



PUBLIC DISCLOSURE

May 26, 2020

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

New Omni Bank, National Association

Charter Number 16840

1235 South Garfield Avenue
Alhambra, CA 91801

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

The community development test is rated: Satisfactory

The overall performance of New Omni Bank, National Association (NOB or bank) reflects satisfactory responsiveness to community credit needs. The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and business strategy.
- The bank originated a majority of its loans within its AA.
- The geographic distribution of loans reflects reasonable distribution throughout the bank's AA.
- Overall, lending activities represent reasonable distribution to individuals of different income levels and businesses of different sizes.
- The bank's community development activities demonstrate an adequate level of responsiveness based upon available opportunities in the AA during the evaluation period.

Loan-to-Deposit Ratio

NOB's LTD ratio is reasonable. OCC examiners analyzed the bank's quarterly average LTD ratio for the 11 quarters since the previous CRA examination through December 31, 2019. NOB's average LTD ratio was 101 percent, with a high of 112 percent and a low of 94 percent. For purposes of comparison, OCC examiners selected four banks that NOB considers direct competitors for loans and deposits in its AA. The combined quarterly average LTD ratio for these institutions over the same period was 100 percent. The average LTD ratios ranged from a high of 117 percent to a low of 90 percent.

Lending in Assessment Area

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

NOB originated and purchased a total of 61 percent of the number of loans and 52 percent of the total dollar volume of loans inside the bank's AA 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 AA.

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	93	44.1	118	55.9	211	81,311	46.6	93,031	53.4	174,342
Small Business	14	70.0	6	30.0	20	22,155	82.5	4,690	17.5	26,845
Consumer-Auto Loans	123	84.2	23	15.8	146	1,636	81.8	366	18.2	2,001
Total	230	61.0	147	39.0	377	105,102	51.7	98,087	48.3	203,188
<i>Source: Evaluation Period: 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0.</i>										

Description of Institution

New Omni Bank, N.A. is an intrastate full-service community bank headquartered in Alhambra, California. The bank was chartered in February 1980 as a minority-owned depository institution named Monterey Park National Bank. The name was changed to Omni Bank, N.A. in 1990 and then to New Omni Bank, N.A. in May 2011. The bank is controlled by CKH Capital, Inc., a one-bank holding company, headquartered in Alhambra. The bank has no subsidiary or affiliate relationships and has not been involved in any merger or acquisition activity since the prior Community Reinvestment Act (CRA) examination.

The bank operates three full-service branches in the Los Angeles-Long Beach-Glendale, California Metropolitan Division (MD), which the bank has selected as its AA. The MD is comprised entirely by Los Angeles County, and is inclusive of part of the Los Angeles-Long Beach-Anaheim, California Metropolitan Statistical Area (MSA). The main branch is located in Alhambra, California in a middle-income census tract (CT). The second branch is located in Rowland Heights, California, a moderate-income CT. During the evaluation period, the bank opened the third branch in an upper-income CT located in Arcadia, California. NOB did not close any branches during the evaluation period. The bank offers a variety of traditional banking products to both retail and commercial customers. The bank does not have automated teller machines (ATMs) or drive-up teller access and does not offer customers any other type of ATM access. However, NOB offers a variety of alternative banking services including telephone banking, on-line banking, bill payment, and direct deposit.

As of December 31, 2019, New Omni Bank reported total assets of \$460 million, total loans of \$367 million, total deposits of \$377 million, and tier 1 capital of \$70 million. Net loans represented 78 percent of total assets. The bank's primary business strategy is commercial loans, including commercial real estate, commercial and industrial loans, Small Business Administration (SBA) lending, home mortgage loans with a focus on lending to foreign nationals, and consumer auto loans.

There are no legal, financial, or other factors that impede the bank’s ability to meet the credit needs in its community. New Omni Bank received a “Satisfactory” rating under the intermediate small bank CRA procedures at the prior CRA examination dated May 15, 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assesses the CRA performance of New Omni Bank using Intermediate Small Bank (ISB) CRA procedures. This included an evaluation of CRA activities under the Lending Test criteria, as well as an evaluation of activities under the Community Development Test. OCC examiners performed a full-scope examination of the bank’s sole assessment area, the Los Angeles County AA. Refer to appendix A for detailed information.

The OCC reviewed the bank’s primary product of loans to small businesses, in addition, to home mortgage and consumer auto loan originations. This evaluation also included an assessment of the bank’s CD lending, investments, and services activities. The evaluation period for the lending test is January 1, 2017 through December 31, 2019. The evaluation period for the community development test is May 15, 2017 through December 31, 2019.

Loan Originations as a % of Total Originations	% of Dollar Amount of Loans	% of Number of Loans
Small Business Loans	71.5%	43.6%
Home Mortgage Loans	28.0%	29.8%
Consumer Auto Loans	0.5%	26.6%

Source: Loan originations for evaluation period.

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 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.

NOB has only one AA. All weighting for the evaluation is placed on the Los Angeles County AA. Consistent with NOB's business strategy, the OCC placed more weight on the bank's primary product of loans to small businesses. However, in assessing the bank's distribution of home mortgage loans to low- and moderate-income (LMI) borrowers, we 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 more populated areas within the AA, which impacted the availability of affordable homes for LMI individuals and reduced the opportunities for home purchase lending for all lenders during the review period.

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 California

CRA rating for the State of California: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development 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 and businesses of different sizes.
- NOB's aggregate level of responsiveness to CD needs is adequate.

Description of Institution's Operations in California

Los Angeles County

New Omni Bank, N.A. designated the Los Angeles-Long Beach-Glendale, California Metropolitan Division (MD) as its AA. The MD is comprised entirely of Los Angeles County, which in turn makes up part of the Los Angeles-Long Beach-Anaheim, California Metropolitan Statistical Area (MSA). Based on the 2015 American Community Survey (ACS) data, Los Angeles County consists of 2,346 census tracts; 221 are low-income, 674 are moderate-income, 583 are middle-income, 817 are upper-income, and 51 have not been assigned an income classification. The City of Los Angeles is the most populous city in the AA. Los Angeles County, as of July 2019 had an estimated population of 10.0 million, making it the most populous county in the United States. During the evaluation period, the unemployment rate in Los Angeles County fluctuated from a high of 5.4 percent to a low of 4.0 percent according to the U.S. Bureau of Labor Statistics. The primary industries in the county are education and health services, transportation, trade, and utilities, professional and business services, leisure and hospitality. The AA meets the legal requirements of the regulation and does not arbitrarily exclude low- or moderate-income census tracts.

New Omni Bank, N.A. operates solely within the Los Angeles County AA with three branch locations and does not operate any ATMs. Competition from other financial institutions is strong in the Los Angeles County AA. As of June 30, 2019, the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report indicates that the bank's deposits inside the AA total \$351.8 million. The bank ranks 51st and has a market share of 0.08 percent. A total of 101 financial institutions, with a combined 1,715 branches, compete for approximately \$440 billion of insured deposits within Los Angeles County. This includes three nationwide mega-banks with a combined 775 branches that account for 43 percent of the deposit market share, representing \$190 billion in deposits.

To assess community needs, the OCC used information from recent interviews with four community organizations providing services in Los Angeles. The contacts included three community development corporations and a community housing organization. All of the contacts mentioned a primary community need for affordable housing. Limited housing stock has resulted in rising housing costs, displacement of LMI individuals, and a rising homeless population. There have been demographic changes in historically LMI areas. In addition, the contacts stated there is a need for small business and micro-loan products with the rise in predatory lending products by nonbank institutions. There are opportunities for banks to provide bilingual affordable credit counseling and financial literacy education to assist LMI borrowers in participating in affordable housing programs. There are also opportunities for banks to provide small businesses with lower-cost financing and technical assistance, and to partner with Community Development Financial Institutions (CDFIs) to further penetrate the market.

Table A – Demographic Information of the Assessment Area

Assessment Area: Los Angeles County

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper% of #	NA* % of #
Geographies (Census Tracts)	2,346	9.4	28.7	24.9	34.8	2.2
Population by Geography	10,038,388	8.6	29.3	26.3	35.1	0.8
Housing Units by Geography	3,476,718	7.8	26.3	24.8	40.6	0.5
Owner-Occupied Units by Geography	1,499,879	2.4	17.2	26.6	53.7	0.1
Occupied Rental Units by Geography	1,763,190	12.2	34.2	23.6	29.2	0.9
Vacant Units by Geography	213,649	8.7	25.4	22.8	42.2	1.0
Businesses by Geography	894,491	4.6	18.6	21.3	53.1	2.3
Farms by Geography	8,582	2.7	17.1	25.0	54.0	1.2
Family Distribution by Income Level	2,186,485	24.5	16.3	16.7	42.4	0.0
Household Distribution by Income Level	3,263,069	25.9	15.4	15.8	43.0	0.0
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA		\$62,703	Median Housing Value			\$495,540
			Median Gross Rent			\$1,292
			Families Below Poverty Level			14.3%

*Source: 2015 ACS and 2019 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, 2017 through December 31, 2019. Consistent with NOB's business strategy, the OCC placed more weight on the bank's primary product of loans to small businesses. However, in assessing the bank's distribution of home mortgage loans to LMI borrowers, we 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 more populated areas within the AA, which impacted the availability of affordable homes for LMI and reduced the opportunities for home purchase lending for all lenders during the review period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review of Los Angeles County, the bank's lending performance in the state of California is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of home mortgage loans, small loans to businesses, and consumer auto 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.

Overall, the bank's geographic distribution of home mortgage loans in LMI CTs in the Los Angeles County AA reflects reasonable distribution.

The bank originated 1.1 percent of home mortgage loans in low-income CTs, representing poor distribution. The demographic percentage of owner-occupied housing units is 2.4 percent and aggregate lending is 3.3 percent in these CTs. In moderate-income CTs, the bank originated 19.4 percent of home mortgage loans, which exceeded both the 17.2 percent of owner-occupied housing units and the 19.0 percent of aggregate lending in these CTs. This represents 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.

Overall, the bank's geographic distribution of small loans to businesses in LMI CTs in the Los Angeles County AA reflects reasonable distribution.

The bank originated 1.0 percent of small loans to businesses in low-income CTs, representing poor distribution. The demographic percentage of businesses is 4.6 percent and aggregate lending is 4.0 percent in these CTs. The low demographic indicates that there are not a lot of businesses located in low-income CTs in Los Angeles County. The bank originated 78.1 percent of small loans to businesses

in moderate-income CTs, which exceeded both the 18.6 percent of businesses and 18.9 percent of aggregate lending in these CTs. This represents excellent distribution.

Consumer Loans - Auto

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

Overall, the bank's geographic distribution of consumer auto loans in LMI CTs in the Los Angeles County AA reflects reasonable distribution.

The bank originated 3.3 percent of consumer auto loans in low-income CTs, representing poor distribution. The demographic percentage of households is 7.7 percent in these CTs. The bank originated 46.3 percent of consumer auto loans in moderate-income CTs, which exceeded the 26.4 percent of households in these CTs. This represents excellent distribution.

Lending Gap Analysis

The OCC reviewed summary reports and maps and analyzed the bank's home mortgage, small business, and consumer auto lending activity over the evaluation period to identify any gaps in geographic distribution of loans. The OCC did not identify any unexplained conspicuous gaps in the bank's AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable 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.

Overall, the distribution of home mortgage loans to LMI families reflects very poor distribution in the Los Angeles County AA. Low aggregate lending percentages reflect the challenging mortgage lending opportunities in the AA for LMI families.

The bank did not originate any home mortgage loans to low-income borrowers, representing very poor distribution in the AA. The demographic percentage of low-income families was 24.5 percent and aggregate peer data was 2.9 percent in the AA. The bank did not originate any home mortgage loans to moderate-income borrowers, reflecting very poor distribution. Demographics show 16.3 percent of moderate-income families and 5.8 percent of aggregate lending are in the AA. It is important to note that the high cost of housing in the AA makes it difficult for low-income families, which earn less than \$32,000, and moderate-income families, which earn less than \$62,700, to purchase and own a home in the AA, where the median home price, per Table A, is \$495,540.

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.

Overall, the distribution of loans to small businesses reflects excellent distribution to businesses of different sizes in the Los Angeles County AA.

The bank originated 90.6 percent of loans to businesses with revenues less than or equal to \$1.0 million. This exceeded both the 89.2 percent of businesses and 47.2 percent of aggregate lending in the AA. This represents excellent distribution. The aggregate lending percentage indicates that a number of businesses with revenues less than or equal to \$1.0 million do not seek out lending opportunities.

Consumer Loans - Auto

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

Overall, the distribution of consumer auto loans to individuals of different income levels reflects excellent distribution in the Los Angeles County AA.

The bank originated 46.3 percent of consumer auto loans to low-income borrowers, exceeding the demographic of 25.9 percent of households in the AA. This represents excellent distribution. The bank originated 44.7 percent of consumer auto loans to moderate-income borrowers, exceeding the AA demographic of 15.4 percent of households. This represents 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.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in its AA through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's assessment area.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Los Angeles County	19	100	\$13,868	100

The bank's community development lending represents a satisfactory level of CD loans and reflects an adequate responsiveness to the needs within the bank's AA. The majority of the loans, 87 percent, provided economic development for LMI individuals, which supported job creation and retention, and business expansion for small businesses. Six percent provided community services such as refinancing a laundromat in an LMI CT. The remaining loans, five percent, provided affordable housing for LMI individuals and families to rehabilitate/remodel multi-family units located in LMI CTs.

Number and Amount of Qualified Investments

The Qualified Investments Table, shown below, sets forth the information and data used to evaluate the bank's level of qualified CD investments and donations. This table includes all CD investments and donations, including any prior period investments that remain outstanding as of the examination date.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments **	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Los Angeles County	3	\$747	14	\$1,002	17	50.0	\$1,749	31.9	0	\$0
***Outside AA	6	\$1,494	11	\$2,241	17	50.0	\$3,735	68.1	0	\$0
Total	9	\$2,241	25	\$3,243	34	100.0	\$5,484	100.0	0	\$0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.
 ***Outside AA include MDI investments, Red Cross, and Community Foundation of Sonoma County donations.

During the evaluation period, the bank provided 10 investments/donations totaling \$15.4 thousand in Los Angeles County. This represents an adequate level of responsiveness to the CD needs in the AA. The qualified investments included donations to affordable housing programs which support homeless students and students in foster care; community services dedicated to LMI youth programs; and a school for the blind serving LMI students. The investments also provided economic development by investing in a nonprofit organization which offers programs structured to revitalize the physical, economic, and social life of the AA. In addition, the bank made two donations outside the AA, one to the American

Red Cross for Hurricane Harvey disaster relief and one to the Community Foundation of Sonoma County for the North Bay fire relief.

The bank also invested in Minority Depository Institutions (MDIs). During the current period, the bank invested in thirteen MDIs totaling \$3.2 million, of which four were invested in MDIs inside the AA for \$987 thousand while nine were outside the AA totaling \$2.2 million. During the prior period, the bank invested in nine MDIs totaling \$2.2 million, of which \$747 thousand was invested in MDIs inside the bank's AA. This shows the bank's excellent responsiveness to invest in minority institutions inside and outside of the AA.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, bank employees contributed 327 hours of qualified community development service hours. This represents an adequate level of responsiveness to the community's needs in Los Angeles County. The employees used their financial expertise to provide LMI veterans and LMI families with first-time homebuyers' education, provide financial education to LMI children and young adults in schools where a majority of the students receive free or reduced-price lunches, and support a non-profit CDFI organization by donating and servicing computers used by LMI individuals in Los Angeles County.

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, small business, and consumer loans Community development loans, qualified investments, and services	
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
California		
Los Angeles County	Full-scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS		New Omni Bank	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
New Omni Bank	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
California	Satisfactory	Satisfactory	Satisfactory

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

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 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 U. Assessment Area Distribution of Consumer 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 households in those geographies.

Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

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		
Los Angeles County	93	81,311	100.0	209,162	2.4	1.1	3.4	17.2	19.4	19.0	26.6	21.5	25.9	53.7	58.1	51.5	0.1	0.0	0.1		

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		
Los Angeles County	93	81,311	100.0	209,162	24.5	0.0	2.9	16.3	0.0	5.8	16.7	1.1	13.5	42.4	72.0	59.3	0.0	26.9	18.5		

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-19																			
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Los Angeles County	20	24,575	100.0	342,283	4.6	1.0	4.0	18.6	78.1	18.9	21.3	3.3	22.1	53.1	17.7	53.2	2.3	0.0	1.8
<i>Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data; Due to rounding, totals may not equal 100.0%.</i>																			

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-19											
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Los Angeles County	20	24,575	100.0	342,283	89.2	90.6	47.2	4.7	9.4	6.1	0
<i>Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data; Due to rounding, totals may not equal 100.0%.</i>											

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-19	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Los Angeles County	123	1,636	100.0	7.7	3.3	26.4	46.3	24.9	30.1	40.5	20.3	0.5	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data; Due to rounding, totals may not equal 100.0%.</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-19	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Los Angeles County	123	1,636	100.0	25.9	46.3	15.4	44.7	15.8	5.7	43.0	3.3	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data; Due to rounding, totals may not equal 100.0%.</i>														