PUBLIC DISCLOSURE

April 14, 2025

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Banc of California
RSSD # 494261

11611 San Vicente Blvd., Suite 500
Los Angeles, California 90049

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.

TABLE OF CONTENTS

APPENDICES

Appendix A: Glossary of Terms
Appendix B: Summary of Ratings
Appendix C: Limited-Scope Assessment Area Market Profiles
Appendix D: CRA Core Tables

INSTITUTION RATING

Institution's Community Reinvestment Act (CRA) Rating

Banc of California is rated "OUTSTANDING"

The following table shows the performance level of Banc of California with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	LENDING TEST*	INVESTMENT TEST	SERVICE TEST
OUTSTANDING	X	X	
HIGH SATISFACTORY			X
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.
- Geographic distribution of loans reflects good penetration throughout the assessment areas.
- Adequate distribution of loans among businesses of different income levels.
- Demonstrated leadership in making community development loans that helped address the critical needs of affordable housing and support of 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.
- Readily accessible retail banking services, including low- and moderate-income areas, as well as relatively high levels of community development services that benefited low- and moderate-income individuals and small businesses.

INSTITUTION

Description of Institution

Banc of California (BOC/bank) is a state-chartered commercial bank headquartered in Los Angeles, California with assets of $33.5 billion as of December 31, 2024. The bank is a wholly owned subsidiary of Banc of California, Inc., a one-bank holding company. The bank does not have any banking-related affiliate or subsidiary relationships relevant to the CRA evaluation. In December of 2023, BOC, formerly a $9.2 billion (as of September 30, 2023) institution, merged with Pacific Western Bank (PWB) that had total assets of $36.7 billion as of September 30, 2023. The combined bank then reduced its asset size from $45.9 billion down to $33.5 billion. This merger initially increased the branch office network, which was then reduced to 76 branch offices primarily due to overlapping coverage. This merger further expanded BOC's reach from solely the state of California to include the states of Colorado and North Carolina.

While BOC does provide consumer products, its main focus is providing commercial banking products and services to businesses of all sizes. Since the substantial majority of the bank's lending and deposit volume is commercial activity, the CRA evaluation was focused on this area. Credit product offerings include commercial real estate, construction and development, lines of credit, Small Business Administration (SBA) loans, asset-based lending, and venture capital/private equity. The bank provides a variety of deposit products for commercial customers including checking, savings, money market, certificates of deposit, and retirement accounts. Other retail products and services include online banking, international banking, merchant services, asset management, automated clearinghouse, and remote deposit capture.

Exhibit 1 below represents the loan portfolio as of September 30, 2024. The loan mix reflects the bank's commercial focus.

EXHIBIT 1		
LOANS AND LEASES AS OF SEPTEMBER 30, 2024		
Loan Type	**$ ('000s)**	**%**
Commercial/Industrial & Non-Farm Non-Residential Real Estate	8,847,999	37.6
Construction & Land Development	3,547,308	15.1
Secured by 1-4 Family Residential Real Estate	2,784,430	11.8
Multi-Family Residential Real Estate	6,037,809	25.6
Farm Land & Agriculture	1,090	0.0
Consumer Loans & Credit Cards	414,407	1.8
State, Political Subdivisions and All Other	1,923,373	8.2
Total (Gross)	**23,556,416**	**100.0**

The bank delineates nine assessment areas across three states. This represents a change from the previous examination of BOC, which only had three assessment areas in California. PWB, however, had nine assessment areas at its previous examination in California, Colorado, and North Carolina. The merged bank kept the delineation previously held by PWB. The bank's current assessment areas are as follows:

- Los Angeles – comprised of Los Angeles, Orange, Riverside, San Bernadino, and Ventura Counties in their entirety. Combined they make up the Los Angeles-Long Beach Combined Statistical Area (CSA).
- Kern – comprised of Kern County in its entirety, which constitutes the Bakersfield Metropolitan Statistical Area (MSA).
- Kings-Fresno – comprised of Kings and Fresno Counties in their entirety. Together they make up the Fresno-Madera-Hanford CSA.
- San Diego – comprised of San Diego County in its entirety, which constitutes the San Diego-Chula Vista-Carlsbad MSA.
- San Luis Obispo – comprised of San Luis Obispo County in its entirety, which constitutes the San Luis Obispo-Paso Robles MSA.
- Santa Barbara – comprised of Santa Barbara County in its entirety, which constitutes the Santa Maria-Santa Barbara MSA.
- Tulare – comprised of Tulare County in its entirety, which constitutes a portion of the Visalia MSA.
- Denver-Arapahoe – comprised of both Denver and Arapahoe Counties in their entirety. Together they comprise the Denver-Aurora CSA.
- Durham-Wake – comprised of both Durham and Wake Counties in their entirety. Together they make up the Raleigh-Durham-Cary CSA.

The bank's largest physical presence remains in the Los Angeles assessment area, where 53 of the 80 branches are located. In each of the remaining California (25 branches collectively) assessment areas, including the Colorado (1 branch) and North Carolina (1 branch) assessment areas, the bank has a more limited branch presence.

BOC received a satisfactory performance rating at its November 15, 2021, CRA examination. PWB received an outstanding performance rating at its January 25, 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 the business strategy, size, financial capacity, and local economic conditions.

Scope of Examination

BOC's performance was assessed in accordance with the Federal Financial Institutions Examination Council's (FFIEC) *Interagency Large Institution CRA Examination Procedures*. As such, the CRA performance evaluation assesses the bank's responsiveness and effectiveness in meeting the credit and community development needs in its assessment areas within the lending, investment, and service tests. This evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as assessment area demographic, economic characteristics, and credit needs.

As previously stated, in December 2023, BOC merged with PWB, thus increasing the bank's asset size, branching, loan, and deposit volumes. Examiners considered this as part of the performance context that prior to December 2023 the bank's operated independently from one another. Examiners combined the data to arrive at a single rating for the merged institution.

The lending test evaluation was based on a representative sample of small business loans originated from January 1, 2020, through December 31, 2023. A total of 16,012 small business loans were considered in the evaluation. Of that total, 14,438 small business loans were extended within the bank's assessment areas. These loans were used in the evaluation of the bank's lending by geography and by business revenue. The evaluation period for community development loans, qualified investments, and community development services was January 26, 2021, through April 14, 2025.

The lending test is weighted more heavily than either the investment or service tests. The lending test evaluation is based on both small business loans 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 lending data is presented in the lending volume tables contained in Appendix D – CRA Core Tables, and these tables are referenced throughout the document. The scope of the review is consistent throughout the performance evaluation, unless otherwise noted.

CRA public evaluations of other financial institutions operating in these same areas were reviewed to help determine the availability of community development opportunities in specific assessment areas. In addition, seven interviews with community representatives were relied upon to provide information regarding credit needs and market conditions within each full-scope assessment area. Contacts primarily represented organizations working in economic and community development.

This evaluation focuses on small business lending reported by the banks during the evaluation period. Because the volume of small farm loans was very low, they were not provided weight in the analysis of the bank's lending record. They were, however, considered during the review and are also presented in the lending tables contained in Appendix D – CRA Core Tables.

Full-scope reviews were conducted on three assessment areas in which the bank operates. The Los Angeles assessment area in California, the Denver-Arapahoe assessment area in Colorado, and the Durham-Wake assessment area in North Carolina all received full-scope reviews. These reviews were used to determine overall performance in the three states in which the bank has full-service branch locations: California, Colorado, and North Carolina and are presented in the report in that order. All other assessment areas received a limited scope review. The Los Angeles assessment area received the greatest weight in the overall performance rating of the bank, as the bank's lending volume in this area comprises approximately 69 percent of its overall lending volume, and 71 percent of the overall deposit volume.

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 three 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 a large majority of the bank's branching, lending, and deposit activity occurred within the Los Angeles, California assessment area, conclusions for the state of California heavily influenced BOC'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

BOC's overall performance under the lending test is outstanding. The Los Angeles assessment area was given the most weight due to branching, loan, and deposit volumes. The rest of the assessment areas were limited in these same categories and therefore received less weight in overall ratings. Lending within the Los Angeles assessment area was excellent, while performance was adequate in the Colorado and North Carolina assessment areas. Geographic distribution of loans was good in the Los Angeles assessment area, and excellent in the Colorado and North Carolina assessment areas. The distribution of loans to businesses of different revenue sizes in the Los Angeles and Colorado assessment areas was adequate while North Carolina was excellent. The Los Angeles assessment area was a leader in making community development loans, while both Colorado and North Carolina assessment areas demonstrated adequate lending.

LENDING ACTIVITY

Overall lending levels reflect excellent responsiveness to assessment area credit needs, primarily driven by activity in the Los Angeles assessment area. Overall loan volumes are displayed in Exhibit 2 below, and volumes within the respective assessment areas are shown in Appendix D attached to this report.

EXHIBIT 2 SUMMARY OF LENDING ACTIVITY JANUARY 1, 2020 TO DECEMBER 31, 2023				
Loan Type	**#**	**%**	**$ ('000s)**	**%**
Small Business	16,012	100	$2,578,540	100
Total Loans	**16,012**	**100**	**$2,578,540**	**100**

Note: Affiliate loans include only loans originated or purchased within the bank's assessment areas.

ASSESSMENT AREA CONCENTRATION

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

		EXHIBIT 3					
		LENDING INSIDE AND OUTSIDE THE ASSESSMENT AREAS					
		JANUARY 1, 2020 TO DECEMBER 31, 2023					
Loan Type	Inside				Outside			
	#	%	$ ('000s)	%	#	%	$ ('000s)	%
Small Business	14,438	90.2	$2,166,897	84	1,574	9.8	$411,642	16
Total Loans	14,438	90.2	$2,166,897	84	1,574	9.8	$411,642	16

Note: Affiliate loans not included.

GEOGRAPHIC AND BORROWER DISTRIBUTION

The geographic distribution of the bank's loans across census tracts of different levels, particularly with low- and moderate-income tracts, is good. This assessment is driven by the bank's good geographic distribution of loans in the Los Angeles assessment area. The Colorado and North Carolina assessment areas are rated excellent.

The distribution of BOC's loans represents adequate penetration among businesses of different sizes. Borrower distribution performance is adequate in the Los Angeles and Colorado assessment areas, while the bank's performance in North Carolina is rated excellent. Lending patterns during the review period generally followed the locations of the bank's branches and concentrations of small local businesses and did not demonstrate any unusual patterns or unexplained lending gaps. Additionally, the bank provided support to small businesses through engagement in the Paycheck Protection Program during the review period.

COMMUNITY DEVELOPMENT LENDING

BOC is a leader in making community development loans, demonstrating excellent responsiveness to the local needs with its assessment areas. Specifically, the bank extended 644 community development loans totaling nearly $4.6 billion throughout its assessment areas. In addition, the bank extended 159 loans totaling $2.3 billion that benefited various broader statewide areas that include at least one of the bank's assessment areas. The community development loans, helped address various community and credit needs, including the revitalization or stabilization of certain geographies and the provision of affordable housing. Multiple loan originations 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. This assessment is driven primarily by the bank's performance in the Los Angeles assessment area. The Colorado and North Carolina assessment areas where the bank has a more limited presence were adequate.

Investment Test

BOC's investment performance rating is outstanding. The bank's level of responsiveness to credit and community development needs through its investment activities is excellent. The bank made an excellent level of qualified community development investments and donations. The bank's activity includes investments in low-income mortgage-backed securities, certificates of deposit to low-income credit unions and minority-owned institutions, low-income housing tax credits (LIHTC), small business investment companies (SBIC), and equity investments in Community Development Financial Institutions

(CDFIs). BOC's qualified investments during the evaluation period totaled approximately $1.1 billion, including $707.3 million in current period investments, and $349.1 million in prior period investments that remain on its books. These investments demonstrate excellent responsiveness to community needs.

The bank also supports community development organizations by making charitable donations. During the evaluation period, the bank made charitable donations to community development organizations totaling approximately $14.8 million on a combined assessment area basis.

Qualified investments, including donations, targeting specific statewide areas and/or assessment areas are discussed in conjunction with the evaluation of these areas. This assessment is driven particularly by the bank's performance in the Los Angeles assessment area. The Colorado and North Carolina assessment areas were rated low satisfactory.

Service Test

BOC's overall performance under the services test is high satisfactory. Its delivery systems are readily accessible to the bank's geographies and individuals of different income levels across the bank's Los Angeles assessment area and reasonably accessible to the Colorado and North Carolina 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 all three of the full-scope assessment areas.

RETAIL BANKING SERVICES

BOC's delivery systems are readily accessible to essentially all portions of its Los Angeles assessment area and reasonably accessible in the Colorado and North Carolina assessment areas. Branch hours and services 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. 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.

Overall, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems to businesses of different income levels across the assessment areas. A consolidation of the bank's branch network during the review period resulted in the closure of 24 branches, including two branches in moderate-income census tracts, 10 branches in middle-income census tracts, 11 branches in upper-income census tracts, and one location in an unknown income census tract. The majority of this consolidation was due to the December 2023 merger, where the two banks had overlapping branch coverage. All of the closed locations were in the state of California. The bank did not open any new branches during the review period.

COMMUNITY DEVELOPMENT SERVICES

Bank employees provided a relatively high level of community development services that were responsive to the community development needs across its assessment areas. During the review period,

employees provided 20,643 hours of community development services to a variety of organizations directly within their assessment areas. This rating is based primarily on the bank's performance within its Los Angeles assessment area; however, both the Colorado and North Carolina assessment areas also provided a relatively high level of community development services.

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 Reserve Bank, however, retains authority to enforce BOC's compliance with the CRA and certain other consumer compliance laws and regulations. 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.

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.
- Good distribution of loans by geography and adequate distribution of loans among businesses of different revenue sizes.
- Extensive use of innovative and/or flexible lending practices in serving assessment area credit needs.
- Excellent levels of qualified investments and grants that address the stated needs for affordable housing, as well as other needs.
- Readily accessible 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. BOC has seven assessment areas in California – Los Angeles, Kern, Kings-Fresno, San Diego, San Luis Obispo, Santa Barbara and Tulare. The Los Angeles assessment area received a full-scope review, while all others received limited scope reviews due to the bank's limited presence and lower level of activity in those areas. The Los Angeles 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.

Examiners utilized the FFIECC *Interagency Large Bank Examination Procedures* to evaluate the bank's CRA performance. The CRA performance evaluation assesses the bank's responsiveness and effectiveness in meeting the credit and community development needs in its assessment areas within the lending, investment, and service tests. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as assessment area demographic characteristics, economic characteristics, and credit needs.

In December 2023, the bank officially merged with PWB. Examiners considered this as part of the performance context that prior to this date, the bank's operated independent from one another. Examiners combined this data to arrive at a single rating for the now combined institution.

Description of Operations in California

California is BOC's predominant market. The bank operated 78 of its 80 branches within the state of California as of June 30, 2024. 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 5,600 branches within the state, holding $1.8 trillion in deposits as of June 30, 2024.[1] The market was dominated by three large national banks that together held over 56.1 percent of deposits.[2] BOC had a relatively small presence in California, ranking 10th in total deposits and representing a market share of 1.34 percent with deposits of $23.6 billion.[3]

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 form 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.[4]

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.[5] 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.[6] California's employment recovery was supported by the logistics industry, as the rise of e-commerce drove demand for transportation and warehousing jobs.[7] 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.[8]

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 mid-wage earners out of the state.[9] 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.[10]

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

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[1]   Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2023; available from: http://banks.data.fdic.gov/bankfind-suite/SOD/marketShare.
[2]   Ibid.
[3]   Ibid.
[4]   Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – March 2020.
[5]   Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2021.
[6]   Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2022.
[7]   Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – March 2021.
[8]   Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – March 2022.
[9]   Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2021.
[10] Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – March 2024.

billions in damages, and disrupted key industries like agriculture and tourism.[11] 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.[12]

High housing costs and a lack of affordable housing remain significant challenges in the state as per the data referenced and input from community contacts. In addition, recovery from the economic challenges discussed present a number of credit needs for small businesses.

Conclusions with Respect to Performance Tests in California

Conclusions regarding BOC's performance in California with respect to lending, investment, and service tests are consistent with the overall conclusions for the bank as a whole. The Los Angeles assessment area accounts for 69 percent of the bank's overall loan volume by dollar volume and 71 percent of overall deposits. As such, the overall conclusions in this report were heavily influenced by the performance in California.

With regard to community development lending, $1.6 billion in community development loans benefited a broader statewide or regional area that includes the Los Angeles assessment area. A majority of these loans were focused on affordable housing, which is a stated need for the community. Examples of community development loans that benefit broader statewide areas include the following:

- A $31.3 million loan to support the construction of a multifamily residential property with 79 new low-income apartments.
- A $25 million line of credit to support a SBIC that specializes in helping small businesses with small market buyouts, growth capital, recapitalization, and acquisitions.

Similarly, $68.3 million in qualified investments benefited a broader statewide or regional area that includes the California assessment areas. These investments were to several small business investment companies with a focus on community impact investing across the country that included one or more of the bank's California assessment areas. The following sections contain specific comments regarding the Los Angeles assessment area.

- Seven investments totaling $35 million in a small business investment company supporting economic development within multiple assessment areas.

Los Angeles Assessment Area Conclusions

DESCRIPTION OF OPERATIONS IN LOS ANGELES

The Los Angeles assessment area is comprised of Los Angeles, Orange, Riverside, San Bernadino and Ventura Counties in their entirety. Combined these counties make up the Los Angeles-Long Beach CSA.

The assessment area is highly competitive. As of June 30, 2024, there were 118 institutions operating 2,544 branches in the assessment area. BOC ranked eighth out of 118 financial institutions in local

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

deposit market share with 2.7 percent.[13] The bank operated 51 of its 76 total branches across the Los Angeles assessment area, which account for approximately 20.7 billion of the banks 35.1 billion total deposit base.[14]

The bank has one branch located in a low-income census tract, 12 branches located in moderate-income census tracts, 19 branches in middle-income census tracts, and 19 branches located in upper-income census tracts.

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

EXHIBIT 4 ASSESSMENT AREA DEMOGRAPHICS[15] LOS ANGELES ASSESSMENT AREA								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	235	5.5	186,329	4.5	52,317	28.1	967,293	23.1
Moderate-income	1,184	27.6	1,101,269	26.4	174,896	15.9	698,840	16.7
Middle-income	1,365	31.8	1,374,390	32.9	114,303	8.3	768,934	18.4
Upper-income	1,405	32.8	1,496,356	35.8	59,768	4.0	1,744,036	41.7
Tract not reported	97	2.3	20,759	0.5	2,779	13.4	0	0
Total AA	**4,286**	**100.0**	**4,179,103**	**100.0**	**404,063**	**9.7**	**4,179,103**	**100.0**
Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	300,492	52,046	1.6	17.3	226,162	75.3	22,284	7.4
Moderate-income	1,675,563	581,890	18.3	34.7	971,617	58	122,056	7.3
Middle-income	2,109,246	1,085,130	34.1	51.4	873,120	41.4	150,996	7.2
Upper-income	2,359,975	1,452,151	45.6	61.5	717,574	30.4	190,250	8.1
Tract not reported	71,625	12,553	0.4	17.5	48,404	67.6	10,668	14.9
Total AA	**6,516,901**	**3,183,770**	**100.0**	**48.9**	**2,836,877**	**43.5**	**496,254**	**7.6**
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	30,857	3.4	27,989	3.3	2,708	4.1	160	3
Moderate-income	186,895	20.3	170,367	20.1	15,600	23.8	928	17.3
Middle-income	281,409	30.6	258,866	30.5	21,071	32.1	1,472	27.4
Upper-income	403,066	43.8	376,657	44.3	23,723	36.1	2,686	50
Tract not reported	18,455	2	15,765	1.9	2,560	3.9	130	2.4
Total AA	**920,682**	**100.0**	**849,644**	**100.0**	**65,662**	**100.0**	**5,376**	**100.0**
Percentage of Total Businesses				**92.3**		**7.1**		**0.6**

Economic Conditions

Similar to the State of California, the Los Angeles 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 COVID-19 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.

The local economy is driven primarily by tourism, logistics and medical services.[16] A strong healthcare base and a growing tech presence provide well-paying jobs within the area.[17] The region also has global ties to entertainment, tourism and fashion.[18] Despite these positive economic factors, the area has seen more residents leaving than newcomers arriving, along with slowing immigration, and below average birth rates which resulted in population losses for the sixth consecutive year in 2022.[19] Among California's large economies, Los Angeles has arguably the bleakest population outlook.[20]

Los Angeles was in the at-risk stage of the business life cycle in 2023.[21] The economy is cooling in step with California as a whole.[22] Job growth is slowing on a year-ago basis.[23] Healthcare remains the leading source of new jobs with support from construction and leisure/hospitality.[24] Mount Sinai and UCLA Medical Center consistently rank among the nation's best hospitals and prominent in medical research.[25]

Population Change

As of 2020, the population in the bank's assessment area represented 47.2 percent of the total population of California. As reflected in Exhibit 5 on the following page, while the overall assessment area population saw minor growth of 1.4 percent from 2015 to 2020, the population in Los Angeles County actually declined by 0.2 percent over this period. Riverside and San Bernadino Counties experienced increases of 5.2 percent and 4.1 percent respectively from 2015 to 2020, outpacing the state of California as a whole.

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[16] Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2023.
[17] Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2023.
[18] Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2023.
[19] Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2023.
[20] Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2023.
[21] Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2023.
[22] Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2023.
[23] Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2023.
[24] Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2023.
[25] Moody's Analytics Precis Report – Los Angeles-Long Beach-Glendale, CA – November 2023.

EXHIBIT 5 POPULATION CHANGE LOS ANGELES ASSESSMENT AREA			
Area	2015 Population	2020 Population	Percent Change
Los Angeles-Long Beach CA CSA 2023	18,388,091	18,644,680	1.4%
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%
San Bernardino County, CA	2,094,769	2,181,654	4.1%
Ventura County, CA	840,833	843,843	0.4%
Riverside-San Bernardino-Ontario, CA MSA	4,392,801	4,599,839	4.7%
California	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

Median Family Income

Census data shows that between 2015 and 2020, median family income increased across the assessment areas; 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 1 percent during that period, the greater assessment area lagged behind by nearly 2 percent. Ventura County experienced the lowest change with less than half the increase realized by all other assessment areas. Exhibit 6 below reflects the change in median family income that occurred in the assessment areas and the State of California during that timeframe.

EXHIBIT 6 MEDIAN FAMILY INCOME CHANGE LOS ANGELES ASSESSMENT AREA			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Los Angeles-Long Beach CA CSA 2023	$72,970	$83,538	14.5%
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%
San Bernardino County, CA	$64,553	$72,465	12.3%
Ventura County, CA	$94,799	$101,160	6.7%
Riverside-San Bernardino-Ontario, CA MSA	$67,201	$76,686	14.1%
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.

Unemployment Rates

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 7 below reflects the unemployment rates of the assessment areas and the state between 2019 and 2023.

EXHIBIT 7 UNEMPLOYMENT RATES LOS ANGELES ASSESSMENT AREA					
Area	2019	2020	2021	2022	2023
Los Angeles-Long Beach CA CSA 2023	4.1%	11.0%	8.0%	4.4%	4.7%
Los Angeles County, CA	4.5%	12.3%	9.0%	5.0%	5.0%
Orange County, CA	2.8%	8.9%	6.0%	3.2%	3.6%
Riverside County, CA	4.2%	10.1%	7.3%	4.2%	4.8%
San Bernardino County, CA	3.9%	9.6%	7.4%	4.2%	4.7%
Ventura County, CA	3.6%	8.7%	6.2%	3.7%	4.3%
Riverside-San Bernardino-Ontario, CA MSA	4.1%	9.9%	7.4%	4.2%	4.7%
California	4.1%	10.1%	7.3%	4.3%	4.8%

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

Housing Cost Burden

The cost burden for renters and owners indicates a need for affordable housing in the assessment areas, 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 areas, as well as the state are considered cost burdened. Exhibit 8 below reflects the percentage of cost burdened renters and owners within the assessment areas and statewide.

EXHIBIT 8 HOUSING COST BURDEN LOS ANGELES ASSESSMENT AREA						
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 2023	82.3%	56.5%	52.2%	68.0%	49.6%	31.3%
Los Angeles County, CA	81.8%	52.2%	52.4%	68.8%	50.0%	33.3%
Orange County, CA	83.4%	61.0%	51.0%	65.8%	46.9%	29.0%
Riverside County, CA	82.6%	69.5%	53.1%	69.7%	52.6%	31.0%
San Bernardino County, CA	83.9%	63.2%	51.7%	66.7%	49.1%	28.3%
Ventura County, CA	80.9%	60.3%	53.2%	65.7%	47.1%	29.8%
Riverside-San Bernardino-Ontario, CA MSA	83.3%	66.2%	52.4%	68.4%	51.0%	29.8%
California	81.1%	56.6%	49.5%	67.3%	47.9%	29.1%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

Credit and Community Development Needs

Community representatives from multiple organizations providing support services to area small businesses located within the bank's Los Angeles assessment area were contacted to provide context for local economic conditions and opportunities for participation by local financial institutions.

Multiple contacts indicated small business credit as a primary credit need in the community, especially for new and very small businesses for both start-up costs and working capital. One contact indicated that the area has many low- and moderate-income census tracts and opportunity zones wherein financial institutions could be more involved in financial literacy training and education, including offering industry specific education. One contact also stated the opportunity for financial institutions to invest more and affordable capital into CDFIs as traditional banks are not suited for the type of lending CDFIs can offer. Affordable housing was also identified as a critical need within the community as housing cost are very high.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOS ANGELES

Lending Test

BOC's performance under the lending test in the Los Angeles assessment area is outstanding. This conclusion is based on excellent levels of lending that were responsive to area credit needs, overall good geographic distributions of loans, and adequate distribution of loans to businesses of different revenue sizes. BOC is a leader in making community development loans that were particularly responsive to the community needs in the Los Angeles market in which it operates.

Lending Activity

Lending levels reflect excellent responsiveness to assessment area credit needs. Overall, BOC extended an excellent number of loans in the Los Angeles assessment area. 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 1,674 small business loans in the Los Angeles assessment area.

Lending Distribution by Geography

Overall lending distribution by geography within the Los Angeles assessment area is good. The bank extended loans within census tracts of all income categories. Lending levels in both low- and moderate-income census tracts were good 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 BOC's branches and business concentrations.

Lending Distribution by Business Revenue

Overall lending distribution by business revenue within the Los Angeles assessment area is adequate. Performance in the years 2020 and 2021 were poor but show an increasing trend in 2022 and 2023 with adequate performance. The overall performance was enhanced by the bank's flexible and innovative loan products that serve very small businesses.

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 Los Angeles assessment area. Lending levels were commensurate with the bank's capacity and opportunities within the assessment area. The bank extended 399 community development loans totaling just under $2 billion during the review period. Loans were responsive to a variety of community development needs with a majority addressing the need for affordable housing. Notable examples of these loans include:

- A $54.9 million loan supporting a LIHTC construction project of 149 income restricted apartment units.
- A $17.1 million economic development loan that supported the creation of 35 low- and moderate-income employment opportunities located in a middle-income tract, bordering a moderate-income tract.
- A $10.1 million loan to revitalize and stabilize a hotel, restaurant, and retail space in LA county. The property is part of the Mid-City Recovery Redevelopment Project and located in a moderate-income tract. This project also helped support job creation for low- and moderate-income individuals.
- A $1.5 million loan to provide funding to improve a teen homeless support center. The facility is a drop-in support center for teens ages 18-24 in need of stable housing. The organization offers housing assistance and support such as counseling, case management, recreational activities, access to education and career prep programs, meals, showers, transportation support, mental health assessments and referrals. The facility is located in a low-income census tract.

Investment Test

BOC's performance under the investment test is outstanding. The bank provided an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors, often in a leadership position. The bank makes extensive use of innovative and/or complex investments to support community development initiatives and exhibits excellent responsiveness to credit and community development needs. The bank made 1,092 qualified investments and donations totaling $374.5 million comprised of $224.3 million in new investments and $150.2 million in investments that remained on the bank's books from the prior period. The bank also has nine investments totaling $31 million which benefited a broader statewide or regional area that includes the assessment area and seven new investments that benefited multiple assessment areas in multiple states including the Los Angeles assessment area totaling $37.3 million. Notable examples of qualified investments that directly benefited the assessment area include the following:

- A $18.8 million investment into a fund that finances the purchase of municipal bonds of a local Los Angeles school district where roughly 84 percent of children receive free or reduced priced lunch.
- A $15 million investment in a LIHTC for a 19 story, 278-unit affordable apartment building in skid row. In addition to housing and infrastructure improvements, the organization provides services to residents that include mental and physical health counseling.
- A $19.9 million investment into a fund that purchases guaranteed multi-family structured pass-through bonds. A majority of the units within these developments are considered to be for low- and moderate-income families.

Service Test

Performance under the service test in the Los Angeles assessment area is high satisfactory. During the review period, the bank's branching activity generally did not adversely affect the accessibility of delivery systems. However, several branches were consolidated after the merger where overlapping coverage was identified. Delivery systems remain readily accessible, and bank employees provided a relatively high level of community development services during the review period.

Retail Banking Services

Retail banking services are readily accessible to the bank's geographies and the hours and services offered do not vary in a way that inconveniences any portion of the Los Angeles assessment area. A full array of business banking products and services is offered at all locations in the Los Angeles assessment area. In addition, delivery systems including ATMs, telephone banking, mobile and online banking, and remote deposit capture provide customers with access to banking services after normal business hours.

The majority of branch closures were consolidations where coverage was overlapping other locations after the merger of BOC and PWB. Of the consolidated locations none were closed in low-income census tracts. One location was closed in a moderate-income census tract and the rest were in middle and upper-income census tracts along with one in an unknown tract.

Community Development Services

BOC provided a relatively high level of services in the Los Angeles assessment area. Bank employees provided a total of 14,343 hours of community development service during the review period. The following are notable examples of the types of services provided in the Los Angeles assessment area:

- A bank employee served as the president of the board for a non-profit organization that provides senior citizens, low-income families with minor children, and homeless individuals with sustainable housing support, healthy food, and healthcare.
- Multiple bank employees presented financial literacy courses to low- and moderate-income individuals and developmentally disabled individuals. The organization's mission is to increase independence and employability through educational, vocational and recreational programs.
- Bank employees serve on the board of multiple non-profit organizations that provide medical and health services for Low- and moderate-income individuals.

Limited-Scope Assessment Area Conclusions

BOC's performance in the assessment areas receiving a limited review is generally below the performance for the overall state of California; however, it does not change the California rating. 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 area. Consequently, performance in these areas did not materially affect the bank's overall lending, investment, and service test performance assessment. Facts and data reviewed, including performance and demographic information, can be found in the tables accompanying this report. Exhibit 9 on the next page includes conclusions for the limited scope assessment areas.

EXHIBIT 9 LIMITED-SCOPE ASSESSMENT AREA CONCLUSIONS			
ASSESSMENT AREA(S)	**LENDING TEST**	**INVESTMENT TEST**	**SERVICE TEST**
Kern MSA	Is Below	Is Below	Is Below
Kings-Fresno CSA	Is Below	Is Below	Is Below
San Diego MSA	Is Below	Is Below	Is Below
San Luis Obispo MSA	Consistent	Is Below	Is Below
Santa Barbara MSA	Consistent	Is Below	Is Below
Tulare MSA	Consistent	Is Below	Is Below

STATE OF COLORADO

CRA Rating for Colorado
Performance in Colorado is rated "Satisfactory"

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

The major factors supporting the institution's rating include:

- Adequate responsiveness to community credit needs and a substantial majority of loans extended within the assessment area.
- Excellent distribution of loans by geography and adequate distribution of loans among businesses of different revenue sizes.
- Adequate levels of community development loans that exhibited adequate responsiveness to the needs of small businesses.
- Adequate levels of qualified investments and grants that addressed the need for 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 the state of Colorado is generally consistent with the overall scope of the CRA examination. As previously noted, the bank has one assessment area in the state of Colorado consisting of Denver and Arapahoe Counties in their entirety. Examination procedures require that a full-scope review be conducted on one or more assessment areas in each state the bank operates branch locations in. Although the bank's overall presence in this area is limited, a full-scope review was conducted to determine the overall state rating.

Examiners utilized the FFIEC *Interagency Large Bank Examination Procedures* to evaluate the bank's CRA performance. The CRA performance evaluation assesses the bank's responsiveness and effectiveness in meeting the credit and community development needs in its assessment areas within the lending, investment, and service tests. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as assessment area demographic and economic characteristics, and credit needs.

In December 2023, the bank officially merged with PWB. Examiners considered this as part of the performance context that prior to this date, the bank's operated independent from one another.

Description of Operations in Colorado

The Colorado assessment area consist of Denver and Arapahoe Counties in their entirety. BOC operates one branch within the assessment area. The bank holds deposits of $158 million, representing just

0.09 percent of the deposit market share as of June 30, 2024.[26] By comparison, there were a total of 125 FDIC-insured financial institutions operating 444 offices with deposits totaling $183 billion.[27] In addition, the top four banks hold 54.1 percent of the market share and 30.7 percent of the branches.[28]

Conclusions with Respect to Performance Tests in Colorado

The Colorado assessment area accounts for 2 percent of the bank's overall loans by dollar volume, and 1 percent of its total deposits. As a result, performance in Colorado had a relatively low influence in determining overall conclusions for the institution. Conclusions regarding BOC's performance in Colorado with respect to the lending, investment, and service tests are based on the bank's performance in the single assessment area which is comprised of Denver and Arapahoe Counties in their entirety.

Colorado Assessment Area Conclusions

DESCRIPTION OF OPERATIONS IN COLORADO

The bank's assessment area consists of Denver County and Arapahoe County in their entirety. The bank has one branch location located roughly 12 miles south of downtown Denver within the Denver Tech Center. This area is known as a hub for technology and telecommunications companies, including both large corporations and startups. The branch is located in an upper-Income census tract surrounded by and in close proximity to middle-income census tracts.

The assessment area is highly competitive. As of June 30, 2024, the two-county assessment area was home to 58 financial institutions operating 301 branches holding $78.1 billion in deposits. BOC, with its single location ranked 39th out of 58, held deposits of $158 million, and had a market share of just 0.2 percent.[29]

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

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26   Federal Deposit Insurance Corporation, Deposit Market Share Report, June 30, 2023; available from: http://banks.data.fdic.gov/bankfind-suite/SOD/marketShare.
27   Ibid.
28   Ibid.
29   Ibid.

EXHIBIT 10								
ASSESSMENT AREA DEMOGRAPHICS[30]								
DENVER-AURORA, CO CSA 2023								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	21	6.2	15,653	5.3	3,109	19.9	23.3	23.3
Moderate-income	99	29.2	92,090	31.1	9,302	10.1	19	19
Middle-income	109	32.2	95,724	32.3	4,266	4.5	20.8	20.8
Upper-income	99	29.2	88,662	29.9	2,107	2.4	36.8	36.8
Tract not reported	11	3.2	4,152	1.4	1,042	25.1	0	0
Total AA	**339**	**100.0**	**296,281**	**100.0**	**19,826**	**6.7**	**100.0**	**100.0**
Income Categories	**Housing Units by Tract**	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	31,692	10,217	3.4	32.2	19,744	62.3	5.5	5.5
Moderate-income	174,061	80,710	26.9	46.4	84,388	48.5	5.1	5.1
Middle-income	180,888	104,364	34.7	57.7	67,955	37.6	4.7	4.7
Upper-income	159,167	101,918	33.9	64	48,111	30.2	5.7	5.7
Tract not reported	13,296	3,327	1.1	25	8,911	67	8	8
Total AA	**559,104**	**300,536**	**100.0**	**53.8**	**229,109**	**41.0**	**5.3**	**5.3**
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	3,759	4.2	3,389	4.1	337	5.3	33	3.6
Moderate-income	20,075	22.3	18,691	22.6	1,242	19.5	142	15.5
Middle-income	27,125	30.1	25,389	30.7	1,481	23.3	255	27.8
Upper-income	34,276	38.1	31,306	37.8	2,551	40.2	419	45.7
Tract not reported	4,821	5.4	4,011	4.8	742	11.7	68	7.4
Total AA	**90,056**	**100.0**	**82,786**	**100.0**	**6,353**	**100.0**	**917**	**100.0**
Percentage of Total Businesses		**91.9**		**7.1**		**1.0**	

Economic Conditions

The local economy is driven primarily by high tech, financial and logistics industries.[31] The area was in the mid expansion category of the business cycle as of November 2024.[32] Some of the top employers in the area include HealthONE, UCHealth, and Lockheed Martin Corp.[33] Elevated interest rates have hampered growth in recent years through reduced deal making and elevated financing costs.[34] Goods transportation and warehousing will contribute modestly to growth in 2025, partially by Amazon's recent purchase of a large warehouse complex near the Denver International Airport, which suggests continued growth .[35]

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[30]   2023 FFIEC Census Data and 2023 D&B information.
[31]   Moody's Analytics Precis Report – Denver-Aurora-Lakewood, CO – November 2024.
[32]   Moody's Analytics Precis Report – Denver-Aurora-Lakewood, CO – November 2024.
[33]   Moody's Analytics Precis Report – Denver-Aurora-Lakewood, CO – November 2024.
[34]   Moody's Analytics Precis Report – Denver-Aurora-Lakewood, CO – November 2024.
[35]   Moody's Analytics Precis Report – Denver-Aurora-Lakewood, CO – November 2024.

Housing is overvalued in Denver which will keep the lid on near-term house price growth, while housing supply shortages have kept explosive gains from early in the pandemic.[36] In 2023 commercial real estate struggled with diminished investment. The struggle to bring workers back to the office has led to elevated vacancy rates. As a result, there has been high profile defaults and appraisers have slashed the value of two of the city's most recognizable skyscrapers.[37]

Overall, and despite challenges, the Colorado market has ample high-wage job opportunities and desirable quality of life which will continue to attract in-migrants over the longer term.[38]

Population Change

As of 2020, the population in the bank's assessment area represented 23.7 percent of the total population of Colorado. As Exhibit 11 below illustrates, population growth has been positive in the bank's assessment area and Denver County has outpaced the state of Colorado as a whole.

EXHIBIT 11 POPULATION CHANGE DENVER-ARAPAHOE ASSESSMENT AREA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Denver-Aurora CO CSA 2023	1,257,964	1,370,592	9.0%
Arapahoe County, CO	608,310	655,070	7.7%
Denver County, CO	649,654	715,522	10.1%
Denver-Aurora-Lakewood, CO MSA	2,703,972	2,963,821	9.6%
Colorado	5,278,906	5,773,714	9.4%

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

Median Family Income Change

Census data shows that between 2015 and 2020, increases in median family incomes within the assessment area outpaced growth of the state as a whole. Denver County realized the largest increase with 22.3 percent, nearly 10 percent above the state as a whole. Exhibit 12 on the following page reflects the change in median family income that occurred in the assessment area and the State of Colorado during that timeframe.

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[36] Moody's Analytics Precis Report – Denver-Aurora-Lakewood, CO – November 2024.
[37] Moody's Analytics Precis Report – Denver-Aurora-Lakewood, CO – November 2024.
[38] Moody's Analytics Precis Report – Denver-Aurora-Lakewood, CO – November 2024.

EXHIBIT 12 MEDIAN FAMILY INCOME CHANGE DENVER-ARAPAHOE ASSESSMENT AREA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Denver-Aurora CO CSA 2023	$80,098	$95,690	19.5%
Arapahoe County, CO	$83,513	$98,402	17.8%
Denver County, CO	$76,243	$93,236	22.3%
Denver-Aurora-Lakewood, CO MSA	$88,302	$103,157	16.8%
Colorado	$81,753	$92,752	13.5%

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.

Unemployment Rates

The unemployment rate of the assessment area was generally in line with the statewide unemployment rate leading up to the COVID-19 pandemic and increased sharply in 2020 due to the subsequent economic fallout. The largest rise in unemployment occurred in Denver County at 7.6 percent. The area recovery generally kept pace with the recovery of the state as a whole and remained in line with the state average coming out of the pandemic. Exhibit 13 below reflects the unemployment rates of the assessment area and the State of Colorado between 2019 and 2023.

EXHIBIT 13 UNEMPLOYMENT RATES DENVER-ARAPAHOE ASSESSMENT AREA					
Area	**2019**	**2020**	**2021**	**2022**	**2023**
Denver-Aurora CO CSA 2023	2.6%	7.5%	5.9%	3.1%	3.2%
Arapahoe County, CO	2.6%	7.3%	5.8%	3.1%	3.1%
Denver County, CO	2.6%	7.6%	5.9%	3.1%	3.3%
Denver-Aurora-Lakewood, CO MSA	2.6%	7.0%	5.5%	3.0%	3.2%
Colorado	2.7%	6.8%	5.5%	3.1%	3.2%

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

Housing Cost Burden

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 both Denver and Arapahoe Counties are in line with the state as a whole. Exhibit 14 on the following page reflects the percentages of cost burdened renters and owners within the assessment area and the State of Colorado.

EXHIBIT 14 HOUSING COST BURDEN DENVER-ARAPAHOE ASSESSMENT AREA						
	Cost Burden - Renters			Cost Burden - Owners		
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Denver-Aurora CO CSA 2023	80.3%	54.5%	45.3%	69.0%	40.2%	22.2%
Arapahoe County, CO	86.8%	57.1%	50.8%	70.0%	41.3%	21.7%
Denver County, CO	76.7%	52.7%	42.3%	68.1%	39.1%	22.7%
Denver-Aurora-Lakewood, CO MSA	82.1%	56.1%	46.6%	66.3%	41.4%	21.2%
Colorado	80.2%	54.4%	46.8%	64.2%	40.6%	21.5%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

Credit and Community Development Needs

Community representatives from multiple organizations within the Colorado assessment area were contacted to provide context for local economic conditions and opportunities for participation by local financial institutions. It was stated that conditions across Colorado remain relatively strong but mixed among geographical areas. Colorado has been one of the fastest growing populations as a state, which has impacted affordability, making it increasingly challenging for low-income households along with small and micro businesses in the state. Homelessness has increased by nearly 50 percent since the pandemic started, which heavily increased the demand for affordable housing well beyond current supply. Furthermore, it was stated that even middle-income families are finding that rental housing is becoming unaffordable.

One contact indicated that there were 22 percent fewer small businesses operating during and due to the pandemic. The pandemic highlighted and grew inequalities in the small business landscape. Microbusinesses fell through the COVID relief cracks because they didn't have an established banking relationship, or they had a less formal financial system. It was highlighted that technical assistance for small businesses is needed. There is a hesitancy for micro/small businesses to take on debt or increase debt, so it would be helpful to have loans that are partially forgivable or with lower interest rates. Additionally, contacts noted that partnerships between banks and non-profit organizations might be of assistance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

Lending Test

BOC's lending test performance in Colorado is low satisfactory. Lending levels are overall adequate in relation to the limited presence in the assessment area. Geographic lending distributions are excellent, and borrower distributions are generally adequate. The overall lending test performance is driven by the lending distributions of small businesses and an adequate level of community development loans.

Lending Activity

The bank's lending activity is considered adequate. The percentage of BOC's small business lending within the assessment area is higher than the percentage of area deposits. Approximately 2 percent in number of the bank's small business loans during the evaluation period were originated within this assessment area.

Lending Distribution by Geography

The geographic distribution of small business loans in Colorado is excellent. Loans were extended within each census tract income category. While performance was excellent during 2021 and 2022, the distribution of loans was adequate in 2020 and good in 2023.

Lending Distribution by Business Revenue

Overall lending distribution by business revenue is adequate in Colorado. Though the trend is getting better over time as the branch ages, performance in 2020 was very poor. The remaining years in the evaluation period saw better results with 2021 and 2022 showing adequate and 2023 was considered good distribution by business revenue.

Community Development Lending

BOC extended an adequate level of community development loans that exhibited adequate responsiveness to community credit needs, despite the bank's limited presence in Colorado. The bank made nine community development loans totaling over $149.2 million in the assessment area. These loans helped to address stated community development needs. Notable community development loans in Colorado include the following:

- A $53.2 million multi-family construction loan located in a low-income neighborhood. The development is building 169-unit complex with 132 of those units being restricted to low- and moderate-income individuals and households.
- A $15.9 million construction loan to build a 61-unit low-income complex located in a low-income neighborhood. All 61-units are dedicated to affordable housing for low- and moderate-income individuals and families.
- A $5.4 million loan to refinance a 49-unit apartment complex located in a low-income census tract. All units serve extremely low-income and homeless individuals. The organization also partners with other organizations to offer mental health, substance abuse, medical and employment services.

Investment Test

BOC's community development investment performance within the Colorado 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 needs in the community. The bank made 100 investments totaling $54.5 million, consisting of $14.4 million prior period investments and $40.1 million in new investments including donations to various organizations. The bank also has two investments totaling $2.7 million from prior period and one new investment totaling $21.3 million which

benefited a broader statewide or regional area that includes the assessment area, and six new investments that benefited multiple assessment areas including this assessment area totaling $49.5 million. Noteworthy examples of qualified investments include the following:

- A $29.1 million investment in a Municipal bond that benefits a local school district with over half of the children receiving free or reduced priced lunch.
- A total of $10 million investment into a CRA-eligible mortgage-backed security that supported the construction of 42 fixed rate rental housing units that support low- and moderate-income individuals.

Service Test

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

Retail Banking Services

BOC's delivery systems are reasonably accessible to the bank's geographies and businesses of different income levels in the Colorado assessment area. Services do not vary in a way that inconveniences customers in the assessment area. The bank offers a full array of business banking products and services out of the bank's single Colorado branch. Delivery systems including an ATM, telephone banking, online, and mobile banking are offered to provide customers with access to banking services after normal business hours.

The bank's one branch is located in an upper-income census tract within a business district known as the Denver Tech Center. The census tracts surrounding the branch are middle-income. There were no changes to the bank's branch location within the assessment area during the review period. Given the bank's limited presence in this large geographical area, its sole branch provides reasonable access in close relation to two main freeways.

Community Development Services

BOC provided a relatively high level of community development services in the Colorado assessment area. During the review period, employees provided 32 services totaling over 709 service hours. Service hours ranged from providing financial literacy education to serving on the board of organizations and providing mentorship to name a few. The following are notable examples of community development services:

- Several employees served as financial literacy instructors providing financial education to low- and moderate-income high school students.
- An employee worked on the fundraising committee for an organization whose mission is to end homelessness for single mothers and their children in the local community.
- An employee helped provide mentorship for small business entrepreneurs at a small business development center.

STATE OF NORTH CAROLINA

CRA Rating for North Carolina
Performance in North Carolina is rated "Satisfactory"

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

The major factors supporting the institution's rating include:

- Levels of lending that demonstrated adequate 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.
- Adequate levels of community development loans that exhibited adequate responsiveness to the needs of small businesses.
- Adequate levels of qualified investments and grants that addressed the need for 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 examination for the state of North Carolina is consistent with the overall scope of the CRA examination. The bank has designated a single assessment area that consists of Durham and Wake Counties in their entirety. Examination procedures require that a full-scope review be conducted on one or more assessment areas in each state the bank operates branch locations in. Although the bank's overall presence in this area is limited, a full-scope review was conducted to determine the overall state rating.

Examiners utilized the FFIECC *Interagency Large Bank Examination Procedures* to evaluate the bank's CRA performance. The CRA performance evaluation assesses the bank's responsiveness and effectiveness in meeting the credit and community development needs in its assessment areas within the lending, investment, and services tests. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as assessment area demographic and economic characteristics, and credit needs.

In December 2023, the bank officially merged with PWB. Examiners considered this as part of the performance context that prior to this date, the bank's operated independent from one another.

Description of Operations in North Carolina

The North Carolina market for financial services is competitive with 85 FDIC-insured financial institutions operating 1,986 branches, holding $693.3 billion in deposits as of June 30, 2024.[39] The top four banks hold 83.9 percent of deposits and 41.2 percent of the branches operating in the state.[40] BOC held $5.3 billion in deposits within the state of North Carolina, representing a market share of only 0.76 percent and ranking 12th out of 85.[41]

Conclusions with Respect to Performance Tests in North Carolina

The North Carolina assessment area accounts for 1 percent of the bank's overall loans by dollar volume, and 18 percent of its total deposits. As a result, performance in North Carolina had a relatively low influence in determining overall conclusions for the institution. Conclusions regarding BOC's performance in North Carolina with respect to the lending, investment, and service tests are based on the bank's performance in the single assessment area which is comprised of Durham and Wake Counties in their entirety.

North Carolina Assessment Area Conclusions

DESCRIPTION OF OPERATIONS IN NORTH CAROLINA

The assessment area consists of Durham County and Wake County in their entirety. BOC operates one branch in the Durham-Wake assessment area which is located in a moderate-income census tract in the downtown area next to the Durham Bulls Athletic Park.

The assessment area is relatively competitive. As of June 30, 2024, there were 36 financial institutions operating 291 branches in the two-county assessment area. BOC ranked 4th out of 36 financial institutions with a deposit market share of 5.1 percent and total deposits of $5.3 billion.[42]

Exhibit 15 on the following page presents key demographic and business information used to help develop a performance context for the assessment area.

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[39]   Federal Deposit Insurance Corporations, Deposit Market Share Report, June 30, 2024; Available from Summary of Deposits – Market Share (fdic.gov).
[40]   Ibid.
[41]   Ibid.
[42]   Federal Deposit Insurance Corporations, Deposit Market Share Report, June 30, 2024; Available from Summary of Deposits – Market Share (fdic.gov).

EXHIBIT 15 ASSESSMENT AREA DEMOGRAPHICS[43] RALEIGH-DURHAM-CARY, NC CSA 2023								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	27	9.1	22,396	6.5	4,704	21	71,255	20.6
Moderate-income	53	17.8	58,122	16.8	6,015	10.3	54,494	15.8
Middle-income	97	32.6	123,160	35.6	6,382	5.2	69,173	20
Upper-income	110	36.9	137,612	39.8	3,399	2.5	150,625	43.6
Tract not reported	11	3.7	4,257	1.2	1,269	29.8	0	0
Total AA	**298**	**100.0**	**345,547**	**100.0**	**21,769**	**6.3**	**345,547**	**100.0**

Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	47,860	12,700	3.8	26.5	30,220	63.1	4,940	10.3
Moderate-income	103,942	50,651	15.1	48.7	46,008	44.3	7,283	7
Middle-income	206,454	121,614	36.4	58.9	71,474	34.6	13,366	6.5
Upper-income	214,123	146,037	43.7	68.2	54,320	25.4	13,766	6.4
Tract not reported	8,540	3,421	1	40.1	4,235	49.6	884	10.4
Total AA	**580,919**	**334,423**	**100.0**	**57.6**	**206,257**	**35.5**	**40,239**	**6.9**

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	4,508	5.8	4,057	5.6	416	8.5	35	4.7
Moderate-income	12,420	16	11,595	16.1	748	15.4	77	10.3
Middle-income	27,618	35.6	25,659	35.7	1,710	35.1	249	33.5
Upper-income	31,902	41.1	29,689	41.3	1,843	37.8	370	49.7
Tract not reported	1,135	1.5	967	1.3	155	3.2	13	1.7
Total AA	**77,583**	**100.0**	**71,967**	**100.0**	**4,872**	**100.0**	**744**	**100.0**
Percentage of Total Businesses			92.8		6.3		1.0	

Economic Conditions

The local economy is driven primarily by high tech, colleges and manufacturing.[44] The area is In the late expansion stage of the business cycle as of December 2024.[45] The area's largest employers include Duke University, Walmart, and UNC-Chapel Hill.[46] Job growth has re-accelerated throughout 2024, resulting in gains nearly double the state and national rate.[47] Healthcare, professional services and state government are leading the charge.[48]

The presence of two renowned universities will ensure stability and provide continued advantages.[49] Duke University and its health system are arguably the mentor areas most important driver, accounting

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43   2023 FFIEC Census and 2023 D&B Information.
44   Moody's Analytics Precis Report – Durham-Chapel Hill, NC – December 2024.
45   Moody's Analytics Precis Report – Durham-Chapel Hill, NC – December 2024.
46   Moody's Analytics Precis Report – Durham-Chapel Hill, NC – December 2024.
47   Moody's Analytics Precis Report – Durham-Chapel Hill, NC – December 2024
48   Moody's Analytics Precis Report – Durham-Chapel Hill, NC – December 2024
49   Moody's Analytics Precis Report – Durham-Chapel Hill, NC – December 2024.

for more than on-tenth of the total employment. Its reputation and that of nearby University of North Carolina-Chapel Hill will keep the area filled with young adults.[50]

Population growth will remain strong but with the increased population there is an increased need for housing which has begun to weigh on affordability. As affordability continues to diminish, it is causing out migration to rural and exurban areas to pick up.[51]

Overall, this economy in the area will cool from recent highs while still outpacing the state and nation. The area universities will provide stability, and tech will remain an engine of growth. Longer term, above-average demographics will keep the area a strong performer, but a diminishing affordability edge will keep a lid on growth.[52]

Population Change

As of 2020, the population in the bank's assessment area represented 13.9 percent of the total population of North Carolina. As Exhibit 16 below illustrates, population growth has been positive in the bank's assessment area and both Durham and Wake Counties have outpaced the state of North Carolina as a whole by over double.

EXHIBIT 16 POPULATION CHANGE DURHAM-WAKE ASSESSMENT AREA			
Area	2015 Population	2020 Population	Percent Change
Raleigh-Durham-Cary NC CSA 2023	1,264,836	1,454,243	15.0%
Durham County, NC	288,817	324,833	12.5%
Wake County, NC	976,019	1,129,410	15.7%
Durham-Chapel Hill, NC MSA	592,263	649,903	9.7%
North Carolina	9,845,333	10,439,388	6.0%

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

Median Family Income Change

Census data shows that between 2015 and 2020, increases in the median family incomes within the assessment area slightly outpaced growth of the state as a whole. Within the assessment area, the largest income growth occurred in Durham County, which was nearly 1 percent above the state as a whole. Exhibit 17 on the following page reflects the change in median family income that occurred in the assessment area and the State of North Carolina.

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[50] Moody's Analytics Precis Report – Durham-Chapel Hill, NC – December 2024.
[51] Moody's Analytics Precis Report – Durham-Chapel Hill, NC – December 2024.
[52] Moody's Analytics Precis Report – Durham-Chapel Hill, NC – December 2024

EXHIBIT 17 MEDIAN FAMILY INCOME CHANGE DURHAM-WAKE ASSESSMENT AREA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Raleigh-Durham-Cary NC CSA 2023	$87,364	$100,148	14.6%
Durham County, NC	$74,164	$83,872	13.1%
Wake County, NC	$92,259	$104,072	12.8%
Durham-Chapel Hill, NC MSA	$74,317	$84,764	14.1%
North Carolina	$63,212	$70,978	12.3%

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.

Unemployment Rates

The unemployment rate of the assessment area was generally in line with the statewide unemployment rate leading up to the COVID-19 pandemic; however, it increased sharply in 2020 due to the subsequent economic fallout. The area recovery generally kept pace with the recovery of the state as a whole and the unemployment rate remained generally in line with the state. Exhibit 18 below reflects the unemployment rates of the assessment area and the State of North Carolina between 2019 and 2023.

EXHIBIT 18 UNEMPLOYMENT RATES DURHAM-WAKE ASSESSMENT AREA					
Area	**2019**	**2020**	**2021**	**2022**	**2023**
Raleigh-Durham-Cary NC CSA 2023	3.4%	6.3%	4.1%	3.1%	3.0%
Durham County, NC	3.4%	6.3%	4.3%	3.2%	3.1%
Wake County, NC	3.4%	6.3%	4.1%	3.1%	3.0%
Durham-Chapel Hill, NC MSA	3.4%	5.9%	4.1%	3.2%	3.0%
North Carolina	3.9%	7.2%	4.9%	3.7%	3.5%

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

Housing Cost Burden

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-income renters in both Durham and Wake Counties of the assessment area is higher than the state as a whole. Exhibit 19 on the following page reflects the percentages of cost burdened renters and owners within the assessment area and the State of North Carolina.

EXHIBIT 19 HOUSING COST BURDEN DURHAM-WAKE ASSESSMENT AREA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Raleigh-Durham-Cary NC CSA 2023	80.9%	42.1%	42.0%	61.9%	31.6%	15.6%
Durham County, NC	76.8%	46.7%	43.5%	61.2%	39.1%	17.3%
Wake County, NC	82.7%	40.2%	41.4%	62.1%	29.6%	15.1%
Durham-Chapel Hill, NC MSA	76.8%	45.5%	43.9%	60.3%	35.5%	17.8%
North Carolina	74.3%	44.0%	41.3%	57.5%	30.2%	17.8%

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

Credit and Community Development Needs

A community representative within the North Carolina assessment area was contacted to provide context for local economic conditions and opportunities for participation by local financial institutions. It was stated that there is a lack of affordable housing, and a low stock of housing in general. There is a plethora of new construction housing, but the prices are high, and interest rates have made it even more challenging to purchase. The increased rates also make it harder for small developers to build homes.

A stated community need is technical assistance and financial literacy for small businesses. There is a need to teach small business owners how to operate a more efficient business and how to gain capital for operating expenses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

Lending Test

BOC's lending test performance in North Carolina is low satisfactory. Lending levels are overall adequate in relation to the limited presence in the assessment area. Geographic lending distributions and borrower distributions are excellent. The overall lending test performance is driven by the lending distributions of small businesses and an adequate level of community development loans.

Lending Activity

The bank's lending activity is considered adequate. The percentage of BOC's small business lending within the assessment area is far below the percentage of area deposits. All deposits for the nationwide venture capital business line, are allocated to the North Carolina branch, which creates the difference in deposits and lending levels. A substantial majority of the bank's small business loans during the evaluation period were originated within this assessment area.

Lending Distribution by Geography

The geographic distribution of small business loans in North Carolina is excellent. Loans were extended within each census tract income category. While performance was excellent during 2021 and 2022, the distribution of loans was adequate in 2020 and good in 2023.

Lending Distribution by Business Revenue

Overall lending distribution by business revenue is excellent in North Carolina. Performance in 2020 was adequate, 2021 was good, while both 2022 and 2023 showed excellent distribution.

Community Development Lending

BOC extended an adequate level of community development loans that exhibited adequate responsiveness to community needs, despite the bank's limited presence in North Carolina. The bank made six community development loans totaling roughly $88 million within the assessment area. These loans helped to address various community development needs. Notable community development loans in North Carolina include the following:

- A $26.7 million loan for a LIHTC project for the acquisition, construction and permanent financing of a 156-unit income restricted affordable housing project for seniors. Located in a low-income tract.
- A $15 million loan established to bridge capital contributions and SBA leverage draws to an approved SBIC.

Investment Test

BOC's community development investment performance within the North Carolina assessment area is low satisfactory. Considering its limited presence in the area, the bank made an adequate level of qualified investments and grants that were responsive to needs in the community. The bank made 104 investments totaling $43.6 million, consisting of $21.4 million prior period investments and $22.1 million in new investments including donations to various organizations. The bank also has seven investments totaling $10.4 million from prior period, and two new investments totaling $7 million which benefited a broader statewide or regional area that includes the assessment area, and nine new investments that benefited multiple assessment areas including this assessment area totaling $57.8 million. Noteworthy examples of qualified investments include the following:

- A $5 million investment in a mortgage-backed security that supports affordable housing in a multifamily property with 252 units dedicated to low-income families.
- An investment into a local minority owned credit union for $500,000.
- A $5 million investment in an SBIC supporting economic development through investments in small businesses within the assessment area.

Service Test

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

Retail Banking Services

BOC's banking services are reasonably accessible to the bank's geographies and do not vary in a way that inconveniences any portion of the area. A full array of business banking products and services are offered in North Carolina. Delivery systems include, telephone banking, online, and mobile banking are offered to provide customers with access to banking services after normal business hours. The branch does not have an ATM in North Carolina, nor does the branch take cash deposits.

The bank has one branch in this assessment area located in a moderate-income census tract. The branch did move locations during the review period from an upper-income tract to a moderate-income tract, however the distance was negligible with the distance being one block from the old location. Given the bank's limited presence in this geographical area, its sole branch provides reasonable access to surrounding area populations.

Community Development Services

Considering its limited presence in North Carolina, BOC provided a relatively high level of community development services in the assessment area. The bank's employees provided a total of 731 hours of community development service during the review period. The following are examples of the types of services provided in North Carolina.

- A bank employee participated on a community investment committee to begin the process of developing procedures for selecting non-profit to provide grant funds to.
- A bank employee has served on the board of an organization that provides employment counseling, job referrals, and post-employment support for unemployed and underemployed individuals such as those with a criminal background or with gaps in employment history.
- An employee serves on the board for an organization with a mission to improve the lives of adults with intellectual and developmental disabilities by promoting and providing access to programs, vocational training, and job opportunities.

APPENDIX A

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.

APPENDIX B

SUMMARY OF RATINGS

SUMMARY OF RATINGS				
STATE	**LENDING TEST RATING**	**INVESTMENT TEST RATING**	**SERVICE TEST RATING**	**OVERALL RATING**
California	Outstanding	Outstanding	High Satisfactory	Outstanding
Colorado	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
North Carolina	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

APPENDIX C

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://banks.data.fdic.gov/bankfind-suite/SOD/marketShare
- FFIEC Adjusted Median Family Income; available from: https://www.ffiec.gov/Medianincome.htm.

Kern Assessment Area

The Kern assessment area consists of Kern County in its entirety and is part of the Bakersfield, California Metropolitan Statistical Area (MSA). Kern County is located North of Los Angeles and Ventura Counties, South of Kings and Tulare Counties, East of San Luis Obispo County, and West of San Bernadino County. Bakersfield is the county seat of Kern County. The area was home to more than an estimated 913,820 people in 2023.

The bank had a limited presence in the market for financial services. There were 16 FDIC-insured financial institutions operating 75 offices that held deposits totaling over $11.7 million in the area as of June 30, 2024. BOC operated one branch in the area and held $124,921 thousand in total deposits, representing 1.06% percent of the deposit market share.

The following exhibit 20 presents key demographic and business information concerning the assessment area.

	EXHIBIT 20 ASSESSMENT AREA DEMOGRAPHICS ASSESSMENT AREA: KERN							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	19	8.1	15,367	7.6	6,803	44.3	47,520	23.5
Moderate-income	65	27.5	56,179	27.8	13,745	24.5	34,432	17.1
Middle-income	70	29.7	60,968	30.2	9,037	14.8	35,259	17.5
Upper-income	74	31.4	67,690	33.5	3,432	5.1	84,728	42
Tract not reported	8	3.4	1,735	0.9	674	38.8	0	0
Total AA	**236**	**100.0**	**201,939**	**100.0**	**33,691**	**16.7**	**201,939**	**100.0**
Income Categories	**Housing Units by Tract**	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	24,130	6,071	3.8	25.2	15,717	65.1	2,342	9.7
Moderate-income	83,085	35,103	21.8	42.2	38,737	46.6	9,245	11.1
Middle-income	91,671	48,810	30.3	53.2	35,064	38.2	7,797	8.5
Upper-income	96,827	70,024	43.5	72.3	20,892	21.6	5,911	6.1
Tract not reported	3,466	1,105	0.7	31.9	2,033	58.7	328	9.5
Total AA	**299,179**	**161,113**	**100.0**	**53.9**	**112,443**	**37.6**	**25,623**	**8.6**
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	1,538	5.7	1,425	5.7	112	6.5	1	0.8

Moderate-income	5,413	20.2	5,042	20.2	347	20	24	18.8
Middle-income	7,292	27.2	6,801	27.3	458	26.4	33	25.8
Upper-income	10,939	40.8	10,237	41	653	37.6	49	38.3
Tract not reported	1,624	6.1	1,438	5.8	165	9.5	21	16.4
Total AA	**26,806**	**100.0**	**24,943**	**100.0**	**1,735**	**100.0**	**128**	**100.0**
Percentage of Total Businesses		**93.1**		**6.5**		**0.5**		

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 BOC's deposits, loans, investments, and branches may be found in the Core Tables.

Kings-Fresno Assessment Area

The Kings-Fresno assessment area consists of both kings and Fresno Counties in their entirety. Together they make up a portion of the Fresno-Matera-Hanford, Combined Statistical Area (CSA). The assessment area is located in the middle of California North of Kern and Tulare Counties and south of Matera County. The area was home to more than an estimated 1.5 million people in 2023.

There were 22 FDIC-insured financial institutions operating 127 offices that held deposits totaling $20.3 million in the area as of June 30, 2024. BOC operated two branches in the area and held $228,381 thousand in total deposits, representing 1.13 percent of the deposit market share.

The following exhibit 21 presents key demographic and business information concerning the assessment area.

EXHIBIT 21 ASSESSMENT AREA DEMOGRAPHICS ASSESSMENT AREA: KINGS-FRESNO								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	26	10.2	22,134	8.6	8,918	40.3	62,242	24.1
Moderate-income	75	29.3	70,642	27.4	18,265	25.9	42,388	16.4
Middle-income	65	25.4	71,052	27.5	9,451	13.3	45,736	17.7
Upper-income	87	34	94,227	36.5	5,221	5.5	107,840	41.8
Tract not reported	3	1.2	151	0.1	39	25.8	0	0
Total AA	**256**	**100.0**	**258,206**	**100.0**	**41,894**	**16.2**	**258,206**	**100.0**
Income Categories	**Housing Units by Tract**	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	35,341	9,448	5	26.7	23,257	65.8	2,636	7.5
Moderate-income	103,496	36,916	19.5	35.7	60,074	58	6,506	6.3
Middle-income	103,919	51,398	27.1	49.5	45,858	44.1	6,663	6.4
Upper-income	136,357	92,026	48.5	67.5	34,358	25.2	9,973	7.3
Tract not reported	511	0	0	0	366	71.6	145	28.4
Total AA	**379,624**	**189,788**	**100.0**	**50.0**	**163,913**	**43.2**	**25,923**	**6.8**
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	2,979	8	2,724	7.9	233	9.5	22	11.2

Moderate-income	8,566	23.1	7,819	22.7	700	28.4	47	23.9
Middle-income	10,508	28.3	9,712	28.2	740	30.1	56	28.4
Upper-income	14,754	39.7	13,940	40.4	746	30.3	68	34.5
Tract not reported	314	0.8	268	0.8	42	1.7	4	2
Total AA	**37,121**	**100.0**	**34,463**	**100.0**	**2,461**	**100.0**	**197**	**100.0**
Percentage of Total Businesses		**92.8**		**6.6**		**0.5**		

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 BOC'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 2023.

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. BOC operated 17 branches in the area and held $1.8 million in total deposits, representing 1.42 percent of the deposit market share.

The following exhibit 22 presents key demographic and business information concerning the assessment area.

EXHIBIT 22 ASSESSMENT AREA DEMOGRAPHICS ASSESSMENT AREA: SAN DIEGO								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	46	6.2	43,837	5.8	10,530	24	172,988	22.8
Moderate-income	167	22.7	173,346	22.8	20,063	11.6	131,098	17.3
Middle-income	262	35.5	260,157	34.3	15,032	5.8	142,293	18.7
Upper-income	248	33.6	279,925	36.9	9,275	3.3	313,039	41.2
Tract not reported	14	1.9	2,153	0.3	144	6.7	0	0
Total AA	**737**	**100**	**759,418**	**100**	**55,044**	**7.2**	**759,418**	**100**
Income Categories	**Housing Units by Tract**	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	69,718	14,897	2.4	21.4	51,057	73.2	3,764	5.4
Moderate-income	279,122	96,116	15.8	34.4	164,465	58.9	18,541	6.6
Middle-income	437,896	226,716	37.2	51.8	180,673	41.3	30,507	7
Upper-income	423,636	270,251	44.4	63.8	121,644	28.7	31,741	7.5
Tract not reported	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**
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	6,933	4	6,430	4	472	4.1	31	3.4

Moderate-income	30,515	17.5	28,537	17.6	1,869	16.3	109	11.9
Middle-income	60,606	34.7	56,389	34.7	3,915	34.2	302	32.9
Upper-income	75,277	43.1	69,736	43	5,073	44.3	468	50.9
Tract not reported	1,356	0.8	1,218	0.8	129	1.1	9	1
Total AA	**174,687**	**100.0**	**162,310**	**100.0**	**11,458**	**100.0**	**919**	**100.0**
Percentage of Total Businesses		**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 BOC's deposits, loans, investments, and branches may be found in the Core Tables.

San Luis Obispo Assessment Area

The San Luis Obispo assessment area consists of San Luis Obispo County in its entirety and comprises of the San Luis Obispo-Paso Robles MSA. San Luis Obispo County is located on the coast of southern California, South of Monterey County, and North of Santa Barbara County. The area was home to more than an estimated 281,639 people in 2023.

There were 15 FDIC-insured financial institutions operating 57 offices that held deposits totaling $8.6 billion in the area as of June 30, 2024. BOC operated three branches in the area and held $293 million in total deposits, representing 3.41 percent of the deposit market share.

The following exhibit23 presents key demographic and business information concerning the assessment area.

EXHIBIT 23 ASSESSMENT AREA DEMOGRAPHICS ASSESSMENT AREA: SAN LUIS OBISPO								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	13,684	20.4
Moderate-income	8	11.4	7,333	10.9	457	6.2	11,779	17.5
Middle-income	43	61.4	44,544	66.3	2,530	5.7	15,116	22.5
Upper-income	12	17.1	13,780	20.5	398	2.9	26,608	39.6
Tract not reported	7	10	1,530	2.3	164	10.7	0	0
Total AA	**70**	**100.0**	**67,187**	**100.0**	**3,549**	**5.3**	**67,187**	**100.0**
Income Categories	**Housing Units by Tract**	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	13,550	7,016	10.5	51.8	4,866	35.9	1,668	12.3
Middle-income	81,775	44,426	66.7	54.3	26,089	31.9	11,260	13.8
Upper-income	22,303	14,285	21.4	64	5,368	24.1	2,650	11.9
Tract not reported	4,628	908	1.4	19.6	3,286	71	434	9.4
Total AA	**122,256**	**66,635**	**100.0**	**54.5**	**39,609**	**32.4**	**16,012**	**13.1**
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	0	0	0	0	0	0	0	0

Moderate-income	2,274	13.2	2,122	13.2	141	14.2	11	14.1
Middle-income	10,596	61.6	10,016	62.1	535	54	45	57.7
Upper-income	4,013	23.3	3,700	22.9	293	29.6	20	25.6
Tract not reported	309	1.8	286	1.8	21	2.1	2	2.6
Total AA	**17,192**	**100.0**	**16,124**	**100.0**	**990**	**100.0**	**78**	**100.0**
Percentage of Total Businesses		**93.8**			**5.8**		**0.5**	

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 BOC's deposits, loans, investments, and branches may be found in the Core Tables.

Santa Barbara Assessment Area

The Santa Barbara assessment area consists of Santa Barbara County in its entirety. The assessment area is located on the coast of southern California, South of San Luis Obispo County and west of Ventura County. The area was home to more than an estimated 441,257 people in 2023.

There were 18 FDIC-insured financial institutions operating 88 offices that held deposits totaling $14.4 billion in the area as of June 30, 2024. BOC operated four branches in the area and held $363.6 million in total deposits, representing 2.52 percent of the deposit market share.

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

EXHIBIT 24
ASSESSMENT AREA DEMOGRAPHICS
ASSESSMENT AREA: SANTA BARBARA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	7	6.4	4,486	4.6	869	19.4	21,467	22
Moderate-income	28	25.7	25,189	25.9	3,162	12.6	17,654	18.1
Middle-income	30	27.5	32,178	33	1,628	5.1	17,892	18.4
Upper-income	38	34.9	35,513	36.5	1,292	3.6	40,384	41.5
Tract not reported	6	5.5	31	0	0	0	0	0
Total AA	**109**	**100.0**	**97,397**	**100.0**	**6,951**	**7.1**	**97,397**	**100.0**

Income Categories	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	9,342	1,020	1.3	10.9	7,820	83.7	502	5.4
Moderate-income	39,189	12,906	16.7	32.9	24,324	62.1	1,959	5
Middle-income	49,210	27,871	36	56.6	18,174	36.9	3,165	6.4
Upper-income	61,424	35,707	46.1	58.1	20,405	33.2	5,312	8.6
Tract not reported	152	0	0	0	82	53.9	70	46.1
Total AA	**159,317**	**77,504**	**100.0**	**48.6**	**70,805**	**44.4**	**11,008**	**6.9**

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	712	3.2	670	3.3	37	2.3	5	4.3

Moderate-income	4,264	19.2	3,900	19.1	340	20.9	24	20.5
Middle-income	6,311	28.4	5,838	28.5	445	27.3	28	23.9
Upper-income	10,806	48.7	9,967	48.7	779	47.8	60	51.3
Tract not reported	113	0.5	84	0.4	29	1.8	0	0
Total AA	**22,206**	**100.0**	**20,459**	**100.0**	**1,630**	**100.0**	**117**	**100.0**
Percentage of Total Businesses		**92.1**		**7.3**			**0.5**	

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 BOC's deposits, loans, investments, and branches may be found in the Core Tables.

Tulare Assessment Area

The Tulare assessment area consists of Tulare County in its entirety. Tulare County is located North of Kern County, South of Fresno County, to the East of Kings County and the west of Inyo County. The area was home to more than an estimated 479,468 people in 2023.

There were 13 FDIC-insured financial institutions operating 47 offices that held deposits totaling $7.1 billion in the area as of June 30, 2024. BOC operated one branch in the area and held $88.6 million in total deposits, representing 1.26 percent of the deposit market share.

The following exhibit 25 presents key demographic and business information concerning the assessment area.

EXHIBIT 25 ASSESSMENT AREA DEMOGRAPHICS ASSESSMENT AREA: TULARE								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	2	1.9	1,627	1.5	697	42.8	24,760	22.9
Moderate-income	34	33	34,587	31.9	9,732	28.1	18,584	17.2
Middle-income	35	34	36,382	33.6	6,593	18.1	18,771	17.3
Upper-income	31	30.1	35,732	33	2,929	8.2	46,213	42.7
Tract not reported	1	1	0	0	0	0	0	0
Total AA	**103**	**100.0**	**108,328**	**100.0**	**19,951**	**18.4**	**108,328**	**100.0**
Income Categories	**Housing Units by Tract**	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	2,730	652	0.8	23.9	1,919	70.3	159	5.8
Moderate-income	46,080	19,911	25.1	43.2	23,849	51.8	2,320	5
Middle-income	50,710	26,677	33.6	52.6	19,257	38	4,776	9.4
Upper-income	50,559	32,113	40.5	63.5	14,666	29	3,780	7.5
Tract not reported	0	0	0	0	0	0	0	0
Total AA	**150,079**	**79,353**	**100.0**	**52.9**	**59,691**	**39.8**	**11,035**	**7.4**
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	322	2.7	303	2.8	18	2.1	1	1.8

Moderate-income	3,177	27	2,896	26.7	267	30.5	14	25
Middle-income	3,777	32.1	3,470	32	290	33.1	17	30.4
Upper-income	4,502	38.2	4,178	38.5	300	34.3	24	42.9
Tract not reported	1	0	1	0	0	0	0	0
Total AA	**11,779**	**100.0**	**10,848**	**100.0**	**875**	**100.0**	**56**	**100.0**
Percentage of Total Businesses		**92.1**		**7.4**		**0.5**		

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 BOC's deposits, loans, investments, and branches may be found in the Core Tables.

APPENDIX D

CRA CORE TABLES

STATE OF CALIFORNIA

TABLE 1 - LENDING VOLUME											
Lending Test Evaluation Period: January 1, 2020 to December 31, 2023											
Community Development Loans Evaluation Period: January 26, 2021 to April 14, 2025											
Assessment Areas	% of Rated Area Loans	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans		Total Reported Loans		% of Rated Area Deposits
		#	$ (000's)	#	$ (000's)	#	$ (000's)	#	$ (000's)	#	$ (000's)	
Full Scope												
Los Angeles	69	988	$166,437	4	$209	0	0	399	$1,966,967	1391	$2,133,613	71
Limited Scope												
Kern	1	59	$3,462	0	0	0	0	24	$192,784	83	$196,246	1
Kings-Fresno	2	93	$5,884	9	$600	0	0	11	$128,372	113	$134,856	1
San Diego	14	213	$34,584	2	$110	0	0	61	$260,934	276	$295,628	6
San Luis Obispo	6	174	$13,971	0	0	0	0	17	$120,427	191	$134,398	1
Santa Barbara	3	108	$6,203	2	$110	0	0	19	$175,100	129	$181,413	1
Tulare	1	39	$2,154	2	$110	0	0	8	$75,971	49	$78,235	1

TABLE 2 - QUALIFIED INVESTMENTS									
Evaluation Period: January 26, 2021 to April 14, 2025									
Assessment Areas	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments		
	#	$ (000's)	#	$ (000's)	#	$ (000's)	% of Total	#	$ (000's)
Full Scope									
Los-Angeles	54	$150,229	42	$214,763	96	$364,992	42%	0	0
Limited Scope									
Kern	3	$1,033	2	$10,180	5	$11,213	2%	0	0
Kings-Fresno	6	$12,237	1	$5,100	7	$17,337	1%	0	0
San Diego	23	$33,712	6	$67,428	29	$101,140	13%	0	0
San Luis Obispo	3	$2,019	2	$11,000	5	$13,019	2%	0	0
Santa Barbara	7	$5,206	1	$10,000	8	$15,206	2%	0	0
Tulare	1	$539	1	$1,000	2	$1,539	1%	0	0

	Deposits	Branches						Branch Openings / Closings						Population			
TABLE 3 - DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Evaluation Period: January 1, 2020 to December 31, 2023																	
Assessment Areas	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Households within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope																	
Los Angeles	71%	50	66%	1.4%	18.1%	40.3%	38.9%	5	22	0	-1	-8	-7	4.6%	25.8%	32.5%	36.0%
																	Limited Scope
Kern	1%	1	1%	0%	0%	0%	100.0%	0	0	0	0	0	0	8.0%	27.0%	30.7%	33.2%
Kings-Fresno	1%	2	3%	0%	50%	0%	50%	0	1	0	0	0	-1	9.2%	27.4%	27.5%	35.7%
San Diego	6%	14	18%	0%	22.2%	33.3%	44.4%	1	4	0	-1	0	-3	5.8%	23.0%	36.0%	43.1%
San Luis Obispo	1%	3	4%	0%	25.0%	75.0%	0%	0	1	0	0	-1	0	0%	11.2%	66.4%	18.5%
Santa Barbara	1%	3	4%	0%	0%	50%	50%	0	1	0	0	0	-1	6.0%	25.1%	31.0%	37.8%
Tulare	1%	1	1%	0%	100.0%	0%	0%	0	0	0	0	0	0	1.8%	31.5%	33.0%	33.6%

	Table 4 – Geographic Distribution of Small loans to Business 2020 - 2021												
	Assessment Area: Los Angeles												
	Bank And Aggregate Loans By Year												**Total Businesses %**
Geographic Income Level	**2020**						**2021**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	121	3.1	4.9	25,644	3.8	5.3	125	3.6	4.5	24,283	4.3	5.4	4.9
Moderate	803	20.5	20.2	158,713	23.4	21.4	774	22.1	20.4	132,772	23.8	21.7	20.8
Middle	1,325	33.7	27.4	244,445	36.1	29.5	1,077	30.8	27.5	173,528	31.1	29.0	27.9
Upper	1,589	40.5	45.8	228,113	33.7	41.1	1,457	41.6	45.9	216,123	38.7	41.6	44.9
Unknown	88	2.2	1.4	20,283	3.0	2.3	68	1.9	1.2	11,823	2.1	2.2	1.4
Tract-Unk	0	0.0	0.4	0	0.0	0.4	0	0.0	0.5	0	0.0	0.1	
Total	3,926	100.0	100.0	677,198	100.0	100.0	3,501	100.0	100.0	558,529	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.

	Table 5 – Geographic Distribution of Small loans to Business 2022 - 2023											
	Assessment Area: Los Angeles											
	Bank And Aggregate Loans By Year											**Total Businesses %**
Geographic Income Level	**2022**						**2023**					
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	40	3.0	3.0	7,467	3.2	3.6	21	2.1	3.0	4,370	2.6	3.2	3.4
Moderate	277	20.7	20.0	48,675	20.9	21.5	186	18.8	19.7	37,547	22.6	20.7	20.3
Middle	419	31.3	30.8	69,457	29.8	30.8	320	32.4	30.8	50,015	30.1	30.9	30.6
Upper	557	41.6	44.1	97,753	41.9	41.1	425	43.0	44.5	69,243	41.6	42.4	43.8
Unknown	47	3.5	1.8	10,079	4.3	2.8	36	3.6	1.7	5,262	3.2	2.8	2.0
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
Total	1,340	100.0	100.0	233,431	100.0	100.0	988	100.0	100.0	166,437	100.0	100.0	100.0

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.

Table 6 – Borrower Distribution of Small loans to Businesses 2020 and 2021												
Assessment Area: Los Angeles												
	Bank And Aggregate Loans By Year											Total Businesses %
	2020						2021					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue												
$1 Million or Less	754	19.2	41.0	56,268	8.3	23.7	1,094	31.2	45.4	74,790	13.4	23.6	92.1
Over $1 Million	600	15.3		203,809	30.1		842	24.1		262,373	47.0		7.4
Revenue Unknown	2,572	65.5		417,121	61.6		1,565	44.7		221,367	39.6		0.5
Total	3,926	100.0		677,198	100.0		3,501	100.0		558,529	100.0		100.0
By Loan Size												
$100,000 or Less	2,302	58.6	90.1	95,279	14.1	38.0	2,194	62.7	93.8	88,205	15.8	41.4	
$100,001 - $250,000	809	20.6	5.9	142,392	21.0	19.6	663	18.9	3.6	114,250	20.5	17.3	
$250,001 - $1 Million	815	20.8	4.0	439,527	64.9	42.5	644	18.4	2.6	356,074	63.8	41.3	
Total	3,926	100.0	100.0	677,198	100.0	100.0	3,501	100.0	100.0	558,529	100.0	100.0	
By Loan Size and Revenues $1 Million or Less												
$100,000 or Less	670	88.9		26,391	46.9		972	88.8		36,850	49.3		
$100,001 - $250,000	56	7.4		11,281	20.0		84	7.7		15,000	20.1		
$250,001 - $1 Million	28	3.7		18,596	33.0		38	3.5		22,940	30.7		
Total	754	100.0		56,268	100.0		1,094	100.0		74,790	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.												

Table 7 – Borrower Distribution of Small loans to Businesses 2022 and 2023												
Assessment Area: Los Angeles												
	Bank And Aggregate Loans By Year											Total Businesses %
	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue												
$1 Million or Less	767	57.2	52.1	60,307	25.8	32.2	534	54.0	54.1	38,327	23.0	32.9	92.3
Over $1 Million	534	39.9		163,825	70.2		414	41.9		119,214	71.6		7.1
Revenue Unknown	39	2.9		9,299	4.0		40	4.0		8,896	5.3		0.6
Total	1,340	100.0		233,431	100.0		988	100.0		166,437	100.0		100.0
By Loan Size												
$100,000 or Less	866	64.6	96.2	39,032	16.7	50.9	703	71.2	96.5	30,157	18.1	53.8	
$100,001 - $250,000	232	17.3	2.3	41,999	18.0	14.2	100	10.1	2.1	21,324	12.8	14.1	
$250,001 - $1 Million	242	18.1	1.6	152,400	65.3	34.8	185	18.7	1.4	114,956	69.1	32.1	
Total	1,340	100.0	100.0	233,431	100.0	100.0	988	100.0	100.0	166,437	100.0	100.0	
By Loan Size and Revenues $1 Million or Less												
$100,000 or Less	652	85.0		27,885	46.2		481	90.1		19,343	50.5		
$100,001 - $250,000	92	12.0		15,844	26.3		32	6.0		6,636	17.3		
$250,001 - $1 Million	23	3.0		16,578	27.5		21	3.9		12,348	32.2		
Total	767	100.0		60,307	100.0		534	100.0		38,327	100.0		
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.												

Table 8 – Geographic Distribution of Small loans to Business 2020 - 2021												
Assessment Area: Kern

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	2.2	4.6	24	0.5	4.5	2	2.9	4.2	24	0.7	4.2	5.9
Moderate	16	17.8	17.9	746	15.3	18.7	11	15.9	17.1	279	8.5	17.6	20.1
Middle	17	18.9	24.2	787	16.2	21.7	10	14.5	25.1	495	15.1	23.3	26.5
Upper	55	61.1	51.7	3,309	68.0	52.6	46	66.7	51.8	2,471	75.6	52.6	46.9
Unknown	0	0.0	0.8	0	0.0	1.6	0	0.0	0.9	0	0.0	2.0	0.6
Tract-Unk	0	0.0	0.9	0	0.0	0.9	0	0.0	0.9	0	0.0	0.2	
Total	90	100.0	100.0	4,866	100.0	100.0	69	100.0	100.0	3,269	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.

	Table 9 – Geographic Distribution of Small loans to Business 2022 - 2023												
	Assessment Area: Kern												
	Bank And Aggregate Loans By Year												**Total Businesses %**
Geographic Income Level	**2022**						**2023**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	2	3.2	4.1	24	0.7	4.3	2	3.4	4.1	24	0.7	3.7	5.7
Moderate	6	9.5	17.7	249	6.9	16.5	7	11.9	18.2	358	10.3	18.0	20.2
Middle	9	14.3	28.8	419	11.6	27.6	8	13.6	28.3	317	9.2	25.3	27.2
Upper	42	66.7	44.7	2,805	77.5	45.7	38	64.4	45.3	2,640	76.3	47.6	40.8
Unknown	4	6.3	4.1	123	3.4	5.5	4	6.8	3.6	123	3.6	5.3	6.1
Tract-Unk	0	0.0	0.7	0	0.0	0.4	0	0.0	0.5	0	0.0	0.1	
Total	63	100.0	100.0	3,620	100.0	100.0	59	100.0	100.0	3,462	100.0	100.0	100.0
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.													

Table 10 – Borrower Distribution of Small loans to Businesses 2020 and 2021 Assessment Area: Kern												
	Bank And Aggregate Loans By Year											Total Businesses %
	2020					2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue												
$1 Million or Less	44	48.9	33.6	1,728	35.5	22.8	43	62.3	40.8	1,725	52.8	22.3	92.8
Over $1 Million	20	22.2		1,374	28.2		15	21.7		943	28.8		6.7
Revenue Unknown	26	28.9		1,764	36.3		11	15.9		601	18.4		0.5
Total	90	100.0		4,866	100.0		69	100.0		3,269	100.0		100.0
By Loan Size												
$100,000 or Less	83	92.2	88.2	3,307	68.0	37.0	65	94.2	92.5	2,470	75.6	38.6	
$100,001 - $250,000	6	6.7	7.8	1,268	26.1	24.9	4	5.8	4.8	799	24.4	22.6	
$250,001 - $1 Million	1	1.1	4.0	291	6.0	38.1	0	0.0	2.7	0	0.0	38.8	
Total	90	100.0	100.0	4,866	100.0	100.0	69	100.0	100.0	3,269	100.0	100.0	
By Loan Size and Revenues $1 Million or Less												
$100,000 or Less	43	97.7		1,478	85.5		42	97.7		1,475	85.5		
$100,001 - $250,000	1	2.3		250	14.5		1	2.3		250	14.5		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	44	100.0		1,728	100.0		43	100.0		1,725	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.

													Total Businesses %
Table 11 – Borrower Distribution of Small loans to Businesses 2022 and 2023													
Assessment Area: Kern													
	Bank And Aggregate Loans By Year												
	2022						2023						Total Businesses %
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	44	69.8	48.0	1,977	54.6	29.1	35	59.3	51.2	1,875	54.2	27.9	93.1
Over $1 Million	19	30.2		1,643	45.4		24	40.7		1,587	45.8		6.5
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.5
Total	63	100.0		3,620	100.0		59	100.0		3,462	100.0		100.0
By Loan Size													
$100,000 or Less	59	93.7	94.3	2,570	71.0	44.0	55	93.2	95.0	2,328	67.2	46.2	
$100,001 - $250,000	3	4.8	3.6	634	17.5	19.9	3	5.1	3.2	634	18.3	18.4	
$250,001 - $1 Million	1	1.6	2.1	416	11.5	36.1	1	1.7	1.8	500	14.4	35.4	
Total	63	100.0	100.0	3,620	100.0	100.0	59	100.0	100.0	3,462	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	42	95.5		1,593	80.6		33	94.3		1,125	60.0		
$100,001 - $250,000	2	4.5		384	19.4		1	2.9		250	13.3		
$250,001 - $1 Million	0	0.0		0	0.0		1	2.9		500	26.7		
Total	44	100.0		1,977	100.0		35	100.0		1,875	100.0		

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.

Table 12 – Geographic Distribution of Small loans to Business 2020 - 2021												
Assessment Area: Kings-Fresno												

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	9	5.0	4.5	406	3.2	4.5	5	3.5	4.4	195	1.8	4.2	5.9
Moderate	58	32.0	24.6	3,178	24.9	29.7	37	26.1	22.1	2,205	20.9	27.2	27.8
Middle	35	19.3	22.1	2,797	21.9	21.5	35	24.6	23.7	2,890	27.4	24.2	21.7
Upper	76	42.0	47.1	6,257	48.9	42.7	63	44.4	48.2	5,166	48.9	43.3	43.5
Unknown	3	1.7	1.1	150	1.2	1.0	2	1.4	0.9	110	1.0	0.9	1.1
Tract-Unk	0	0.0	0.6	0	0.0	0.6	0	0.0	0.7	0	0.0	0.3	
Total	181	100.0	100.0	12,788	100.0	100.0	142	100.0	100.0	10,566	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.

Table 13 – Geographic Distribution of Small loans to Business 2022 - 2023												
Assessment Area: Kings-Fresno												
	Bank And Aggregate Loans By Year											Total Businesses %
Geographic Income Level	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	9	8.6	6.0	465	6.0	6.8	8	8.6	5.9	434	7.4	5.6	8.0
Moderate	23	21.9	21.2	1,996	25.8	24.1	28	30.1	21.0	1,551	26.4	24.4	23.1
Middle	21	20.0	26.7	2,263	29.3	27.6	15	16.1	26.1	1,420	24.1	28.2	28.3
Upper	52	49.5	44.7	3,011	38.9	40.6	42	45.2	46.1	2,479	42.1	40.8	39.7
Unknown	0	0.0	0.7	0	0.0	0.7	0	0.0	0.6	0	0.0	0.8	0.8
Tract-Unk	0	0.0	0.6	0	0.0	0.3	0	0.0	0.4	0	0.0	0.1	
Total	105	100.0	100.0	7,735	100.0	100.0	93	100.0	100.0	5,884	100.0	100.0	100.0

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.

Table 14 – Borrower Distribution of Small loans to Businesses 2020 and 2021 Assessment Area: Kings-Fresno												
	Bank And Aggregate Loans By Year											Total Businesses %
	2020						2021					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue												
$1 Million or Less	99	54.7	32.3	4,436	34.7	20.6	79	55.6	40.8	3,960	37.5	23.2	92.4
Over $1 Million	41	22.7		4,359	34.1		43	30.3		4,775	45.2		7.1
Revenue Unknown	41	22.7		3,993	31.2		20	14.1		1,831	17.3		0.5
Total	181	100.0		12,788	100.0		142	100.0		10,566	100.0		100.0
By Loan Size												
$100,000 or Less	158	87.3	86.7	6,621	51.8	35.2	126	88.7	92.2	5,428	51.4	39.3	
$100,001 - $250,000	17	9.4	8.8	3,101	24.2	24.8	11	7.7	4.9	2,126	20.1	20.7	
$250,001 - $1 Million	6	3.3	4.6	3,066	24.0	40.0	5	3.5	3.0	3,012	28.5	39.9	
Total	181	100.0	100.0	12,788	100.0	100.0	142	100.0	100.0	10,566	100.0	100.0	
By Loan Size and Revenues $1 Million or Less												
$100,000 or Less	97	98.0		3,936	88.7		75	94.9		3,053	77.1		
$100,001 - $250,000	2	2.0		500	11.3		4	5.1		907	22.9		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	99	100.0		4,436	100.0		79	100.0		3,960	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.

Table 15 – Borrower Distribution of Small loans to Businesses 2022 and 2023 Assessment Area: Kings-Fresno												
	Bank And Aggregate Loans By Year											Total Businesses %
	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	67	63.8	48.4	3,567	46.1	30.3	63	67.7	50.5	3,126	53.1	29.8	92.8
Over $1 Million	37	35.2		4,068	52.6		30	32.3		2,758	46.9		6.6
Revenue Unknown	1	1.0		100	1.3		0	0.0		0	0.0		0.5
Total	105	100.0		7,735	100.0		93	100.0		5,884	100.0		100.0
By Loan Size													
$100,000 or Less	96	91.4	93.9	4,427	57.2	43.0	86	92.5	94.8	3,761	63.9	46.7	
$100,001 - $250,000	6	5.7	3.9	1,387	17.9	20.0	5	5.4	3.2	1,123	19.1	18.0	
$250,001 - $1 Million	3	2.9	2.2	1,921	24.8	37.0	2	2.2	1.9	1,000	17.0	35.3	
Total	105	100.0	100.0	7,735	100.0	100.0	93	100.0	100.0	5,884	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	65	97.0		2,896	81.2		61	96.8		2,626	84.0		
$100,001 - $250,000	1	1.5		250	7.0		2	3.2		500	16.0		
$250,001 - $1 Million	1	1.5		421	11.8		0	0.0		0	0.0		
Total	67	100.0		3,567	100.0		63	100.0		3,126	100.0		
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.*													

	Table 16 – Geographic Distribution of Small loans to Business 2020 - 2021												
	Assessment Area: San Diego												
Geographic Income Level	Bank And Aggregate Loans By Year												**Total Businesses %**
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	36	5.3	5.1	5,665	5.3	5.2	25	4.0	5.2	4,134	4.9	5.2	5.7
Moderate	86	12.6	14.0	10,798	10.1	13.4	91	14.5	14.2	13,057	15.4	13.8	15.7
Middle	280	41.1	34.6	38,825	36.1	37.1	254	40.5	34.4	31,780	37.5	36.1	35.2
Upper	277	40.7	45.6	52,019	48.4	43.6	256	40.8	45.5	35,725	42.1	44.6	43.4
Unknown	2	0.3	0.1	120	0.1	0.2	1	0.2	0.1	95	0.1	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	681	100.0	100.0	107,427	100.0	100.0	627	100.0	100.0	84,791	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.

	Bank And Aggregate Loans By Year												Total Businesses %
Table 17 – Geographic Distribution of Small loans to Business 2022 - 2023 **Assessment Area: San Diego**													
Geographic Income Level	**2022**						**2023**						**Total Businesses %**
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Low	6	2.4	3.4	2,604	6.2	3.9	3	1.4	3.4	1,133	3.3	3.3	4.0
Moderate	28	11.2	16.7	3,695	8.8	16.3	30	14.1	16.1	4,723	13.7	15.6	17.5
Middle	118	47.2	34.0	14,722	35.0	33.5	93	43.7	33.8	11,718	33.9	34.7	34.7
Upper	98	39.2	44.7	20,999	50.0	45.2	87	40.8	45.6	17,010	49.2	45.3	43.1
Unknown	0	0.0	0.7	0	0.0	1.0	0	0.0	0.6	0	0.0	1.0	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	250	100.0	100.0	42,020	100.0	100.0	213	100.0	100.0	34,584	100.0	100.0	100.0

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.

													Total Businesses %
	spanning: **Table 18 – Borrower Distribution of Small loans to Businesses 2020 and 2021**												

Table 18 – Borrower Distribution of Small loans to Businesses 2020 and 2021
Assessment Area: San Diego

	Bank And Aggregate Loans By Year												Total Businesses %
	2020						**2021**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	155	22.8	41.2	10,054	9.4	24.7	204	32.5	46.5	16,820	19.8	25.2	92.8
Over $1 Million	116	17.0		34,417	32.0		179	28.5		41,579	49.0		6.7
Revenue Unknown	410	60.2		62,956	58.6		244	38.9		26,392	31.1		0.5
Total	681	100.0		107,427	100.0		627	100.0		84,791	100.0		100.0
By Loan Size													
$100,000 or Less	423	62.1	89.6	17,174	16.0	37.6	424	67.6	93.4	15,829	18.7	39.7	
$100,001 - $250,000	134	19.7	6.4	22,595	21.0	20.7	105	16.7	3.8	17,965	21.2	17.9	
$250,001 - $1 Million	124	18.2	4.1	67,658	63.0	41.7	98	15.6	2.8	50,997	60.1	42.3	
Total	681	100.0	100.0	107,427	100.0	100.0	627	100.0	100.0	84,791	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	136	87.7		4,597	45.7		177	86.8		6,225	37.0		
$100,001 - $250,000	12	7.7		2,223	22.1		11	5.4		2,129	12.7		
$250,001 - $1 Million	7	4.5		3,234	32.2		16	7.8		8,466	50.3		
Total	155	100.0		10,054	100.0		204	100.0		16,820	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.

Table 19 – Borrower Distribution of Small loans to Businesses 2022 and 2023 Assessment Area: San Diego												
	Bank And Aggregate Loans By Year											Total Businesses %
	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue												
$1 Million or Less	119	47.6	52.2	13,569	32.3	31.3	89	41.8	54.7	7,021	20.3	31.5	92.9
Over $1 Million	127	50.8		28,359	67.5		110	51.6		24,892	72.0		6.6
Revenue Unknown	4	1.6		92	0.2		14	6.6		2,671	7.7		0.5
Total	250	100.0		42,020	100.0		213	100.0		34,584	100.0		100.0
By Loan Size												
$100,000 or Less	173	69.2	95.9	6,273	14.9	49.6	147	69.0	96.2	4,977	14.4	51.6	
$100,001 - $250,000	28	11.2	2.4	5,684	13.5	15.2	26	12.2	2.2	5,467	15.8	14.6	
$250,001 - $1 Million	49	19.6	1.7	30,063	71.5	35.2	40	18.8	1.6	24,140	69.8	33.8	
Total	250	100.0	100.0	42,020	100.0	100.0	213	100.0	100.0	34,584	100.0	100.0	
By Loan Size and Revenues $1 Million or Less												
$100,000 or Less	98	82.4		3,526	26.0		77	86.5		2,577	36.7		
$100,001 - $250,000	9	7.6		1,929	14.2		6	6.7		1,154	16.4		
$250,001 - $1 Million	12	10.1		8,114	59.8		6	6.7		3,290	46.9		
Total	119	100.0		13,569	100.0		89	100.0		7,021	100.0		

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.

	Table 20 – Geographic Distribution of Small loans to Business 2020 - 2021												
	Assessment Area: San Luis Obispo												
Geographic Income Level	**Bank And Aggregate Loans By Year**												**Total Businesses %**
	2020						**2021**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	92	25.6	19.7	5,087	15.2	18.7	70	25.5	18.5	4,602	15.4	18.8	21.1
Middle	182	50.7	58.3	17,885	53.5	55.4	148	54.0	59.3	18,150	60.6	57.4	59.6
Upper	85	23.7	20.6	10,447	31.3	24.5	56	20.4	19.9	7,222	24.1	22.8	18.7
Unknown	0	0.0	0.3	0	0.0	0.6	0	0.0	0.5	0	0.0	0.7	0.6
Tract-Unk	0	0.0	1.0	0	0.0	0.8	0	0.0	1.7	0	0.0	0.3	
Total	359	100.0	100.0	33,419	100.0	100.0	274	100.0	100.0	29,974	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.

Table 21 – Geographic Distribution of Small loans to Business 2022 - 2023 Assessment Area: San Luis Obispo												
Geographic Income Level	**Bank And Aggregate Loans By Year**											**Total Businesses %**
	2022						**2023**					
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	27	13.7	13.1	1,645	9.0	13.2	18	10.3	12.8	1,264	9.0	13.6	13.2
Middle	109	55.3	61.6	8,352	45.7	55.0	102	58.6	59.9	6,514	46.6	52.1	61.6
Upper	56	28.4	22.7	8,067	44.1	30.2	50	28.7	24.7	5,973	42.8	32.4	23.3
Unknown	5	2.5	1.4	230	1.3	1.1	4	2.3	1.4	220	1.6	1.5	1.8
Tract-Unk	0	0.0	1.3	0	0.0	0.5	0	0.0	1.2	0	0.0	0.4	
Total	197	100.0	100.0	18,294	100.0	100.0	174	100.0	100.0	13,971	100.0	100.0	100.0

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.

Table 22 – Borrower Distribution of Small loans to Businesses 2020 and 2021												
Assessment Area: San Luis Obispo												
	Bank And Aggregate Loans By Year											**Total Businesses %**
	2020						**2021**					
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
By Revenue													
$1 Million or Less	161	44.8	32.3	8,763	26.2	19.2	152	55.5	42.0	10,492	35.0	21.6	93.7
Over $1 Million	35	9.7		7,188	21.5		46	16.8		9,502	31.7		5.8
Revenue Unknown	163	45.4		17,468	52.3		76	27.7		9,980	33.3		0.5
Total	359	100.0		33,419	100.0		274	100.0		29,974	100.0		100.0
By Loan Size													
$100,000 or Less	292	81.3	88.1	11,157	33.4	34.4	218	79.6	92.2	8,416	28.1	36.6	
$100,001 - $250,000	41	11.4	6.8	7,190	21.5	20.0	30	10.9	4.4	5,527	18.4	18.4	
$250,001 - $1 Million	26	7.2	5.1	15,072	45.1	45.6	26	9.5	3.4	16,031	53.5	45.0	
Total	359	100.0	100.0	33,419	100.0	100.0	274	100.0	100.0	29,974	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	152	94.4		5,647	64.4		140	92.1		5,567	53.1		
$100,001 - $250,000	6	3.7		1,372	15.7		6	3.9		1,374	13.1		
$250,001 - $1 Million	3	1.9		1,744	19.9		6	3.9		3,551	33.8		
Total	161	100.0		8,763	100.0		152	100.0		10,492	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.													

	Table 23 – Borrower Distribution of Small loans to Businesses 2022 and 2023												Total Businesses %
	Assessment Area: San Luis Obispo												
	Bank And Aggregate Loans By Year												
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	145	73.6	53.4	9,996	54.6	33.3	123	70.7	56.0	6,405	45.8	32.9	93.8
Over $1 Million	49	24.9		7,398	40.4		46	26.4		6,651	47.6		5.8
Revenue Unknown	3	1.5		900	4.9		5	2.9		915	6.5		0.5
Total	197	100.0		18,294	100.0		174	100.0		13,971	100.0		100.0
By Loan Size													
$100,000 or Less	162	82.2	95.1	6,636	36.3	43.3	148	85.1	95.2	6,096	43.6	47.4	
$100,001 - $250,000	21	10.7	2.6	4,518	24.7	15.0	17	9.8	2.7	3,563	25.5	15.7	
$250,001 - $1 Million	14	7.1	2.3	7,140	39.0	41.7	9	5.2	2.2	4,312	30.9	37.0	
Total	197	100.0	100.0	18,294	100.0	100.0	174	100.0	100.0	13,971	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	134	92.4		5,322	53.2		116	94.3		4,729	73.8		
$100,001 - $250,000	6	4.1		1,404	14.0		5	4.1		1,054	16.5		
$250,001 - $1 Million	5	3.4		3,270	32.7		2	1.6		622	9.7		
Total	145	100.0		9,996	100.0		123	100.0		6,405	100.0		

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.

Table 24 – Geographic Distribution of Small loans to Business 2020 - 2021												
Assessment Area: Santa Barbara												
Geographic Income Level	Bank And Aggregate Loans By Year											Total Businesses %
	2020					2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	23	9.2	3.7	5,026	19.7	3.7	20	10.0	3.7	4,678	22.9	3.8	5.1
Moderate	51	20.5	30.8	3,870	15.2	36.6	52	26.0	29.3	5,602	27.5	35.6	30.2
Middle	106	42.6	24.9	11,020	43.3	26.8	78	39.0	25.2	7,295	35.8	26.6	25.5
Upper	67	26.9	39.2	5,461	21.4	31.3	50	25.0	40.1	2,816	13.8	33.0	38.7
Unknown	2	0.8	0.6	97	0.4	0.9	0	0.0	0.4	0	0.0	0.7	0.5
Tract-Unk	0	0.0	0.9	0	0.0	0.8	0	0.0	1.2	0	0.0	0.2	
Total	249	100.0	100.0	25,474	100.0	100.0	200	100.0	100.0	20,391	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.

Table 25 – Geographic Distribution of Small loans to Business 2022 - 2023												
Assessment Area: Santa Barbara												
Geographic Income Level	Bank And Aggregate Loans By Year											Total Businesses %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	9	7.3	2.3	1,255	12.3	1.8	8	7.4	2.4	781	12.6	2.9	3.2
Moderate	23	18.7	18.5	3,661	36.0	19.6	15	13.9	18.8	1,118	18.0	20.1	19.2
Middle	44	35.8	28.6	2,642	25.9	26.0	38	35.2	28.2	1,670	26.9	25.7	28.4
Upper	45	36.6	49.0	2,528	24.8	51.6	45	41.7	49.2	2,537	40.9	50.4	48.7
Unknown	2	1.6	0.5	97	1.0	0.5	2	1.9	0.4	97	1.6	0.6	0.5
Tract-Unk	0	0.0	1.2	0	0.0	0.4	0	0.0	0.9	0	0.0	0.3	
Total	123	100.0	100.0	10,183	100.0	100.0	108	100.0	100.0	6,203	100.0	100.0	100.0

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.

Table 26 – Borrower Distribution of Small loans to Businesses 2020 and 2021												
Assessment Area: Santa Barbara												
	Bank And Aggregate Loans By Year											Total Businesses %
	2020					2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue												
$1 Million or Less	121	48.6	32.5	5,981	23.5	20.9	106	53.0	44.0	4,111	20.2	26.8	92.0
Over $1 Million	37	14.9		6,160	24.2		50	25.0		9,945	48.8		7.5
Revenue Unknown	91	36.5		13,333	52.3		44	22.0		6,335	31.1		0.5
Total	249	100.0		25,474	100.0		200	100.0		20,391	100.0		100.0
By Loan Size												
$100,000 or Less	191	76.7	87.7	7,106	27.9	33.9	155	77.5	91.7	5,222	25.6	35.7	
$100,001 - $250,000	33	13.3	7.3	6,019	23.6	21.0	27	13.5	4.9	4,857	23.8	19.8	
$250,001 - $1 Million	25	10.0	5.0	12,349	48.5	45.2	18	9.0	3.4	10,312	50.6	44.5	
Total	249	100.0	100.0	25,474	100.0	100.0	200	100.0	100.0	20,391	100.0	100.0	
By Loan Size and Revenues $1 Million or Less												
$100,000 or Less	114	94.2		4,089	68.4		102	96.2		3,181	77.4		
$100,001 - $250,000	4	3.3		793	13.3		3	2.8		643	15.6		
$250,001 - $1 Million	3	2.5		1,099	18.4		1	0.9		287	7.0		
Total	121	100.0		5,981	100.0		106	100.0		4,111	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.												

Table 27 – Borrower Distribution of Small loans to Businesses 2022 and 2023 Assessment Area: Santa Barbara												
	Bank And Aggregate Loans By Year											Total Businesses %
	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	85	69.1	50.2	4,732	46.5	33.5	64	59.3	53.0	2,545	41.0	32.4	92.1
Over $1 Million	36	29.3		5,151	50.6		43	39.8		3,599	58.0		7.3
Revenue Unknown	2	1.6		300	2.9		1	0.9		59	1.0		0.5
Total	123	100.0		10,183	100.0		108	100.0		6,203	100.0		100.0
By Loan Size													
$100,000 or Less	108	87.8	94.8	4,312	42.3	44.2	101	93.5	95.5	4,059	65.4	50.3	
$100,001 - $250,000	7	5.7	3.0	1,468	14.4	16.6	5	4.6	2.8	1,068	17.2	16.8	
$250,001 - $1 Million	8	6.5	2.3	4,403	43.2	39.2	2	1.9	1.7	1,076	17.3	32.9	
Total	123	100.0	100.0	10,183	100.0	100.0	108	100.0	100.0	6,203	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	80	94.1		2,976	62.9		63	98.4		2,352	92.4		
$100,001 - $250,000	2	2.4		443	9.4		1	1.6		193	7.6		
$250,001 - $1 Million	3	3.5		1,313	27.7		0	0.0		0	0.0		
Total	85	100.0		4,732	100.0		64	100.0		2,545	100.0		
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.													

Table 28 – Geographic Distribution of Small loans to Business 2020 - 2021												
Assessment Area: Tulare												
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.9	0	0.0	0.9	0	0.0	0.9	0	0.0	0.4	1.1
Moderate	12	32.4	28.6	899	36.8	35.6	10	32.3	26.6	807	37.6	31.0	29.9
Middle	13	35.1	28.8	627	25.7	25.8	11	35.5	29.3	520	24.2	27.0	29.9
Upper	12	32.4	40.9	917	37.5	36.7	10	32.3	42.1	821	38.2	41.4	39.2
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	0.9	0	0.0	0.9	0	0.0	1.1	0	0.0	0.3	
Total	37	100.0	100.0	2,443	100.0	100.0	31	100.0	100.0	2,148	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.

Table 29 – Geographic Distribution of Small loans to Business 2022 - 2023												
Assessment Area: Tulare												
	Bank And Aggregate Loans By Year												Total Businesses %
Geographic Income Level	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	1.8	0	0.0	2.0	0	0.0	1.9	0	0.0	1.5	2.7
Moderate	8	21.6	24.5	555	28.2	26.7	7	17.9	24.8	255	11.8	26.2	27.0
Middle	17	45.9	31.8	1,022	52.0	32.2	20	51.3	30.7	1,491	69.2	34.0	32.1
Upper	12	32.4	41.1	390	19.8	38.6	12	30.8	41.8	408	18.9	37.8	38.2
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	0.8	0	0.0	0.4	0	0.0	0.8	0	0.0	0.6	
Total	37	100.0	100.0	1,967	100.0	100.0	39	100.0	100.0	2,154	100.0	100.0	100.0

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.

Table 30 – Borrower Distribution of Small loans to Businesses 2020 and 2021 Assessment Area: Tulare												
	Bank And Aggregate Loans By Year											Total Businesses %
	2020					2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue												
$1 Million or Less	26	70.3	31.0	943	38.6	18.9	24	77.4	46.0	875	40.7	24.5	91.8
Over $1 Million	6	16.2		492	20.1		4	12.9		582	27.1		7.7
Revenue Unknown	5	13.5		1,008	41.3		3	9.7		691	32.2		0.5
Total	37	100.0		2,443	100.0		31	100.0		2,148	100.0		100.0
By Loan Size												
$100,000 or Less	31	83.8	86.8	1,053	43.1	32.8	26	83.9	92.6	775	36.1	37.9	
$100,001 - $250,000	5	13.5	8.1	872	35.7	23.3	3	9.7	4.4	555	25.8	20.3	
$250,001 - $1 Million	1	2.7	5.1	518	21.2	43.9	2	6.5	3.0	818	38.1	41.8	
Total	37	100.0	100.0	2,443	100.0	100.0	31	100.0	100.0	2,148	100.0	100.0	
By Loan Size and Revenues $1 Million or Less												
$100,000 or Less	25	96.2		771	81.8		23	95.8		703	80.3		
$100,001 - $250,000	1	3.8		172	18.2		1	4.2		172	19.7		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	26	100.0		943	100.0		24	100.0		875	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.

Table 31 – Borrower Distribution of Small loans to Businesses 2022 and 2023													
Assessment Area: Tulare													
	Bank And Aggregate Loans By Year												**Total Businesses %**
	2022						**2023**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
By Revenue													
$1 Million or Less	30	81.1	55.1	903	45.9	30.5	34	87.2	58.3	1,173	54.5	31.3	92.1
Over $1 Million	7	18.9		1,064	54.1		5	12.8		981	45.5		7.4
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.5
Total	37	100.0		1,967	100.0		39	100.0		2,154	100.0		100.0
By Loan Size													
$100,000 or Less	33	89.2	94.9	945	48.0	42.0	35	89.7	95.7	1,033	48.0	46.6	
$100,001 - $250,000	2	5.4	3.0	422	21.5	17.9	2	5.1	2.6	422	19.6	17.4	
$250,001 - $1 Million	2	5.4	2.1	600	30.5	40.1	2	5.1	1.6	699	32.5	36.0	
Total	37	100.0	100.0	1,967	100.0	100.0	39	100.0	100.0	2,154	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	30	100.0		903	100.0		33	97.1		1,001	85.3		
$100,001 - $250,000	0	0.0		0	0.0		1	2.9		172	14.7		
$250,001 - $1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	30	100.0		903	100.0		34	100.0		1,173	100.0		

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.

TABLE 32 - LENDING VOLUME Lending Test Evaluation Period: January 1, 2020 to December 31, 2023 Community Development Loans Evaluation Period: January 26, 2021 to April 14, 2025												
Assessment Areas	**% of Rated Area Loans**	**Small Business Loans**		**Small Farm Loans**		**All HMDA Loans**		**Community Development Loans**		**Total Reported Loans**		**% of Rated Area Deposits**
		#	**$ (000's)**	**#**	**$ (000's)**	**#**	**$ (000's)**	**#**	**$ (000's)**	**#**	**$ (000's)**	
Full Scope												
Denver-Arapahoe	2	40	$5,237	0	0	0	0	9	$149,183	49	$154,420	1

TABLE 33 - QUALIFIED INVESTMENTS Evaluation Period: January 26, 2021 to April 14, 2025									
Assessment Areas	**Prior Period Investments**		**Current Period Investments**		**Total Investments**			**Unfunded Commitments**	
	#	**$ (000's)**	**#**	**$ (000's)**	**#**	**$ (000's)**	**% of Total**	**#**	**$ (000's)**
Full Scope									
Denver-Arapahoe	5	$14,366	2	$39,069	7	$53,435	8%	0	0

TABLE 34- DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Evaluation Period: January 1, 2020 to December 31, 2023																		
Assessment Areas	**Deposits**	**Branches**						**Branch Openings / Closings**						**Population**			
	% of Rated Area Deposits in AA	**# of Bank Branches**	**% of Rated Area Branches in AA**	**Location of Branches by Income Level of Geography (%)**				**# of Branch Openings**	**# of Branch Closings**	**Net Change in Location of Branches (+ or -)**				**% of Households within each Geography**			
				Low	**Mod**	**Mid**	**Upp**			**Low**	**Mod**	**Mid**	**Upp**	**Low**	**Mod**	**Mid**	**Upp**
Full Scope																	
Denver-Arapahoe	1%	1	1%	0	0	0	100%	0	0	0	0	0	0	5.7%	31.2%	32.5%	28.3%

Table 35 – Geographic Distribution of Small loans to Business 2020 - 2021												
Assessment Area: Denver-Arapahoe												
Geographic Income Level	**Bank And Aggregate Loans By Year**											**Total Businesses %**
	2020						**2021**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Low	4	8.9	10.0	1,883	14.5	12.3	5	29.4	10.3	2,260	38.0	12.9	9.4
Moderate	8	17.8	19.1	1,489	11.5	18.4	4	23.5	19.7	1,180	19.8	18.3	19.4
Middle	9	20.0	30.7	2,015	15.5	30.2	5	29.4	31.0	684	11.5	30.6	31.4
Upper	22	48.9	39.3	6,564	50.6	37.4	2	11.8	38.1	1,078	18.1	36.9	39.3
Unknown	2	4.4	0.7	1,016	7.8	1.5	1	5.9	0.6	750	12.6	1.3	0.6
Tract-Unk	0	0.0	0.2	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
Total	45	100.0	100.0	12,967	100.0	100.0	17	100.0	100.0	5,952	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.

| Table 36 – Geographic Distribution of Small loans to Business 2022 - 2023 |||||||||||||
| Assessment Area: Denver-Arapahoe |||||||||||||

	Bank And Aggregate Loans By Year											Total Businesses %
Geographic Income Level	**2022**						**2023**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	9	36.0	4.9	1,380	32.1	6.0	2	5.0	4.8	1,005	19.2	5.3	4.2
Moderate	6	24.0	23.0	1,142	26.5	20.3	14	35.0	22.6	1,534	29.3	21.1	22.3
Middle	5	20.0	29.5	571	13.3	26.9	11	27.5	30.0	585	11.2	25.3	30.1
Upper	4	16.0	37.1	460	10.7	37.7	12	30.0	37.4	1,363	26.0	39.8	38.1
Unknown	1	4.0	5.4	750	17.4	8.9	1	2.5	5.0	750	14.3	8.4	5.4
Tract-Unk	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	
Total	25	100.0	100.0	4,303	100.0	100.0	40	100.0	100.0	5,237	100.0	100.0	100.0

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.

Table 37 – Borrower Distribution of Small loans to Businesses 2020 and 2021												
Assessment Area: Denver-Arapahoe												
	Bank And Aggregate Loans By Year											**Total Businesses %**
	2020						**2021**					
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
By Revenue													
$1 Million or Less	2	4.4	40.6	705	5.4	22.3	4	23.5	46.7	1,540	25.9	25.6	91.6
Over $1 Million	5	11.1		2,170	16.7		5	29.4		2,058	34.6		7.3
Revenue Unknown	38	84.4		10,092	77.8		8	47.1		2,354	39.5		1.0
Total	45	100.0		12,967	100.0		17	100.0		5,952	100.0		100.0
By Loan Size													
$100,000 or Less	15	33.3	86.7	644	5.0	30.6	7	41.2	91.2	274	4.6	32.1	
$100,001 - $250,000	11	24.4	7.4	1,982	15.3	20.0	2	11.8	4.7	321	5.4	18.0	
$250,001 - $1 Million	19	42.2	5.9	10,341	79.7	49.4	8	47.1	4.1	5,357	90.0	49.9	
Total	45	100.0	100.0	12,967	100.0	100.0	17	100.0	100.0	5,952	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	0	0.0		0	0.0		2	50.0		100	6.5		
$100,001 - $250,000	1	50.0		220	31.2		0	0.0		0	0.0		
$250,001 - $1 Million	1	50.0		485	68.8		2	50.0		1,440	93.5		
Total	2	100.0		705	100.0		4	100.0		1,540	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.													

	Table 38 – Borrower Distribution of Small loans to Businesses 2022 and 2023												
	Assessment Area: Denver-Arapahoe												
	Bank And Aggregate Loans By Year												Total Businesses %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	15	60.0	53.4	1,063	24.7	34.9	32	80.0	55.9	2,527	48.3	32.6	91.9
Over $1 Million	10	40.0		3,240	75.3		7	17.5		2,225	42.5		7.1
Revenue Unknown	0	0.0		0	0.0		1	2.5		485	9.3		1.0
Total	25	100.0		4,303	100.0		40	100.0		5,237	100.0		100.0
By Loan Size													
$100,000 or Less	19	76.0	94.9	799	18.6	39.8	34	85.0	94.9	1,752	33.5	41.7	
$100,001 - $250,000	1	4.0	2.4	240	5.6	12.3	1	2.5	2.6	150	2.9	13.8	
$250,001 - $1 Million	5	20.0	2.7	3,264	75.9	47.9	5	12.5	2.5	3,335	63.7	44.6	
Total	25	100.0	100.0	4,303	100.0	100.0	40	100.0	100.0	5,237	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	14	93.3		763	71.8		30	93.8		1,627	64.4		
$100,001 - $250,000	0	0.0		0	0.0		1	3.1		150	5.9		
$250,001 - $1 Million	1	6.7		300	28.2		1	3.1		750	29.7		
Total	15	100.0		1,063	100.0		32	100.0		2,527	100.0		
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.													

TABLE 39 - LENDING VOLUME Lending Test Evaluation Period: January 1, 2020 to December 31, 2023 Community Development Loans Evaluation Period: January 26, 2021 to April 14, 2025												
Assessment Areas	% of Rated Area Loans	Small Business Loans		Small Farm Loans		All HMDA Loans		Community Development Loans		Total Reported Loans		% of Rated Area Deposits
		#	$ (000's)	#	$ (000's)	#	$ (000's)	#	$ (000's)	#	$ (000's)	
Full Scope												
Durham-Wake	1	39	$2,927	0	0	0	0	6	$87,977	45	$90,904	18

TABLE 40 - QUALIFIED INVESTMENTS Evaluation Period: January 26, 2021 to April 14, 2025									
Assessment Areas	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	$ (000's)	#	$ (000's)	#	$ (000's)	% of Total	#	$ (000's)
Full Scope									
Durham-Wake	20	$21,426	6	$20,948	26	$42,374	4%	0	0

TABLE 41 - DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Evaluation Period: January 8, 2019 to December 31, 2020																		
Assessment Areas	Deposits	Branches						Branch Openings / Closings						Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income Level of Geography (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Households within each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope																	
Durham-Wake	18%	1	1%	0%	100%	0%	0%	0	1	0	-1	0	0	7.9%	17.9%	35.7%	37.1%

Table 42 – Geographic Distribution of Small loans to Business 2020 - 2021 Assessment Area: Durham-Wake												
Geographic Income Level	**Bank And Aggregate Loans By Year**											**Total Businesses %**
	2020						**2021**					
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	5	10.0	4.8	475	6.7	5.5	3	9.1	4.7	300	12.3	6.0	5.1
Moderate	9	18.0	19.1	402	5.7	19.1	10	30.3	19.8	588	24.2	19.3	20.5
Middle	9	18.0	30.9	2,544	36.0	32.8	4	12.1	31.6	416	17.1	31.9	31.2
Upper	25	50.0	44.3	3,411	48.3	41.3	14	42.4	43.1	979	40.2	42.1	42.5
Unknown	2	4.0	0.4	229	3.2	0.9	2	6.1	0.3	150	6.2	0.7	0.6
Tract-Unk	0	0.0	0.4	0	0.0	0.4	0	0.0	0.5	0	0.0	0.1	
Total	50	100.0	100.0	7,061	100.0	100.0	33	100.0	100.0	2,433	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.

Table 43 – Geographic Distribution of Small loans to Business 2022 - 2023												
Assessment Area: Durham-Wake												
Geographic Income Level	Bank And Aggregate Loans By Year											**Total Businesses %**
	2022					2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	4	12.1	5.4	400	14.3	6.7	5	12.8	5.1	500	17.1	6.2	5.8
Moderate	5	15.2	16.7	748	26.8	14.2	3	7.7	16.0	128	4.4	14.2	16.0
Middle	9	27.3	34.7	563	20.2	35.5	10	25.6	35.2	490	16.7	36.1	35.6
Upper	15	45.5	41.3	1,078	38.7	41.6	20	51.3	41.8	1,684	57.5	41.9	41.1
Unknown	0	0.0	1.6	0	0.0	2.0	1	2.6	1.7	125	4.3	1.5	1.5
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	
Total	33	100.0	100.0	2,789	100.0	100.0	39	100.0	100.0	2,927	100.0	100.0	100.0

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.

Table 44 – Borrower Distribution of Small loans to Businesses 2020 and 2021												
Assessment Area: Durham-Wake												
	Bank And Aggregate Loans By Year											Total Businesses %
	2020					2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue												
$1 Million or Less	23	46.0	42.4	1,264	17.9	28.4	18	54.5	46.6	982	40.4	31.5	92.8
Over $1 Million	9	18.0		1,979	28.0		8	24.2		1,002	41.2		6.3
Revenue Unknown	18	36.0		3,818	54.1		7	21.2		449	18.5		0.9
Total	50	100.0		7,061	100.0		33	100.0		2,433	100.0		100.0
By Loan Size												
$100,000 or Less	37	74.0	86.7	2,121	30.0	31.7	29	87.9	91.4	1,669	68.6	33.8	
$100,001 - $250,000	7	14.0	7.6	1,282	18.2	20.9	4	12.1	4.7	764	31.4	18.6	
$250,001 - $1 Million	6	12.0	5.6	3,658	51.8	47.4	0	0.0	3.9	0	0.0	47.5	
Total	50	100.0	100.0	7,061	100.0	100.0	33	100.0	100.0	2,433	100.0	100.0	
By Loan Size and Revenues $1 Million or Less												
$100,000 or Less	23	100.0		1,264	100.0		18	100.0		982	100.0		
$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		0	0.0		0	0.0		
Total	23	100.0		1,264	100.0		18	100.0		982	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.

	Table 45 – Borrower Distribution of Small loans to Businesses 2022 and 2023												
	Assessment Area: Durham-Wake												
	Bank And Aggregate Loans By Year												Total Businesses %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	24	72.7	51.3	1,260	45.2	35.3	30	76.9	53.8	1,714	58.6	35.0	92.8
Over $1 Million	9	27.3		1,529	54.8		6	15.4		868	29.7		6.3
Revenue Unknown	0	0.0		0	0.0		3	7.7		345	11.8		1.0
Total	33	100.0		2,789	100.0		39	100.0		2,927	100.0		100.0
By Loan Size													
$100,000 or Less	30	90.9	94.3	1,739	62.4	40.9	35	89.7	94.7	2,103	71.8	42.9	
$100,001 - $250,000	2	6.1	2.9	500	17.9	14.7	4	10.3	2.8	824	28.2	14.9	
$250,001 - $1 Million	1	3.0	2.8	550	19.7	44.4	0	0.0	2.5	0	0.0	42.3	
Total	33	100.0	100.0	2,789	100.0	100.0	39	100.0	100.0	2,927	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	24	100.0		1,260	100.0		30	100.0		1,714	100.0		
$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		0	0.0		0	0.0		
Total	24	100.0		1,260	100.0		30	100.0		1,714	100.0		
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.													