



PUBLIC DISCLOSURE

April 27, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Goldwater Bank, National Association
Charter Number: 24671

2525 East Camelback Road, Suite 1100
Phoenix, AZ 85016

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 **Satisfactory**.

The lending test is rated: Satisfactory.

Goldwater Bank, National Association's (GBNA or "bank") lending performance reflects satisfactory responsiveness to community credit needs. The lending test rating is based on the bank's performance in Maricopa County, Arizona. The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is more than reasonable given the bank's size, financial condition, and credit needs of the assessment area (AA).
- The geographic distribution of loans reflects reasonable distribution throughout the AA.
- Lending activities represent a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.
- GBNA originated a substantial majority of loans outside the AA; this is due to the bank's business strategy of originating home mortgage loans throughout the United States.

Loan-to-Deposit Ratio

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

We analyzed the bank's quarterly average LTD ratio over the 11 quarters since the prior examination through December 31, 2019. GBNA's average LTD ratio substantially exceeded the combined quarterly average of similar banks in the AA. The bank's average LTD ratio was 103.08 percent and ranged from a low of 84.45 percent to a high of 117.29 percent. The combined quarterly average LTD ratio of four similar institutions was 75.47 percent and ranged from a low of 67.83 percent to a high of 92.87 percent.

Lending in Assessment Area

A substantial majority of the bank's loans are outside its assessment area. 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.

Based on GBNA's reported data, the bank originated and purchased 1.6 percent of its home mortgage loans inside the bank's AA during the evaluation period. The poor performance under this test correlates to GBNA's primary business strategy of providing mortgage loans throughout the country. The bank originated or purchased 219 mortgage loans totaling \$63.5 million in Maricopa County. In addition to home mortgages, the bank originated some commercial loans in the AA which are not reflected in the table as it is not a primary lending product for the bank. This performance factor had a neutral impact on the bank's lending performance.

Lending Inside and Outside of the Assessment Area 2017 – 2019										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	219	1.6	13,707	98.4	13,926	63,517	1.9	3,223,576	98.1	3,287,093
<i>Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0.</i>										

Description of Institution

Goldwater Bank, National Association is an independent, full-service community bank headquartered in Phoenix, Arizona. GBNA opened for business in April 2007. The bank does not have a holding company. However, it is affiliated by ownership to Weststar Mortgage Corporation, located in Albuquerque, New Mexico, through a change in control of the bank to Kent Wiechert that was completed in 2015.

The bank operates the main office as a full-service branch in an upper-income census tract (CT). GBNA does not offer drive-up teller access or operate any deposit taking automated teller machines (ATMs). However, the bank refunds all ATM fees to customers who utilize that service through other institutions.

GBNA's primary focus is on offering mortgage loan products to borrowers across the country. The bank has approximately 47 loan production offices (LPOs) in operation, which strictly originate home mortgage loans. The LPOs are located in Alabama, Arizona, Florida, Georgia, Louisiana, Maryland, Minnesota, Missouri, Mississippi, New Mexico, Ohio, Oklahoma, Oregon, Texas, and Utah. During the evaluation period, the bank opened 13 LPOs and closed six LPOs. Currently, there are two LPOs located in Maricopa County, the bank's designated assessment area (AA). 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. However, commercial loans are not considered a primary product.

As of December 31, 2019, the bank reported total assets of \$187.5 million, total deposits of \$149.8 million, total loans of \$161.5 million, and Tier 1 capital of \$19.7 million. Total loans represented approximately 86.1 percent of total assets. During the review period, an average of approximately 39.3 percent of the bank's deposits consisted of internet-sourced Qwik Rate Certificates of Deposit and home mortgage loan escrow deposits, which were used to fund growth in the LPOs.

There are no financial or legal impediments that impede the bank's ability to help meet the credit needs of the AA. The bank received a "Needs to Improve" rating under the small bank CRA procedures at the June 12, 2017 CRA examination.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assesses the Community Reinvestment Act (CRA) performance of GBNA, using Small Bank CRA examination procedures. For the lending test we determined the bank's primary product is home mortgage loans. The evaluation period for the lending test is January 1, 2017 through December 31, 2019. We performed a full-scope examination of the bank's sole assessment area, Maricopa County. Refer to appendix A for detailed information.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were 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.

GBNA has only one AA. All weighting for the evaluation is placed on the Maricopa County AA.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating 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 Arizona

CRA rating for the State of Arizona: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the bank's AA.
- Lending activities represent a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

Description of Institution's Operations in Arizona

GBNA is an independent, full-service community bank headquartered in Phoenix, Arizona. The bank operates the main office as a full-service branch in an upper-income census tract (CT). The bank does not offer drive-up teller access or operate any deposit taking ATMs. However, the bank refunds all ATM fees to customers who utilize that service through other institutions.

GBNA has designated Maricopa County as its AA. The county makes up a portion of the Phoenix-Mesa-Chandler, Arizona Metropolitan Statistical Area (MSA) and includes 916 CTs: 105 are low-income; 206 are moderate-income; 286 are middle-income; and 306 are upper-income. In addition, 13 CTs do not report data and are listed as unknown. The AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income (LMI) geographies.

Competition in the Maricopa County AA is strong. The FDIC Deposit Market Share report indicated as of June 30, 2019, GBNA's deposits inside the AA were \$145.3 million and ranked 38th in deposit market share with 0.13 percent of the AA's deposits. A total of 62 financial institutions, with a combined 760 branches, competed for over \$107.8 billion of insured deposits in Maricopa County. This includes three nationwide mega-banks with 387 branches that account for 62.0 percent of the deposit market share, representing \$67.0 billion in deposits.

We utilized four recent community contacts that were performed with three nonprofit organizations serving the Maricopa County AA. The contacts all identified that the overwhelming need for LMI individuals is affordable housing for rental or purchase; however, housing inventory is limited and expensive. Incomes have not increased at the same rate that housing prices have appreciated, limiting LMI purchasing. The contacts stated banks are receptive to the communities' needs and they donate when they can, but donations are limited to bank employees who volunteer, join boards, or meet with leadership when requested. Some banks have presented financial wellness and how to avoid predatory lending workshops. Although there are lending opportunities in the AA for banks to step up and provide micro-

loans, flexible home lending programs, and small business lending; the contacts indicated that these needs are not being met by traditional financial institutions.

Table A below contains demographic information on the AA including a median housing value of \$203,811. Affordable housing and LMI services are needed with 23.3 percent of households considered as low-income and 12.6 percent of families below the poverty level.

Maricopa County

Table A – Demographic Information of the Assessment Area						
Assessment Area: Maricopa County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	916	11.5	22.5	31.2	33.4	1.4
Population by Geography	4,018,143	11.1	22.9	31.3	34.4	0.3
Housing Units by Geography	1,668,555	9.8	23.4	33.3	33.4	0.1
Owner-Occupied Units by Geography	875,327	4.6	18.8	34.7	41.9	0.0
Occupied Rental Units by Geography	567,191	17.1	29.4	31.2	21.9	0.3
Vacant Units by Geography	226,037	11.8	25.6	33.2	29.3	0.2
Businesses by Geography	419,998	6.2	15.9	28.4	48.9	0.5
Farms by Geography	7,681	6.1	18.0	29.4	46.2	0.3
Family Distribution by Income Level	945,115	21.8	16.9	19.2	42.2	0.0
Household Distribution by Income Level	1,442,518	23.3	16.3	17.7	42.7	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Chandler, AZ MSA		\$63,686	Median Housing Value			\$203,811
			Median Gross Rent			\$993
			Families Below Poverty Level			12.6%

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.

Scope of Evaluation in Arizona

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. Consistent with GNBA's business strategy, the bank's primary product by number and dollar is home mortgage loans. The evaluation period for the lending test is January 1, 2017 through December 31, 2019. 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 cost of housing in the AA, 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.

LENDING TEST

The bank's performance under the Lending Test in Arizona is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Maricopa County AA is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of mortgage loans in the State.

Home Mortgage Loans

Refer to Table O in the state of Arizona 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.

GBNA's overall distribution of mortgage loans within the AA shows reasonable distribution in low- and moderate-income geographies. During 2017-2019, the bank originated or purchased 219 loans in Maricopa County. Of those loans, 3.2 percent were located in low-income CTs. This distribution is near to the 4.6 demographic percentage and the 4.0 aggregate lending percentage, reflecting reasonable distribution. Additionally, the bank originated or purchased 19.6 percent of loans in moderate-income CTs. This exceeds the 18.8 demographic percentage and the 15.8 aggregate lending percentage, reflecting excellent distribution.

In addition to home mortgage loans, the bank facilitated lending in LMI geographies through a \$1.5 million line of credit to a borrower who provides short-term funding for investors to rehabilitate houses. Many of the houses are located in LMI areas. During the evaluation period, GBNA provided funding for 65 rehabilitation loans. Of these, 50 loans totaling \$5.4 million were located in LMI CTs in the bank's AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of mortgage loans to individuals of different income levels, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Arizona 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.

GBNA's overall distribution of mortgage loans in Maricopa County to LMI borrowers is reasonable. During the evaluation period, the bank originated or purchased 3.2 percent of its loans to low-income borrowers. This percentage is significantly below the demographic

percentage of 21.8 and below the aggregate lending percentage of 5.1, reflecting less than reasonable distribution. However, the bank's distribution of mortgage loans to moderate-income borrowers of 16.0 percent is near to the demographic percentage of 16.9 and exceeds the aggregate of 15.9 percent, reflecting excellent distribution. With a median housing value of \$203,811 and 21.8 percent of the AA considered as low-income, the availability of affordable homes for LMI borrowers was limited. In 2019, the median housing cost represented 5.6 times the income for low-income families. In addition, 12.6 percent of families in the AA are below poverty. This made mortgage loan affordability a challenge and reduced opportunities for all lenders in the AA as reflected in the aggregate percentages. Given external factors limiting the bank's ability to provide mortgage loans for low-income borrowers, the bank's distribution to moderate-income borrowers received primary weight. With this performance context, the bank's overall distribution of mortgage loans is reasonable.

Responses to Complaints

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

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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”.

Time Period Reviewed:	1/1/2017 to 12/31/2019	
Bank Products Reviewed:	Home mortgage loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Arizona		
Maricopa County	Full-scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS	Goldwater Bank
Overall Bank:	Lending Test Rating
Goldwater Bank	Satisfactory
MMSA or State:	
Arizona	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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 30th 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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19	
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	
Maricopa County AA	219	63,517	100.0	190,706	4.6	3.2	4.0	18.8	19.6	15.8	34.7	31.5	35.5	41.9	45.7	44.1	0.0	0.0	0.6	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 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																			2017-19	
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	
Maricopa County AA	219	63,517	100.0	190,706	21.8	3.2	5.1	16.9	16.0	15.9	19.2	25.6	20.4	42.2	43.4	40.9	0.0	11.9	17.8	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data; 2018 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0%.																				