

PUBLIC DISCLOSURE

February 24, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**CommerceWest Bank
RSSD # 3052813**

**2445 McCabe Way, Suite 300
Irvine, CA 92614**

**Federal Reserve Bank of San Francisco
101 Market Street
San Francisco, CA 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

CommerceWest is rated "SATISFACTORY"

The following table shows the performance ratings for the lending and community development tests.

PERFORMANCE LEVELS	PERFORMANCE TESTS	
	LENDING TEST	COMMUNITY DEVELOPMENT TEST
OUTSTANDING		
SATISFACTORY	X	X
NEEDS TO IMPROVE		
SUBSTANTIAL NONCOMPLIANCE		

The major factors supporting CommerceWest Bank ratings include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area credit needs.
- The bank made a majority of its small business loans within the assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes.
- An adequate level of responsiveness to the community development needs of its assessment areas through an adequate level of community development loans and services and donations that target low-to-moderate income individuals. Investments were not considered during this examination because data flowing from the bank was constrained.

INSTITUTION

Description of Institution

CommerceWest Bank (CWB/bank) is headquartered in Irvine, California (CA) with total assets of \$1.2 billion as of September 30, 2024, reflecting strong organic growth of 103.4 percent, since the prior Performance Evaluation dated January 9, 2019. The bank received a satisfactory CRA rating for the prior Performance Evaluation. The bank opened in 2001 under a national charter, regulated by the Office of the Comptroller of the Currency. In November 2012, the bank converted to a state member bank. Since the prior Performance Evaluation, the bank completed a holding company reorganization and is now a wholly owned subsidiary of CW Bancorp. CW Bancorp has no other operating subsidiaries and is a shell holding company which does not provide any key functions to the bank.

CWB is a one branch full-service business bank that focuses on small to medium-sized businesses, primarily within Los Angeles, Orange, and Riverside Counties. Historically, the bank also had a presence in San Diego County with a branch in San Marcos, CA but the bank closed that branch in 2020 to align with its strategy and reliance on technology under a “branchless” model. The bank operates out of one branch in Irvine, CA, which is also the bank’s headquarters.

CWB provides a wide range of commercial banking services, including lines of credit, working capital loans, commercial real estate loans, and Small Business Administration (SBA) 7(a) and 504 guaranteed loans. Other business services include checking, savings, and money market deposit accounts, as well as remote deposit capture, online banking, a concierge service, and cash and treasury management. The bank does not have proprietary ATMs but offers clients access to the MoneyPass ATM network. Consumer loans and deposit accounts are limited and are provided on an accommodation basis to the bank’s business clients. The bank does purchase auto loans with a portfolio totaling \$62.6 million as of September 30, 2024; however, they do not originate auto loans.

Exhibit 1 on the following page represents the bank’s loan portfolio as of September 30, 2024, as reported in the bank’s Consolidated Reports of Condition and Income and illustrates the bank’s commercial lending focus with 63 percent of its loans consisting of either Commercial and Industrial loans or commercial real estate. The bank has not made any changes to its core products; however, since the prior review the bank made a one-time purchase of 1-4 family residential loans from a third party in 2022, totaling approximately \$180.2 million (current balance) as part of a pass-through cash flow strategy which also diversified the bank’s loan portfolio. CWB does not service these loans. A total purchase of \$250 million was approved by the board and the bank made an initial purchase of \$150 million, with an additional \$50 million purchase in 2023. Management closely reviews the purchased loans to ensure that the geographic and credit parameters of the loans fit the profile of the bank.

EXHIBIT 1 LOANS AND LEASES AS OF SEPTEMBER 30, 2024		
Loan Type	\$(‘000s)	%
Commercial/Industrial & Non-Farm Non-Residential Real Estate	475,245	63
Secured by 1-4 Family Residential Real Estate	180,190	24.1
Multi-Family Residential Real Estate	12,259	1.6
Consumer Loans & Credit Cards	62,166	8.3
State, Political Subdivisions and All Other	22,143	3
Total (Gross)	752,003	100.0

Description of Assessment Area

CWB eliminated San Diego County from its assessment area due to the branch closure in 2020. Otherwise, no changes have been made to the primary assessment area consisting of the following counties in their entirety that are part of the Los Angeles-Long Beach Combined Statistical Area (CSA):

- Los Angeles County, also known as the Los Angeles-Long Beach-Glendale, CA Metropolitan Division (MD);
- Orange County (which is south of Los Angeles County), also known as the Anaheim-Santa Ana-Irvine, MD; and
- Riverside County (which is east of Los Angeles County) and is part of the Riverside-San Bernadino-Ontario CA, Metropolitan Statistical Area (MSA). The bank’s assessment area in this MSA is a partial in that it only takes Riverside County. This is considered reasonable based on the bank’s only branch located in Orange County and the bank does not have the bandwidth to include the entire MSA.

As of July 1, 2023, the total population of the bank’s assessment area was 15,291,542.¹ The bank’s market area is highly competitive. As of June 30, 2024, the assessment area had 92 Federal Deposit Insurance Corporation (FDIC)-insured institutions operating 2,223 branches.² The three combined counties (Los Angeles, Orange, and Riverside) had \$707.6 billion in total deposits.³ CWB operates one branch in the market area and held \$991.1 million in deposits, representing 0.14 percent of the deposit market share.

Exhibit 2 on the following page presents key demographic and business information used to help develop a performance context for the assessment area. There are 1,181 low-to-moderate income census tracts representing 32.5 percent of the total census tracts. The majority of the census tracts are upper income, consisting of 1,246 census tracts or 34.3 percent of the total census tracts. Middle income census tracts total 1,116 or 30.7 percent of the total. By income, the assessment area is well diversified with each tranche of census tracts representing approximately one-third of the total census tracts.

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

² FDIC, Summary of Deposits; available from <https://www7.fdic.gov/sod/sodMarketRpt.asp?barItem=2>.

³ IBID.

Businesses by census tracts totaled 87,626. The majority of businesses are within the middle- and upper-income census tracts representing 72.1 percent (63,198) of total businesses. The remaining 28 percent are located within low-to-moderate income tracts. By revenue size, the area is dominated by small businesses (characterized as businesses with revenues of less than \$1 million), representing 92.2 percent of all businesses within the assessment area.

EXHIBIT 2 ASSESSMENT AREA DEMOGRAPHICS ⁴ LOS ANGELES -LONG BEACH ASSESSMENT AREA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	197	5.4	156,011	4.5	43,511	27.9	807,9077	23.1
Moderate-income	984	27.1	905,731	25.9	143,738	15.9	576,339	16.5
Middle-income	1,116	30.7	1,180,150	31.7	92,321	8.3	632,309	18.1
Upper-income	1,246	34.3	1,305,936	37.4	52,649	4.0	1,476,391	42.3
Tract not reported	87	2.4	17,112	0.5	2,299	13.4	0	0
Total AA	3,630	100	3,4692,940	100	334,518	9.6	3,492,940	100
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	250,755	38,890	1.5	15.5	196,415	78.3	15,450	6.2
Moderate-income	1,397,817	454,998	17.3	33.0	836,785	60.6	88,034	6.4
Middle-income	1,704,247	858,897	32.7	50.4	735,824	43.2	109,526	6.4
Upper-income	2,107,212	1,264,077	48.31	60.0	667,268	31.7	175,867	8.3
Tract not reported	64,069	10,097	0.4	15.8	45,667	71.3	8,305	13.0
Total AA	5,506,100	2,626,959	100	47.7	2,481,959	45.1	397,182	7.2
Income Categories	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or Equal to \$1 Million		Greater than \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	26,354	3.3	23,892	3.2	2,328	4.0	134	2.8
Moderate-income	158,744	19.8	144,329	19.5	13,639	23.7	776	16.2
Middle-income	233,352	29.1	214,594	29.0	17,495	30.4	1,263	26.4
Upper-income	365,945	45.6	341,946	46.2	21,510	37.4	2,489	52.0
Tract not reported	17,810	2.2	15,166	2.0	2,518	4.4	126	2.6
Total AA	802,205	100	739,927	100.0	57,490	100.0	4,788	100
Percentage of Total Businesses			92.2		7.2		0.6	
2020 HUD Adjusted Median Family Income ⁵					December 2020 Median Housing Value ⁶			
Los Angeles County			\$98,200		Los Angeles County			\$708,430
Orange County			\$103,000		Orange County			\$950,000

⁴ 2020 U.S. Census and 2020 Dun & Bradstreet Data.

⁵ Department of Housing and Urban Development: <https://www.huduser.gov/portal/datasets/il.html#2020>.

⁶ California Association of Realtors: <https://car.org/aboutus/mediacenter/newrelease/2020>.

Riverside County	\$75,300	Riverside County	\$488,250
Los Angeles – Long Beach-Glendale, CSA	\$77,300	Southern CA ⁷	\$650,000

Economic Conditions

The assessment area can be characterized as being in the mature stage of the business cycle. For the time period reviewed, the area is only expected to have average long-term growth prospects, and its growth trails the United States (U.S.) as a whole.⁸ During the COVID pandemic, the area was significantly impacted, and recovery was slow. Entertainment ground to a halt, and after the pandemic, was further impacted by the writers/actor's strike. The area is extremely diversified; however, with healthcare, entertainment, technology firms, and both the Los Angeles Port and the Long-Beach Port. These two seaports are responsible for handling up to a third of all imports into the U.S. Given the western location of the two ports, they are most exposed to imports from China which has cast a cloud over all major seaports.⁹

Entertainment has been a staple of the area for many years but has come under increasing competition from states such as North Carolina, Michigan, Georgia and Louisiana, all of which have spent millions to attract film productions and it is working.¹⁰ Overall, the industry has changed. According to Film LA, shoot days are down for feature films, television and commercials¹¹. Feature films are becoming less frequent, and the pay-tv industry is losing customers to streaming platforms which have revolutionized the way people consume movies¹².

The assessment area will increasingly rely on the healthcare industry to achieve economic growth, at least in the short-term.¹³ Mount Sinai and UCLA Medical Center consistently rank among the nation's best hospitals and are prominent in medical research. Gains and growth in healthcare is fueled by patients from across the country, especially the western portion of nation which is home to some of the fastest growing populations.¹⁴

Poor demographic trends limit the upside potential of the Los Angeles-Long Beach-Glendale (LOS) assessment area. Decades of out-migration and below-average natural population growth (births minus deaths) resulted in population losses for the sixth consecutive year.¹⁵ Among CA's large economies, LOS has bleakest population outlook.¹⁶ While San Francisco has experienced sharper declines in recent years, LOS's subpar performance extends back more than a decade and does not have tech industry woes to explain the losses, nor is there much expectation of renewed appeal of LOS.¹⁷

⁷ Includes counties which are not in the bank's assessment area but are within the greater market area of the bank.

⁸ Moody's Analytics, Precis Report, Los Angeles-Long Beach-Glendale, CA September 2024.

⁹ IBID.

¹⁰ IBID.

¹¹ IBID.

¹² IBID.

¹³ Moody's Analytics, Precis Report, Los Angeles-Long Beach-Glendale, CA, November 2023.

¹⁴ IBID.

¹⁵ IBID.

¹⁶ IBID.

¹⁷ IBID.

A decline in house prices in 2022 was sharper than the national average but not nearly as large as what occurred in the 2000's.¹⁸ Higher borrowing costs have dinged demand, which has led to a small drop in home prices.¹⁹ However, affordability continues to deteriorate, because although home prices have contracted, they still remain elevated. High prices, soaring mortgage interest rates and sluggish income growth means home buying is slipping further out of reach for many.²⁰ Factors that will keep a solid floor under prices include still-intact demand from first-time homebuyers and the remaining supply of homes that are expected to come onto the market in the coming year.²¹ Supply-side issues which affected the U.S. towards the end of the pandemic has eased, residential permits in LOS continue to accelerate, even as new construction slows nationwide.²² Recent cuts to interest rates by the Federal Reserve has not yet, to date, led to lower mortgage pricing; however, the long-term effect should be a reduction in mortgage costs.

Employment Statistics

EXHIBIT 3 UNEMPLOYMENT RATES 2019-2024						
Area	2019	2020	2021	2022	2023	2024 ²³
Los Angeles-Long Beach-Glendale CA CSA	4.1%	11.3%	8.1%	4.4%	4.8%	5.6%
Los Angeles County, CA	4.5%	12.3%	8.9%	4.9%	5.1%	6.1%
Orange County, CA	2.8%	8.9%	6.0%	3.2%	3.9%	4.1%
Riverside County, CA	4.2%	10.1%	7.3%	4.2%	4.9%	4.9%
CA	4.1%	10.1%	7.3%	4.2%	5.1%	5.4%
United States	3.6%	6.7%	4.1%	3.6%	3.7%	4.1%
<i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i>						

Exhibit 3 above depicts unemployment rate, as of October 2024, was in line with the unemployment rate for the state of CA at 5.6 percent versus 5.4 percent, and unemployment rates in CA are trending above the U.S. unemployment rate of 4.1 percent. Unemployment overall has been trending upwards but remains comparatively low. Despite the Federal Reserve's action to increase interest rates, employment has been relatively stable.

Breaking the assessment area down by county shows a mixed picture. As of October 2024, Los Angeles County's unemployment rate was 6.1 percent, which was above the total assessment area unemployment rate, and CA as a whole. Orange County at 4.1 percent was lower than the assessment area unemployment rate of 5.6 percent. Riverside County also had a lower rate of unemployment at 4.9 percent, compared to assessment area and state unemployment rates. The higher rates of unemployment for both the assessment area and Los Angeles County are reflective of the area's mature business cycle, average growth estimates, and consistently trails the economic outlook for the U.S. and CA.

¹⁸ IBID.

¹⁹ Moody's Analytics, Precis Reports, Los Angeles-Long Beach-Glendale CA, November 2022.

²⁰ IBID.

²¹ IBID.

²² IBID.

²³ October 2024 Unemployment Rate, from Bureau of Labor Statistics (BLS).

During the pandemic years, the unemployment rate in the assessment area was 11.3 percent for 2020 and 8.1 percent for 2021 versus a statewide unemployment rate of 10.1 percent and 7.3 percent, respectively. The area was heavily affected by CA's pandemic response as well as a full stop of the entertainment industry which is a large portion of the Los Angeles County economic drivers. Recovery was slower for the assessment area compared to the U.S. as a whole.

Population Change

As of 2020, the AA represented 39.5 percent of the total population of CA, making it a major driver of economic activity for the state. However, as illustrated in Exhibit 4 below, CA's population increase was 3.9 percent between 2015 and 2020. Los Angeles County had a net out-migration with population declines of 20 basis points. Riverside County saw the biggest growth in population during the period at 5.2 percent and is reflective of lower housing costs in Riverside County and an outmigration from Los Angeles County due in large part to the COVID pandemic (the increase in remote or hybrid work which allowed workers to move to areas with lower housing and cost of living indexes).

EXHIBIT 4 POPULATION CHANGE			
Area	2015 Population	2020 Population	Percent Change
Los Angeles-Long Beach CA CSA	15,452,489	15,619,183	1.1%
Los Angeles County, CA	10,038,388	10,014,009	-0.2%
Orange County, CA	3,116,069	3,186,989	2.3%
Riverside County, CA	2,298,032	2,418,185	5.2%
CA	38,421,464	39,538,223	2.9%
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

According to Moody's,²⁴ poor demographic trends are limiting the economic upside potential for the region. For Los Angeles County, decades of more residents leaving than newcomers arriving, and below-average natural population change (births minus deaths) resulted in population losses for the sixth consecutive year as of year-end 2022.²⁵ Among CA's large economies, Los Angeles has the bleakest population outlook.²⁶

Median Family Income

EXHIBIT 5 MEDIAN FAMILY INCOME CHANGE			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Los Angeles-Long Beach CA CSA	\$73,226	\$84,609	15.5%

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

²⁵ IBID.

²⁶ IBID.

Los Angeles County, CA	\$68,508	\$80,317	17.2%
Orange County, CA	\$93,965	\$106,451	13.3%
Riverside County, CA	\$69,638	\$81,271	16.7%
CA	\$77,267	\$89,798	16.2%

Between 2015 and 2020, the median family income of the AA increased, although at a lesser degree than the state as a whole (15.5 percent versus 16.2 percent). Los Angeles County saw the biggest increase at 17.2 percent. Orange County median income grew only 13.3 percent but as Exhibit 5 above illustrates, Orange County has a higher level of median income compared to the total assessment area and the state. Riverside County saw a median income rise of 16.7 percent, slightly higher than the state increase of 16.2 percent.

Small Business Lending

In March of 2020, the federal Paycheck Protection Program (PPP) was launched by the Treasury Department with the goal of helping small businesses survive the pandemic-related lockdowns.²⁷ As a result, growth in lending occurred within banks of all sizes nationwide. Overall, small banks increased lending to small businesses and small farms by an average of 23 percentage points more than expected during the first half of 2020, and lending by medium and large banks increased by 38 and 35 percentage points more than expected, respectively, during the same time period.²⁸ According to the borrower firms that elected to report their industry, most loans under \$1 million made as of August 2020 were made to businesses in the professional, scientific, and technical services industry, followed by other services (except public administration) industry, the health, automobile and social assistance industry, and the construction industry.

As depicted in Exhibit 6 below, the number of small business loans originated within the AA has increased steadily since the prior 2018 examination, with the pace of loan originations increasing 19.5 percent from 2019 through 2021 (latest data available), slightly ahead of the 17.1 percent increase experienced by CA as a whole during the same time period. Lending to small businesses is critical for the support of the local economy given that small businesses represent 92.2 percent of all businesses in the assessment area are businesses with revenues of \$1 million or less.

EXHIBIT 6 SMALL BUSINESS LOANS			
Area	2019	2020	2021
Los Angeles-Long Beach CA CSA	537,948	555,296	643,105
Los Angeles County, CA	354,890	365,864	427,499
Orange County, CA	127,904	133,695	148,878

²⁷ Federal Reserve Bank of San Francisco, Economic Letter, Small Business Lending during COVID-19, November 23, 2020; available from: <https://www.frbsf.org/economicresearch/publications/economic-letter/2020/november/small-business-lending-during-covid-19/>.

²⁸ Federal Reserve Bank of San Francisco, Economic Letter, Small Business Lending during COVID-19, November 23, 2020; available from: <https://www.frbsf.org/economicresearch/publications/economic-letter/2020/november/small-business-lending-during-covid-19/>.

Riverside County, CA	55,154	55,737	66,728
CA	1,146,375	1,182,917	1,342,194
<i>Source: Federal Financial Institutions Examination Council (FFIEC) Community Reinvestment Act Aggregate Data</i>			

Housing Cost Burden

Exhibit 7 below, reflects the percentages of cost burdened renters and owners within the AA as well as statewide. In particular, the cost burden for renters reflects the need for affordable housing in the area, as a majority of renters (52.3 percent) are spending more than 30 percent or more of their household income on rent. Low-income individuals/families are even more impacted with 81.3 percent of low-income renters paying in excess of 30 percent of their income on housing.

EXHIBIT 7 HOUSING COST BURDEN						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Los Angeles-Long Beach CA CSA	81.3%	49.9%	52.3%	66.9%	47.8%	32.1%
Los Angeles County, CA	80.9%	46.5%	52.4%	67.7%	47.4%	33.4%
Orange County, CA	83%	55.1%	51.2%	63.9%	46.2%	29.5%
Riverside County, CA	82.3%	64.3%	53%	67.5%	51.2%	31%
Anaheim-Santa Ana-Irvine, CA MD	83%	55.1%	51.2%	63.9%	46.2%	29.5%
CA	80.6%	52%	49.5%	65.8%	46.4%	29.3%
<i>Cost Burden is housing cost that equals 30.0 percent or more of household income</i>						
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy</i>						

Credit and Community Development Needs

Small business financing and services for small business owners were identified as critical needs in the assessment area by community contacts with expertise in small business development. The local economy has largely rebounded from setbacks caused by the COVID-19 pandemic; however, high inflation, labor shortages, and other challenges persist for small businesses and startups in the Los Angeles-Orange County CSA. Per one community contact, Los Angeles County, the primary sources of industry remains service, tourism, entertainment, and health care with minimal manufacturing. The cost of living remains high in the assessment area; especially housing (to own or to rent). As a result, many small businesses struggle to find workers who can afford to live in the area. As indicated above, high levels of cost-burdened renters in the assessment area indicate that affordable housing is another critical community need. Exhibit 8 on the following page highlights the Housing Affordability Index for each county in the assessment area.

EXHIBIT 8 HOUSING AFFORDABILITY BY COUNTY AND STATE				
	Los Angeles County ²⁹	Orange County	Riverside County	California
Housing Affordability Index	11%	12%	20%	15%
Minimum Income to Own a Home	\$238,400	\$345,200	\$159,600	\$222,000
Median Family Income	\$83,478	\$107,744	\$84,882	\$96,344
Home Ownership Rates	49.8%	57%	69.8%	55.8%

As the table clearly illustrates, the housing affordability index is very low at CA only at 15 percent. For Los Angeles County and Orange County the housing affordability index is lower than the CA rate. In Riverside, the affordability index is higher due to new construction and the general cost of living being lower compared to Los Angeles and Orange Counties, but the affordability index is still low relative to the population as a whole. Minimum income to own a home is much higher than the median family income of the area and this is most profound in the data for Los Angeles and CA as a whole. Median family income compared to minimum income to own a home had a 35 percent difference in Los Angeles County (reflecting the gap between home ownership and median income), while the state measured in at 43.4 percent. The need for more affordable housing is critical for the counties within CWB's assessment area as it is for CA more generally.

Scope of Examination

CWB's performance was evaluated in accordance with *the Interagency Intermediate Small Institution CRA Examination Procedures*. Performance for intermediate small banks is evaluated under two tests that consider the bank's lending and community development activities. The evaluation period for the lending test was January 1, 2019, through December 31, 2024. The evaluation period for community development loans, investments and services was from September 30, 2018, through February 24, 2025.

The bank's responsiveness to consumer complaints was not evaluated since the bank did not receive any complaints related to its CRA performance during the review period.

The following includes more detail on the scope of the Lending Test and Community Development Test.

LENDING TEST

The lending test was based on the following criteria:

- Loan volume compared to deposits (Loan-to-Deposit Ratio).
- Lending inside versus outside the assessment area (Lending in Assessment Area).
- Dispersion of lending throughout the assessment area (Lending Distribution by Geography) and
- Lending to businesses of different revenue sizes (Lending Distribution by Business Revenue).

The lending test evaluation was based on a representative sample of small business loans originated or renewed from January 1, 2019, through December 31, 2024. A review of 162 small business loans were considered in the evaluation of Lending in Assessment Area. Of that total, 113 small business loans were extended within the bank's assessment areas and were used in the evaluation of Lending Distribution by

²⁹ SOURCE: CALIFORNIA ASSOCIATION OF REALTORS® Data is provided on a county-by-county assessment as well as an overall assessment for the state of California.

Geography and Lending Distribution by Business Revenue. The bank does not originate farm loans so there was no review of farm loans.

The bank was very active in PPP lending that was prevalent during the pandemic years to assist companies seeking to retain employees through the economic downturn as a result of the pandemic. In total, the bank made 677 PPP loans for a total of \$269.3 million which factored heavily into both the Lending test and the Community Development test given our review of loans from 2019 – 2024. These PPP loan originations were far in excess of the organic originations of the bank which is generally between 50 and 60 loans annually.

COMMUNITY DEVELOPMENT TEST

The community development test included an evaluation of the responsiveness of CWB's community development activities to community needs and opportunities as well as the bank's capacity to participate in such activities. The evaluation was based on qualified community development loans, donations, and services provided from September 31, 2018, through February 24, 2025. Again, it should be noted that a majority of these loans were PPP originations.

In addition, six community representatives were contacted in connection with the examination regarding credit needs and market conditions within the assessment areas. Contacts represented organizations working in small business development as well as affordable housing. [REDACTED]

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

CWB's performance under the lending test is considered satisfactory. This rating is based on an analysis of the bank's Loan-to-Deposit (LTD) ratio, the level of lending within the bank's assessment area and a review of lending activity by geography, borrower revenue and loan size.

LOAN-TO-DEPOSIT RATIO

The bank's average Loan-to-Deposit (LTD) ratio for the 24-quarter ending December 31, 2024, was 68.1 percent and was considered reasonable when viewed in the context of economic factors that impacted the bank over the measurement period.

At year-end 2020 the bank had an LTD ratio of only 47.6 percent. This was the result of a high level of PPP lending rolling off the bank's balance sheet and the corresponding deposits that came with the relationships. In general, as we have found in other banks, the deposits gained through PPP loans tend to stay with the bank long after the PPP loans have been paid off. From 2021 through 2024 the LTD ratio hovered in line with the average LTD ratio of 68.4 percent. Specifically, the LTD ratios totaled 62.1 percent, 60.8 percent, 62.2 percent, and 58.8 percent for year-ends 2021, 2022, 2023, and 2024, respectively. The average LTD ratio reflects quarters in which the bank had a large level of PPP loans on the books compared to year-end LTD figures. A review of three peer group banks found that in general, these entities had higher LTD ratios than CWB.

However, based on historic lending levels for the bank, the average LTD ratio is consistent with CWB's lending behavior which drove the determination of reasonableness of the bank's loan-to-deposit ratio.

LENDING IN ASSESSMENT AREA

The bank originated a majority of its sampled small business loans within its assessment area. In general, when viewing lending patterns, the number of loans versus the dollar value of loans is viewed as a better proxy illustrating lending activity. Approximately 69.8 percent of the bank's sampled loans originated within the assessment area, as reflected in Exhibit 9 on the following page. Geographically, the loans originated outside the assessment area during the review period were primarily based in San Diego County, with a minimal level of loans originated to businesses in Northern CA. At the last examination, the bank included San Diego County as an assessment area due to having a branch presence in San Marcos, CA. Although the bank closed the branch in 2020 and removed San Diego County from its assessment area in 2022, the bank maintains existing contacts within San Diego County market and is the primary driver of the 30.2 percent of loans originated outside CWB's assessment area.

EXHIBIT 9 LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREA								
Loan Type	Inside				Outside			
	#	%	\$(‘000s)	%	#	%	\$(‘000s)	%
Small Business	113	69.8	25,133	66.3	49	30.2	\$12,771	33.7
Total Small Business-Related	113	69.8	25,133	66.3	49	30.2	\$12,771	33.7
Total Loans	113	69.8	25,133	66.3	49	30.2	\$12,771	33.7

LENDING DISTRIBUTION BY GEOGRAPHY

Small Business Lending

The bank’s lending reflects a reasonable dispersion of small business loans by geography. Exhibits 10 below & Exhibit 11 on the following page illustrate the bank’s small business lending by census tract income level. Exhibit 10 shows the distribution of loans throughout income census tracts for 2023 and 2024 and Exhibit 11 shows the same information for the years 2020 and 2021 and highlights the effect of PPP Lending during the review period. For 2023 and 2024, there was no lending in low-income census tracts but that is offset by the low level of small businesses within the census tracts (only 3.3 percent). The bank’s lending is definitely skewed towards the Middle- and Upper-income census tract and is above the aggregate in both years.

During the PPP lending years, Exhibit 11 on the following page shows a better penetration of low-to-moderate income census tracts but the bank’s lending patterns are still below aggregate values. While the bank only has one branch in Irvine, CA which is located in an Upper Income census tract, the lower penetration into low- and moderate-income census tracts represent lending opportunities for the bank. Lending for 2023 and 2024 was weighted more heavily when reaching conclusions, as it reflects the bank’s most recent lending activity.

EXHIBIT 10 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY DISTRIBUTION OF 2023 AND 2024													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	##	##	\$(000)	\$%	\$%	#	##	##	\$(000)	\$%	\$%	
Low	0	0.0	3.0	0	0.0	3.1	0	0.0	10.4	0	0.0	10.2	3.3
Moderate	1	33.3	19.5	100	15.3	20.6	1	14.3	34.3	875	33.5	30.0	20.1
Middle	1	33.3	29.4	223	34.2	29.0	1	14.3	29.9	30	1.1	34.9	29.3
Upper	1	33.3	45.9	331	50.7	44.1	5	71.4	25.4	1,707	65.4	24.9	45.3
Unknown	0	0.0	1.9	0	0.0	3.1	0	0.0	0.0	0	0.0	0.0	2.0
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	653	100.0	100.0	7	100.0	100.0	2,612	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

EXHIBIT 11 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY DISTRIBUTION OF 2020 AND 2021													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	##	##	\$(000)	\$%	\$%	#	##	##	\$(000)	\$%	\$%	
Low	2	3.7	4.9	610	5.8	4.9	3	8.1	4.5	528	6.9	5.2	4.8
Moderate	5	9.3	19.7	874	8.3	20.8	7	18.9	20.0	1,100	14.3	21.1	20.1
Middle	31	57.4	26.1	5,033	47.6	28.5	14	37.8	26.3	3,088	40.2	27.8	26.6
Upper	14	25.9	47.4	3,597	34.0	42.9	11	29.7	47.4	2,786	36.3	43.4	46.9
Unknown	2	3.7	1.5	457	4.3	2.5	2	5.4	1.3	180	2.3	2.4	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	54	100.0	100.0	10,570	100.0	100.0	37	100.0	100.0	7,682	100.0	100.0	100.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

LENDING DISTRIBUTION BY BORROWER INCOME AND BUSINESS REVENUE

Small Business Lending

CWB's lending distribution by businesses of different revenue sizes is considered reasonable. As reflected in Exhibit 12 on the following page, the bank originated 28.6 percent of its sampled small business loans to businesses with revenues of \$1 million or less in 2024, compared to an aggregate of 13.4 percent. The majority of small loans were made to companies with revenues in excess of \$1 million (42 percent) in 2024.

Originations by loan size show a distinct preference for larger loan sizes at CWB. The majority of loans were made in the \$250,001 - \$1 million range at 57.1 percent, compared to 42.9 percent of originations below the \$250,000 range during 2024. Further, as illustrated in Exhibit 12, in 2024, 14.3 percent of the bank's loan originations were loans of less than \$100,000 compared to the aggregate value of 80.6 percent. An opportunity exists for smaller businesses who need credit as 92.3 percent of all businesses within the assessment area are companies with annual revenues of \$1 million or less.

EXHIBIT 12 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES DISTRIBUTION OF 2023 AND 2024													
	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	##	##	\$(00 0)	\$%	\$%	#	##	##	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	2	66.7	54.1	431	66.0	33.1	2	28.6	13.4	1,123	43.0	31.1	92.3
Over \$1 Million	0	0.0		0	0.0		3	42.9		1,259	48.2		7.1
Revenue Unknown	1	33.3		223	34.2		2	28.6		230	8.8		0.6
Total	3	100.0		653	100.0		7	100.0		2,612	100.0		100.0
By Loan Size													
\$100,000 or Less	1	33.3	96.5	100	15.3	54.2	1	14.3	80.6	30	1.1	30.3	
\$100,001 - \$250,000	1	33.3	2.0	223	34.2	13.8	2	28.6	11.9	448	17.2	25.6	
\$250,001 - \$1 Million	1	33.3	1.4	331	50.7	32.0	4	57.1	7.5	2,134	81.7	44.1	
Total	3	100.0	100.0	653	100.0	100.0	7	100.0	100.0	2,612	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	1	50.0		100	23.2		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		1	50.0		248	22.1		
\$250,001 - \$1 Million	1	50.0		331	76.8		1	50.0		875	77.9		
Total	2	100.0		431	100.0		2	100.0		1,123	100.0		
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

RESPONSE TO COMPLAINTS

CWB did not receive any CRA-related complaints during the review period. Accordingly, the bank's performance in responding to complaints was not considered in evaluating its overall CRA performance.

Community Development Test

CWB's performance under the community development test is satisfactory. Exhibit 13 on the following page outlines the community development activities of the bank. The performance demonstrates adequate responsiveness to the community development needs of its assessment area through

community development loans, donations, and community development services. Virtually all community service hours were with non-profits located in Orange County, which is logical in that the bank's only branch is in Orange County, however it was noted that outreach could be enhanced with activities in Los Angeles and Riverside Counties.

Overall, the bank's community development lending totaled \$61.6 million, or 5.9 percent of the bank's total loan balance as of December 31, 2024. The majority of qualified community development loans were PPP loans, which helped to protect and retain, by the bank's estimates, 2,258 jobs for low-to-moderate income individuals helping to stabilize economic conditions in the bank's assessment area during the COVID years.

The bank provided \$282,440.00 in donations to a diverse group of 33 different non-profit entities providing a variety of support working directly with low-to-moderate income individuals. Employees also conducted community outreach through volunteer work with multiple non-profits. Over fifty bank employees contributed 930.5 hours volunteering their time to work with community services organizations.

The following examples highlight community development activities primarily conducted in the bank's assessment area and broader regional area:

- A \$1.7 million commercial real estate loan to acquire a strip mall located in a moderate-income census tracts which both employment opportunities and small businesses which cater to low-to-moderate income individuals.
- During the review period the bank originated eight commercial lines of credit, totaling \$6.8 million, which provided working capital to business located in low-to-moderate income census tracts.
- The bank provided donations totaling \$63,900.00 to the Stars & Strips foundation which is a charity tournament event help in Baja, Mexico which is a successful fundraiser that raises money for various non-profits providing essential services to children who live in the bank's assessment area and the broader regional area and also includes non-profits located in Mexico.
- One employee donated 63.5 hours to his time to a non-profit, Home for Refugees, Inc., which is a faith based organization that advocates for resettlement assistance and creates community relationships for on-going support to help alleviate our worldwide displacement crisis. The independent organization is fully funded by private donations.

EXHIBIT 13 COMMUNITY DEVELOPMENT ACTIVITIES						
Assessment Area	Loans		Donations		Services	
	#	\$('000s)	\$	#	#	Hours
Los Angeles-Long Beach CSA	38	\$61,568.1	\$282.4	62	129	930.5
Broader Statewide or Regional Area	3	\$1,450	\$0.0	0	0	0.0
Total	41	\$63,018.1	\$282.4	62	129	930.5

Fair Lending or Other Illegal Practices Review

Concurrent with this CRA evaluation, the Reserve Bank conducted a review of the bank's compliance with consumer protection laws and regulations and found no violations of the substantive provisions of anti-discrimination, fair lending, or other illegal credit practice rules, laws, or regulations that were inconsistent with helping to meet community credit needs.

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 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.