



## PUBLIC DISCLOSURE

December 2, 2019

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community West Bank, National Association  
Charter Number 21699

445 Pine Avenue  
Goleta, CA 93117

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

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**Institution's CRA Rating: This institution is rated Outstanding.**

**The Lending Test is rated: Outstanding.**

**The Community Development test is rated: Satisfactory.**

The overall performance of Community West Bank, National Association is Outstanding. The major factors that support this rating include:

- The Lending Test rating is based on the bank's record of performance in meeting the credit needs of its assessment areas during the evaluation period through its lending activities.
  - The bank's loan-to-deposit (LTD) ratio is more than reasonable, given the bank's size, financial condition, and business strategy.
  - The bank originated a majority of its loans within its assessment areas.
  - The geographic distribution of loans reflects excellent distribution throughout the bank's Assessment Areas (AAs).
  - Lending activities represent excellent distribution to individuals of different income levels and businesses of different sizes.
- The Community Development Test rating is based on the aggregate assessment of the bank's community development activities for loans, investments, and services in the bank's assessment areas.
  - The bank's community development activities demonstrate an adequate level of responsiveness based on available opportunities in the assessment areas during the evaluation period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio is more than reasonable.

We analyzed the bank's quarterly average LTD ratio for the 13 quarters since the previous CRA examination through December 31, 2018. CWB's average LTD ratio for this period was 103 percent, with a high of 106 percent and a low of 100 percent. For purposes of comparison, we selected three banks that CWB considers direct competitors for loans and deposits in its AAs. The combined average quarterly LTD ratio for these institutions over the same period was 92 percent. Their average quarterly LTD ratios ranged from a high of 100 percent to a low of 85 percent.

### Lending in Assessment Area

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

The bank originated and purchased a combined 63 percent of the number of loans and 62 percent of the dollar volume of loans inside the bank's three AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not

include extensions of credit by affiliates that may be considered under the other performance criteria. Lending Test conclusions are based upon loans originated and purchased inside the bank's AAs.

Lending Inside and Outside of the Assessment Areas 2016 - 2018										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	506	52.9	450	47.1	956	85,335	47.3	94,892	52.7	180,226
Small Business	339	86.3	54	13.7	493	105,191	83.4	20,877	16.6	126,068
<b>Total</b>	<b>845</b>	<b>62.6</b>	<b>504</b>	<b>37.4</b>	<b>1,349</b>	<b>190,526</b>	<b>62.2</b>	<b>115,769</b>	<b>37.8</b>	<b>306,294</b>

*Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0.*

## Description of Institution

Community West Bank, National Association (CWB or bank) is an intrastate full-service community bank headquartered in Goleta, California. The bank was chartered in August 1989 as Goleta National Bank. Community West Bancshares, a one-bank holding company, acquired the bank in 1997 and holds 100 percent ownership. In September 2004, Goleta National Bank's name was changed to Community West Bank, National Association. It has no affiliate relationships.

The bank operates eight full-service branches in the contiguous counties of San Luis Obispo, Santa Barbara, and Ventura Counties. These counties make up CWB's three AAs. During the evaluation period, the bank opened the Oxnard and Paso Robles branches and relocated the Santa Maria branch. The bank did not close any branch locations. CWB offers a variety of traditional banking products and services to both individual customers and businesses. Each branch has an automated teller machine (ATM) onsite. The bank does not offer drive-up teller access.

As of December 31, 2018, the bank reported total assets of \$868.7 million, total loans of \$759.7 million, total deposits of \$716.3 million, and total equity capital of \$72.4 million. Net loans represented 86 percent of total assets. The bank's primary strategy is the financing of manufactured housing within its three AAs and in communities located along the coast of California. The bank also offers loan products to meet the needs of business customers including commercial real estate, commercial construction, commercial and industrial, and Small Business Administration (SBA) lending.

There are no legal, financial, or other factors that impede the bank's ability to meet credit needs in its communities. CWB received a "Satisfactory" rating under the intermediate small bank CRA procedures at their December 5, 2016 CRA examination.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation (PE) assesses the Community Reinvestment Act (CRA) performance of Community West Bank, using Intermediate Small Bank CRA examination procedures. We performed a full-scope examination of the bank's three assessment areas. Refer to appendix A for detailed information.

Consistent with CWB's business strategy, we placed more weight on the bank's primary product of home mortgage loans for manufactured housing. The bank also originates loans to small businesses. This evaluation also included an assessment of the bank's community development (CD) lending, investments, and services activities. The evaluation period for the lending test is January 1, 2016 through December 31, 2018. The evaluation period for the community development test is December 1, 2016 through December 31, 2018.

Due to the Census data changing during the evaluation period, we compared 2010 Census data to loans originated from January 1, 2016 through December 31, 2016; and 2015 American Community Survey (ACS) Census data to loans originated from January 1, 2017 through December 31, 2018.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

CWB has three AAs. Equal weighting for the evaluation was placed on all three AAs.

The state rating is based on performance in all bank AAs. Refer to the "Scope" section under the state section for details regarding how the areas were weighted in arriving at the respective ratings.

### Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an

affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of California

**CRA rating for the State of California:** Outstanding

**The Lending Test is rated:** Outstanding

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution throughout the bank's AAs.
- Lending activities represent excellent distribution to individuals of different income levels and businesses of different sizes.
- CWB's aggregate level of responsiveness to CD needs is adequate.

### Description of Institution's Operations in California

#### San Luis Obispo County Assessment Area

Community West Bank designated San Luis Obispo (SLO) County as an AA in November 2016. The county makes up the San Luis Obispo-Paso Robles-Arroyo Grande MSA and includes 54 census tracts (CTs): 7 are moderate-income; 34 are middle-income; and 8 are upper-income. In addition, 5 CTs do not report data and are listed as unknown. The AA does not have any low-income CTs. The AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income (LMI) geographies.

The primary products in SLO are construction loans and manufactured home loans. The bank has two branches in the SLO AA, San Luis Obispo and Paso Robles. Both branches have ATMs on site. The San Luis Obispo branch is in an upper-income census tract and the Paso Robles is in a moderate-income census tract. Competition from other financial institutions is strong in the SLO AA. As of June 30, 2018, the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share report indicates the bank's deposits inside the AA are \$19.9 million and ranks 14th in deposit market share with 0.30 percent of the AA's deposits. A total of 14 financial institutions, with a combined 68 branches, competed for over \$6.5 billion of insured deposits in San Luis Obispo County. This includes three nationwide mega-banks with a combined 20 branches that account for 45 percent of the deposit market share, representing \$2.9 billion in deposits.

We reviewed a recent community contact previously made in the AA. Affordable housing and financial literacy education were identified as greatly needed in the AA. The AA is small but rural and has large CTs. According to the San Luis Obispo Chamber of Commerce, the key industries are Innovation Services, manufacturing, health services, construction, wine, and agriculture. The major employers in the AA include California Polytechnic State University, County of San Luis Obispo, Department of State Hospitals-Atascadero, Pacific Gas & Electric, and California Men's Colony (correctional facility).

The information in the following table provides SLO AA demographic information for 2018.

Table A - Demographic Information of the Assessment Area 2018						
Assessment Area: San Luis Obispo County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	54	0.0	13.0	63.0	14.8	9.3
Population by Geography	276,517	0.0	13.8	65.8	14.8	5.6
Housing Units by Geography	118,806	0.0	14.2	68.6	16.0	1.3
Owner-Occupied Units by Geography	59,714	0.0	9.3	71.7	18.5	0.5
Occupied Rental Units by Geography	43,862	0.0	21.6	63.4	12.6	2.4
Vacant Units by Geography	15,230	0.0	11.8	71.1	15.6	1.5
Businesses by Geography	24,466	0.0	20.8	58.7	19.6	0.8
Farms by Geography	1,192	0.0	10.1	71.7	16.7	1.5
Family Distribution by Income Level	65,508	21.0	18.2	20.2	40.6	0.0
Household Distribution by Income Level	103,576	24.8	15.9	16.8	42.5	0.0
Median Family Income MSA - 42020 San Luis Obispo-Paso Robles-Arroyo Grande, CA MSA		\$76,771	Median Housing Value			\$476,489
			Median Gross Rent			\$1,281
			Families Below Poverty Level			7.6%

*Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0.  
 (\*) The NA category consists of geographies that have not been assigned an income classification.*

### Santa Barbara County Assessment Area

Community West Bank has designated Santa Barbara (SB) County as an AA. The county makes up the Santa Maria-Santa Barbara MSA and includes 90 CTs: 8 are low-income; 23 are moderate-income; 23 are middle-income; and 32 are upper-income. In addition, 4 CTs do not report data and are listed as unknown. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

The primary product in the Santa Barbara AA is manufactured housing loans. Currently the bank has approved 277 manufactured housing parks in California, with 108 parks located in the bank’s AAs. The bank’s competitors do not offer manufactured housing loans.

The bank has three branches in the SB AA, Goleta, Santa Maria, and Santa Barbara with each having an ATM on site. The Goleta and Santa Barbara branches are in moderate-income CTs. The Santa Maria branch is in a middle-income CT and is adjacent to moderate- and low-income CTs. Competition from other financial institutions is strong in the SB AA. As of June 30, 2018, the FDIC Deposit Market Share report indicates the bank’s deposits inside the AA are \$568 million and ranks 7th in deposit market share with 4.46 percent of the AA’s deposits. A total of 19 financial institutions, with a combined 96 branches, competed for over \$12.7 billion of insured deposits in Santa Barbara County. This includes three nationwide mega-banks with a combined 31 branches that account for 42 percent of the deposit market share, representing \$5.3 billion in deposits.



We updated a previous community contact performed in the AA. The contact indicated the banks are meeting the needs of the community and they have worked with CWB on several projects. They stated more affordable housing is needed in the AA. According to the County of Santa Barbara the key industries are agriculture, tourism and wine, business support services, healthcare, building and design, technology and innovation, and energy and environment. The major employers in the AA include University of California - Santa Barbara, Vandenberg Air Force Base, County of Santa Barbara, Cottage Health System, Santa Barbara City College, Santa Barbara Unified School District, and Raytheon Electronic Systems.

The information in the following table provides SB AA demographic information for 2018.

<b>Table A - Demographic Information of the Assessment Area 2018</b>						
<b>Assessment Area: Santa Barbara County</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	90	8.9	25.6	25.6	35.6	4.4
Population by Geography	435,850	12.2	25.8	29.3	32.0	0.7
Housing Units by Geography	154,135	9.4	23.8	28.7	38.1	0.0
Owner-Occupied Units by Geography	74,083	3.1	15.6	34.1	47.2	0.0
Occupied Rental Units by Geography	68,630	16.6	32.6	24.1	26.7	0.1
Vacant Units by Geography	11,422	7.0	23.5	22.0	47.1	0.3
Businesses by Geography	31,730	5.5	29.3	25.6	39.1	0.5
Farms by Geography	1,235	4.3	17.6	24.0	53.9	0.2
Family Distribution by Income Level	93,473	23.4	16.8	18.2	41.6	0.0
Household Distribution by Income Level	142,713	25.2	15.7	16.9	42.2	0.0
Median Family Income MSA - 42200 Santa Maria-Santa Barbara, CA MSA		\$74,824	Median Housing Value			\$560,373
			Median Gross Rent			\$1,425
			Families Below Poverty Level			10.0%

*Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0.  
(\*) The NA category consists of geographies that have not been assigned an income classification.*

## Ventura County Assessment Area

Community West Bank has designated Ventura County as an AA. The county makes up the Oxnard-Thousand Oaks-Ventura MSA and includes 174 CTs: 9 are low-income; 50 are moderate-income; 61 are middle-income; and 51 are upper-income. In addition, 3 CTs do not report data and are listed as unknown. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

The primary product in the Ventura AA is construction and manufactured housing loans. With the Westlake Village Branch bordering Los Angeles County, the bank has been acquiring customers in the Malibu community applying for manufactured housing loans.

The bank has three branches in Ventura County, Oxnard, Ventura, and Westlake Village with each having an ATM on site. The Oxnard Branch is in a middle-income census tract adjacent to low- and moderate-income census tracts. The Ventura Branch is in a moderate-income

census tract and the Westlake Village Branch is in an upper-income census tract near moderate-income census tracts. Competition from other financial institutions is strong in the Ventura AA. As of June 30, 2018, the FDIC Deposit Market Share report indicates the bank’s deposits inside the AA are \$116 million and ranks 16th in deposit market share with 0.59 percent of the AA’s deposits. A total of 23 financial institutions, with a combined 164 branches, competed for over \$19.7 billion of insured deposits in Ventura Barbara County. This includes three nationwide mega-banks with a combined 80 branches that account for 66 percent of the deposit market share, representing \$13.1 billion in deposits.

We utilized a recent community contact performed in the AA. The contact indicated the AA has a need for affordable housing, community social services, and food banks. Additionally, the contact’s perception is that communities in the county rely more on community banks as large banks are not receptive to providing assistance. According to the Ventura Chamber of Commerce the key industries are agriculture, manufacturing, healthcare, retail, technology and innovation, travel, tourism, and hospitality. The major employers in the AA include the Naval Base at Point Mugu, Port of Hueneme, Ventura County, California State University Channel Islands, and California Lutheran University.

The information in the following table provides Ventura AA demographic information for 2018.

<b>Table A - Demographic Information of the Assessment Area 2018</b>						
<b>Assessment Area: Ventura County</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	174	5.2	28.7	35.1	29.3	1.7
Population by Geography	840,833	4.4	29.2	37.7	28.5	0.2
Housing Units by Geography	283,899	3.4	25.9	39.9	30.4	0.4
Owner-Occupied Units by Geography	172,609	1.4	19.2	40.6	38.7	0.1
Occupied Rental Units by Geography	96,360	7.0	37.1	38.2	17.0	0.7
Vacant Units by Geography	14,930	3.4	31.7	42.5	21.1	1.3
Businesses by Geography	60,251	5.4	19.8	39.8	34.4	0.5
Farms by Geography	1,709	4.9	23.5	43.5	27.7	0.5
Family Distribution by Income Level	198,047	22.2	17.1	19.9	40.8	0.0
Household Distribution by Income Level	268,969	23.6	16.3	18.5	41.6	0.0
Median Family Income MSA - 37100 Oxnard-Thousand Oaks-Ventura, CA MSA		\$86,766	Median Housing Value			\$476,341
			Median Gross Rent			\$1,535
			Families Below Poverty Level			7.9%

Source: 2015 ACS Census and 2018 D&B Data. Due to rounding, totals may not equal 100.0.  
 (\*) The NA category consists of geographies that have not been assigned an income classification.

## Scope of Evaluation in California

The CRA evaluation determines the bank's record of meeting community credit needs. The OCC used a combination of bank and examiner generated loan and/or demographic reports to assess the bank's CRA performance. The evaluation period for the lending test is January 1, 2016 through December 31, 2018. In assessing the bank's distribution of home mortgage loans to LMI borrowers, examiners placed more weight on the bank's performance compared to the aggregate and less weight on performance compared to the demographics. This is due to the high cost of housing in the AAs, which impacted the availability of affordable homes for LMI borrowers and reduced the opportunities for home purchase lending for all lenders during the review period. In addition, examiners placed greater weight on the bank's performance compared to the aggregate in lending to small businesses as the demographics of the AAs indicate that a number of businesses with revenues less than or equal to \$1 million do not seek out lending opportunities. Examiners also placed greater weight on performance in 2017 and 2018 since this is based on ACS Census data that is more recent. A full-scope review was selected for all three of the banks AAs.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

### LENDING TEST

The bank's performance under the Lending Test in California is rated Outstanding.

Based on full-scope review of all three AAs, the bank's lending performance in the state of California is excellent.

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

Overall, the bank exhibits excellent geographic distribution of loans in the state.

#### *Home Mortgage Loans*

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

#### *San Luis Obispo Assessment Area*

Due to the census changes in 2015, there were no low-income CTs in the SLO AA for 2017-18. For 2016, the bank did not originate any loans in low-income CTs, reflecting very poor distribution. However, demographics show that there is only 0.3 percent of owner-occupied housing in the AA and aggregate peer data is 0.5 percent. For 2017-18 the bank originated 6.1 percent of loans in moderate-income CTs which was near to the demographic of 9.3 percent and aggregate of 10.6 percent, reflecting reasonable distribution. For 2016 the bank originated 10.5 percent of loans in moderate-income CTs, well above the demographic of 5.6 percent and aggregate of 6.8 percent, reflecting excellent distribution.

### *Santa Barbara Assessment Area*

For 2017-18 and 2016, the bank did not originate any loans in low-income CTs, reflecting very poor distribution in the SB AA. However, demographics show that there is only 2.8 percent of owner-occupied housing in the AA and aggregate peer data is 3.4 percent. For 2017-18 the bank originated 14.9 percent of loans in moderate-income CTs which was near to the demographic of 15.6 but lower than the aggregate of 19.5 percent, reflecting excellent distribution. For 2016 the bank originated 9.8 percent of loans in moderate-income CTs, lower than the demographic of 15.1 percent and aggregate of 17.7 percent, reflecting reasonable distribution.

### *Ventura Assessment Area*

For 2017-18 the bank originated 2.1 percent of loans in Ventura AA low-income CTs, well above the demographic of 1.4 percent and aggregate peer data of 1.2 percent, reflecting excellent distribution. For 2016, the bank did not originate any loans in low-income CTs, reflecting very poor distribution. However, demographics show that there is only 1.9 percent of owner-occupied housing in the AA and aggregate peer data is 2.0 percent. For 2017-18 the bank originated 27.8 percent of loans in moderate-income CTs, well above the demographic of 19.2 percent and aggregate of 19.9 percent, reflecting excellent distribution. For 2016 the bank originated 15.5 percent of loans in moderate-income CTs which was near to the demographic of 17.1 percent and slightly above the aggregate of 15.2 percent, reflecting excellent distribution.

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

Refer to Table Q in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

### *San Luis Obispo Assessment Area*

Due to the census changes in 2015, there were no low-income CTs in the SLO AA for 2017-18. For 2016, the bank did not originate any loans to businesses with revenues less than or equal to \$1.0 million in low-income CTs, reflecting very poor distribution. The demographic percentage of AA businesses in low-income CTs was 2.0 percent and the aggregate lending was 1.3 percent. For 2017 and 2018, the bank originated 18.8 percent of loans in moderate-income CTs, which was near to the demographic percentage of 20.8 percent and slightly above the aggregate lending of 18.2 percent, reflecting excellent distribution. For 2016, the bank originated 5.0 percent of loans in moderate-income CTs, which was lower than the demographic percentage of 10.6 percent and the aggregate lending of 8.6 percent, reflecting reasonable distribution.

### *Santa Barbara Assessment Area*

For 2017 and 2018, the bank originated 6.6 percent of loans to businesses with revenues less than or equal to \$1.0 million in low-income CTs, above the demographic percentage of 5.5

percent and the aggregate lending of 4.4, reflecting excellent distribution in the SB AA. For 2016, the bank originated 15.2 percent of loans in low-income CTs, above the demographic percentage of 13.3 percent and the aggregate lending of 9.5 percent, reflecting excellent distribution. For 2017 and 2018, the bank originated 26.2 percent of loans in moderate-income CTs, which was near to the demographic percentage of 29.3 percent and the aggregate lending of 29.8 percent, reflecting excellent distribution. For 2016, the bank originated 24.2 percent of loans in moderate-income CTs, well above the demographic percentage of 21.7 percent and the aggregate lending of 19.8 percent, reflecting excellent distribution.

### *Ventura Assessment Area*

For 2017 and 2018 the bank originated 7.0 percent of loans to businesses with revenues less than or equal to \$1.0 million in Ventura AA low-income CTs, above the demographic percentage of 5.4 percent and the aggregate lending of 5.4, reflecting excellent distribution. For 2016, the bank originated 3.2 percent of loans in low-income CTs, which was near to the demographic percentage of 3.5 percent and above the aggregate lending of 2.9 percent, reflecting excellent distribution. For 2017 and 2018, the bank originated 21.7 percent of loans in moderate-income CTs, above the demographic percentage of 19.8 percent and the aggregate lending of 18.7 percent, reflecting excellent distribution. For 2016, the bank originated 19.4 percent of loans in moderate-income CTs, above the demographic percentage of 18.8 percent and the aggregate lending of 16.0 percent, reflecting excellent distribution.

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

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

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

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

### *San Luis Obispo Assessment Area*

For 2017 and 2018, the bank did not originate any loans to low-income borrowers in the SLO AA, reflecting very poor distribution. The demographic percentage of low-income families was 21.0 percent and the aggregate peer data was 3.0 percent. The high cost of housing makes it very difficult for low-income families earning less than \$36,000 to purchase and own a home where the median home price is \$542,686. For 2016, the bank originated 5.3 percent of loans to low-income borrowers, less than the demographic percentage of 19.8 percent but well above the aggregate of 2.4 percent, reflecting reasonable distribution. For 2017 and 2018, the bank originated 18.4 percent of loans to moderate-income borrowers, above the demographic percentage of 18.2 percent and well above the aggregate of 7.9 percent, reflecting excellent distribution. For 2016, the bank originated 21.1 percent of loans to moderate-income borrowers, above the demographic percentage of 18.2 percent and well above the aggregate of 8.2 percent, reflecting excellent distribution.

### *Santa Barbara Assessment Area*

For 2017 and 2018, the bank originated 1.3 percent of loans to low-income borrowers, below the demographic percentage of low-income families of 23.4 percent and the aggregate peer data of 3.1 percent, reflecting reasonable distribution in the SB AA. The high cost of housing makes it very difficult for low-income families earning less than \$37,000 to purchase and own a home where the median home price is \$560,373. For 2016, the bank originated 6.1 percent of loans to low-income borrowers, less than the demographic percentage of 21.7 percent but well above the aggregate of 2.8 percent, reflecting excellent distribution. For 2017 and 2018, the bank originated 20.8 percent of loans to moderate-income borrowers, well above the demographic percentage of 16.8 percent and the aggregate of 9.9 percent, reflecting excellent distribution. For 2016, the bank originated 29.3 percent of loans to moderate-income borrowers, well above the demographic percentage of 17.8 percent and the aggregate of 10.6 percent, reflecting excellent distribution.

### *Ventura Assessment Area*

For 2017 and 2018 the bank originated 7.6 percent of loans in the Ventura AA to low-income borrowers, below the demographic percentage of low-income families of 22.2 percent and well above aggregate peer data of 4.3 percent, reflecting excellent distribution. The high cost of housing makes it very difficult for low-income families earning less than \$43,000 to purchase and own a home where the median home price is \$476,341. For 2016, the bank originated 13.8 percent of loans to low-income borrowers, less than the demographic percentage of 21.4 percent but well above the aggregate of 2.8 percent, reflecting excellent distribution. For 2017 and 2018, the bank originated 31.9 percent of loans to moderate-income borrowers, well above the demographic percentage of 17.1 percent and the aggregate of 11.5 percent, reflecting excellent distribution. For 2016, the bank originated 37.9 percent of loans to moderate-income borrowers, well above the demographic percentage of 17.4 percent and the aggregate of 10.7 percent, reflecting excellent distribution.

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

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

### *San Luis Obispo Assessment Area*

For 2017 and 2018, while the 54.2 percent of loans originated by the bank to businesses with revenues less than or equal to \$1 million is below the 87.4 percent of businesses in the SLO AA demographics, it is well above the aggregate peer data of 45.9 percent and reflects excellent distribution. The high AA demographic indicates that a number of businesses with revenues less than or equal to \$1 million do not seek out lending opportunities. For 2016, the bank originated 60.0 percent of loans, below the demographic percentage of 87.4 percent, but well above the aggregate of 38.1 percent, reflecting excellent distribution.

### *Santa Barbara Assessment Area*

For 2017 and 2018, while the 50.8 percent of loans originated by the bank to businesses with revenues less than or equal to \$1 million is below the 84.9 percent of businesses in the SB AA demographics, it is above the aggregate peer data of 47.4 percent and reflects excellent distribution. The high AA demographic indicates that a number of businesses with revenues less than or equal to \$1 million do not seek out lending opportunities. For 2016, the bank originated 51.5 percent of loans, below the demographic percentage of 84.7 percent, but well above the aggregate of 40.1 percent, reflecting excellent distribution.

### *Ventura Assessment Area*

For 2017 and 2018, the 40.9 percent of loans originated by the bank to businesses with revenues less than or equal to \$1 million is below the 86.2 percent of businesses in the Ventura AA demographics and near to the aggregate peer data of 49.3 percent and reflects reasonable distribution. The high AA demographic indicates that a number of businesses with revenues less than or equal to \$1 million do not seek out lending opportunities. For 2016, the bank originated 41.9 percent of loans, below the demographic percentage of 86.4 percent, but above the aggregate of 40.9 percent, reflecting excellent distribution.

### **Responses to Complaints**

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

## **COMMUNITY DEVELOPMENT TEST**

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

Based on full-scope reviews of the bank's three AAs, the bank exhibits adequate responsiveness to community development needs in the AAs through community development loans, qualified investments and donations, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

The bank's aggregate new CD loans, investments, and donations during the evaluation period totaled \$6.9 million. These activities adequately responded to identified community needs for LMI services, affordable housing, and small business loans. Most CD activities were provided in the Santa Barbara and Ventura AAs through CD loans, donations, and qualified service hours. In the new San Luis Obispo AA, the bank's largest CD activity was a new investment in response to the need for affordable housing.

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

Refer to the Lending Activity table for the facts and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

<b>Community Development Loans</b>				
<b>Assessment Area</b>	<b>Total</b>			
	<b>#</b>	<b>% of Total #</b>	<b>\$ (000's)</b>	<b>% of Total \$</b>
San Luis Obispo County	1	9.1	55	0.9
Santa Barbara County	3	27.3	2,450	40.3
Ventura County	7	63.6	3,578	58.8

The level of CD loans represents an adequate responsiveness to identified needs within the AAs. During the evaluation period, the bank made 11 CD loans which totaled \$6 million and were primarily in the Santa Barbara and Ventura AAs. Examples of CD loans include:

- Term real estate loan for a CD organization which provides food and other necessities for LMI
- Purchase of a medical office property for a CD organization which provides medical services for LMI
- Purchase of affordable housing for LMI
- SBA loans for economic development of businesses within the AAs

**Number and Amount of Qualified Investments**

<b>Qualified Investments and Donations</b>										
<b>Assessment Area</b>	<b>Prior Period *</b>		<b>Current Period</b>		<b>Total</b>				<b>Unfunded Commitments**</b>	
	<b>#</b>	<b>\$(000's)</b>	<b>#</b>	<b>\$(000's)</b>	<b>#</b>	<b>% of Total #</b>	<b>\$(000's)</b>	<b>% of Total \$</b>	<b>#</b>	<b>\$(000's)</b>
San Luis Obispo County	0	0	7	812	7	18.4	812	15.5	0	0
Santa Barbara County	5	1,037	8	46	13	34.2	1,083	20.6	0	0
Ventura County	7	3,322	11	29	18	47.4	3,351	63.9	0	0

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date. Investments which benefit multiple AAs are counted and separated for each AA.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

CWB demonstrated adequate responsiveness to CD investment opportunities. During the evaluation period, qualified investments and donations totaled \$5.2 million. These totals include \$4.3 million from prior period investments in the Santa Barbara and Ventura AAs. The bank made one current period investment of \$802 thousand in a mortgage backed security for LMI borrowers in the San Luis Obispo AA. In addition, the bank made 25 donations totaling \$85 thousand to 11 qualified CD organizations in the AAs. This included a \$25 thousand donation for revitalization and stabilization following the devastating Thomas Fire in the Santa Barbara and Ventura AAs. Other donations primarily supported organizations who provide services for LMI individuals or organizations which support small businesses.

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

The bank's level of CD services reflects an adequate responsiveness to identified needs within the AAs. CWB employees provided 201 hours to 11 qualified CD organizations during the evaluation period. Examples of CD services provided by bank staff include:



- Serving as Board members for several CD organizations, including a legal aid foundation, a nonprofit providing services for LMI, and an affordable housing corporation.
- Providing financial literacy education for LMI individuals.
- Facilitating two FHLB grants totaling \$10,000 for the Thomas Fire disaster relief.

The bank provided qualified service hours to organizations in all their AAs, including 15 hours in San Luis Obispo, 174 hours in Santa Barbara, and 13 hours in Ventura. To demonstrate their commitment to community service, the bank developed a program which allows employees to volunteer up to 16 hours per year during working hours.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	1/1/2016 to 12/31/2018	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>California</b>		
San Luis Obispo County	Full-scope	
Santa Barbara County	Full-scope	
Ventura County	Full-scope	

## Appendix B: Summary of MMSA and State Ratings

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RATINGS		Community West Bank	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Community West Bank	Outstanding	Satisfactory	Outstanding
MMSA or State:			
California	Outstanding	Satisfactory	Outstanding

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

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business,

or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

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

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

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

**Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

**Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

**Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.



Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing	% Bank Loans	Aggregate	% of Owner-Occupied Housing	% Bank Loans	Aggregate	% of Owner-Occupied Housing	% Bank Loans	Aggregate	% of Owner-Occupied Housing	% Bank Loans	Aggregate	% of Owner-Occupied Housing	% Bank Loans	Aggregate		
San Luis Obispo County	49	9,098	14.1	8,437	0.0	0.0	0.0	9.3	6.1	10.6	71.7	79.6	73.7	18.5	14.3	15.5	0.5	0.0	0.2		
Santa Barbara County	154	31,357	44.4	9,326	3.1	0.0	4.4	15.6	14.9	19.5	34.1	53.9	35.5	47.2	31.2	40.5	0.0	0.0	0.1		
Ventura County	144	20,448	41.5	22,975	1.4	2.1	1.2	19.2	27.8	19.9	40.6	46.5	39.5	38.7	23.6	39.1	0.1	0.0	0.2		
<b>Total</b>	347	60,903	100.0	40,738	1.5	0.9	1.7	16.4	19.0	17.9	45.1	54.5	45.7	36.8	25.6	34.5	0.2	0.0	0.2		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
San Luis Obispo County	19	2,885	12.0	12,838	0.3	0.0	0.5	5.6	10.5	6.8	66.3	47.4	68.0	27.8	42.1	24.6	0.0	0.0	0.0		
Santa Barbara County	82	14,509	51.6	13,960	2.8	0.0	3.4	15.1	9.8	17.7	34.9	64.6	35.4	47.1	25.6	43.5	0.0	0.0	0.0		
Ventura County	58	7,038	36.5	36,739	1.9	0.0	2.0	17.1	15.5	15.2	43.2	67.2	44.8	37.8	17.2	38.1	0.0	0.0	0.0		
<b>Total</b>	159	24,432	100.0	63,537	1.8	0.0	2.0	14.3	12.0	14.0	45.8	63.5	47.4	38.1	24.5	36.5	0.0	0.0	0.0		

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data; 2016 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
San Luis Obispo County	49	9,098	24.7	8,437	21.0	0.0	3.0	18.2	18.4	7.9	20.2	36.7	19.1	40.6	42.9	57.6	0.0	2.0	12.4		
Santa Barbara County	154	31,357	103.4	9,326	23.4	1.3	3.1	16.8	20.8	9.9	18.2	37.0	19.1	41.6	39.0	53.3	0.0	1.9	14.6		
Ventura County	144	20,448	72.7	22,975	22.2	7.6	4.3	17.1	31.9	11.5	19.9	39.6	23.0	40.8	18.1	47.3	0.0	2.8	13.8		
Total	347	60,903	175.3	40,738	22.3	3.7	3.8	17.2	25.1	10.4	19.5	38.0	21.3	41.0	30.8	50.8	0.0	2.3	13.7		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
San Luis Obispo County	19	2,885	12.0	12,838	19.8	5.3	2.4	18.2	21.1	8.2	21.6	47.4	20.8	40.4	21.1	55.5	0.0	5.3	13.1		
Santa Barbara County	82	14,509	51.6	13,960	21.7	6.1	2.8	17.8	29.3	10.6	18.6	30.5	19.2	41.9	31.7	51.6	0.0	2.4	15.8		
Ventura County	58	7,038	36.5	36,739	21.4	13.8	2.8	17.4	37.9	10.7	20.5	25.9	22.9	40.7	22.4	48.7	0.0	0.0	14.9		
Total	159	24,432	100.0	63,537	21.2	8.8	2.7	17.6	31.4	10.2	20.2	30.8	21.7	41.0	27.0	50.7	0.0	1.9	14.7		

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data; 2016 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
San Luis Obispo County	48	18,476	45.7	8,115	0.0	<b>0.0</b>	0.0	20.8	<b>18.8</b>	18.2	58.7	37.5	61.0	19.6	39.6	20.4	0.8	4.2	0.4		
Santa Barbara County	61	14,493	27.2	9,984	5.5	<b>6.6</b>	4.4	29.3	<b>26.2</b>	29.8	25.6	16.4	25.9	39.1	50.8	39.4	0.5	0.0	0.5		
Ventura County	115	34,294	51.3	22,773	5.4	<b>7.0</b>	5.4	19.8	<b>21.7</b>	18.7	39.8	55.7	39.6	34.4	12.2	35.7	0.5	3.5	0.5		
<b>Total</b>	<b>224</b>	<b>67,263</b>	<b>100.0</b>	<b>40,872</b>	<b>4.3</b>	<b>5.4</b>	<b>4.1</b>	<b>22.6</b>	<b>22.3</b>	<b>21.3</b>	<b>39.9</b>	<b>41.1</b>	<b>40.5</b>	<b>32.6</b>	<b>28.6</b>	<b>33.6</b>	<b>0.6</b>	<b>2.7</b>	<b>0.5</b>		

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
San Luis Obispo County	20	7,733	17.4	12,602	2.0	<b>0.0</b>	1.3	10.6	<b>5.0</b>	8.6	60.3	60.0	59.0	27.0	35.0	31.1	0.1	0.0	0.0		
Santa Barbara County	33	10,882	28.7	13,631	13.3	<b>15.2</b>	9.5	21.7	<b>24.2</b>	19.8	26.7	33.3	27.9	37.9	27.3	42.2	0.5	0.0	0.6		
Ventura County	62	19,313	53.9	32,805	3.5	<b>3.2</b>	2.9	18.8	<b>19.4</b>	16.0	44.4	72.6	41.8	33.4	4.8	39.4	0.0	0.0	0.0		
<b>Total</b>	<b>115</b>	<b>37,928</b>	<b>100.0</b>	<b>59,038</b>	<b>5.8</b>	<b>6.1</b>	<b>4.1</b>	<b>17.8</b>	<b>18.3</b>	<b>15.3</b>	<b>43.0</b>	<b>59.1</b>	<b>42.3</b>	<b>33.2</b>	<b>16.5</b>	<b>38.3</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>		

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues ≤ 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
San Luis Obispo County	48	18,476	21.4	8,115	87.4	54.2	45.9	4.5	45.8	8.1	0.0	
Santa Barbara County	61	14,493	27.2	9,984	84.9	50.8	47.4	5.8	49.2	9.3	0.0	
Ventura County	115	34,294	51.3	22,773	86.2	40.9	49.3	5.4	59.1	8.4	0.0	
<b>Total</b>	<b>224</b>	<b>67,263</b>	<b>100.0</b>	<b>40,872</b>	<b>86.1</b>	<b>46.4</b>	<b>48.1</b>	<b>5.3</b>	<b>53.6</b>	<b>8.6</b>	<b>0.0</b>	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues ≤ 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
San Luis Obispo County	20	7,733	17.4	12,602	87.4	60.0	38.1	4.6	40.0	8.0	0.0	
Santa Barbara County	33	10,882	28.7	13,631	84.7	51.5	40.1	5.8	48.5	9.5	0.0	
Ventura County	62	19,313	53.9	32,805	86.4	41.9	40.9	5.4	58.1	8.2	0.0	
<b>Total</b>	<b>115</b>	<b>37,928</b>	<b>100.0</b>	<b>59,038</b>	<b>86.2</b>	<b>47.8</b>	<b>40.1</b>	<b>5.3</b>	<b>52.2</b>	<b>8.5</b>	<b>0.0</b>	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.