	Bar	nk	Agg	Bar	ık	Agg	Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					•	Other Pu	ırpose LOC						
Low	6	9.2	5.7	30	1.2	4.3	5	9.3	4.3	25	1.3	3.3	20.9
Moderate	36	55.4	11.7	180	7.5	5.9	24	44.4	13.8	120	6.4	8.1	18.0
Middle	8	12.3	22.3	40	1.7	14.5	18	33.3	22.2	90	4.8	14.9	20.2
Upper	7	10.8	52.0	174	7.2	64.8	1	1.9	48.1	5	0.3	60.9	40.9
Unknown	8	12.3	8.2	1,980	82.4	10.6	6	11.1	11.5	1,636	87.2	12.9	0.0
Total	65	100.0	100.0	2,404	100.0	100.0	54	100.0	100.0	1,876	100.0	100.0	100.0
					Othe	er Purpose	Closed/Exe	mpt					
Low	1	20.0	6.6	225	17.5	2.6	2	15.4	7.6	242	6.8	3.6	20.9
Moderate	0	0.0	12.7	0	0.0	5.3	2	15.4	16.2	503	14.1	7.4	18.0
Middle	0	0.0	20.6	0	0.0	9.0	1	7.7	23.2	190	5.3	10.8	20.2

Rated Area: State of Nevada

Upper	0	0.0	52.7	0	0.0	66.2	1	7.7	47.2	292	8.2	58.4	40.9
Unknown	4	80.0	7.3	1,059	82.5	16.9	7	53.8	5.9	2,336	65.6	19.8	0.0
Total	5	100.0	100.0	1,284	100.0	100.0	13	100.0	100.0	3,563	100.0	100.0	100.0
					Р	urpose N	ot Applicable	•					
Low	0	0.0	0.8	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	20.9
Moderate	0	0.0	0.6	0	0.0	0.2	0	0.0	1.3	0	0.0	1.2	18.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	20.2
Upper	0	0.0	0.3	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	40.9
Unknown	0	0.0	98.3	0	0.0	98.9	0	0.0	98.8	0	0.0	98.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

				lified Investments Area: Nevada	;				
Assessment Areas	Prior Period	Investments	Current Period	d Investments	То	tal Investmen	its	Unfu Commi	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total	#	\$ (000's)
Full Scope									
Nevada	4	9,649	21	11,929	25	21,578	98.6	-	-
Regional/Statewide	-	-	1	297	1	297	1.4	-	-

Table 153 – Distribution of Branch Delivery System and Branch Openings/Closings Assessment Area: Nevada																	
Assessment Areas	Deposits	Branches						Branch Openings / Closings						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area	Location of Branches by Income Level of Geography (%)				# of Branch	# of Branch	Net Change in Location of Branches (+ or -)				% of Households within each Geography			
			Branches in AA	Low	Mod	Mid	Upp	Openings	Closings	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope	Full Scope																
Nevada	100	1	100	100	0.0	0.0	0.0	0	0	0	0	0	0	6.6	23.8	40.1	29.3