



## **PUBLIC DISCLOSURE**

May 30, 2023

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Bank of Whittier, National Association  
Charter Number 17548

15141 East Whittier Boulevard  
Whittier, CA 90603

Office of the Comptroller of the Currency

Santa Ana Office  
1551 North Tustin Avenue, Suite 1050  
Santa Ana, CA 92705

**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.

### **CONCLUSIONS**

The bank substantially achieved its plan goals for a satisfactory rating.

- The bank exhibits an outstanding level of low- and moderate-income (LMI) mortgage lending. Bank of Whittier (BoW or bank) exceeded the LMI lending goals for outstanding performance set forth in the Community Reinvestment Act (CRA) Strategic Plan.
- The bank exhibits an outstanding level of community development (CD) lending. BoW exceeded the goals for outstanding performance set forth in the CRA Strategic Plan.
- The bank exhibits a satisfactory level of CD investments. BoW met the goals for satisfactory performance set forth in the CRA Strategic Plan.
- The bank exhibits a satisfactory level of CD services. BoW met the goals for satisfactory performance set forth in the CRA Strategic Plan.
- The bank exhibits a satisfactory level of investments that support minority-owned financial institutions (MFIs). BoW met the goals for satisfactory performance set forth in the CRA Strategic Plan.

## Description of Institution

Bank of Whittier, National Association is a minority-owned institution that opened in December 1982. It is an independent interstate community bank headquartered in Whittier, California. In addition to operating in California, BoW also operates a branch in Richardson, Texas. Operations expanded into Texas in June 2011, to increase business opportunities in a market familiar to management. BoW specializes in the Riba-Free (RF) banking discipline which relies on an alternative methodology for financing, evaluating, and pricing bank products to faith-based communities. The RF discipline focuses on looking at each lending facility as an investment, and not as a money renting operation at a rental rate called interest rate. BoW focuses on serving first generation immigrant professionals who are underserved by other institutions.

BoW is a wholly owned subsidiary of Greater Pacific Bancshares (GPB), a privately owned, one-bank holding company. GPB, located in Whittier, California, was established in 1989, and owns 100 percent of BoW. As of December 31, 2021, GPB reported total assets of \$19.24 million.

BoW adopted the CRA Strategic Plan enabling it to serve its assessment areas consistent with the regulation, while also allowing the organization to respond to unmet RF banking needs it is uniquely qualified to address outside of the defined markets. BoW offers traditional deposit and loan products for both consumer and commercial customers such as checking and savings accounts, mortgage loans, commercial real estate loans, commercial and industrial loans, and consumer loans. A significant majority of the bank's loan originations are residential mortgages. BoW also grants customers online access to account information through its website. Both the Whittier and Richardson branches provide customers with access to automated teller machines (ATMs). Both branches are open Monday through Friday from 9:00 a.m. to 5:00 p.m. During the COVID-19 pandemic, the bank maintained their standard branch hours and did not temporarily reduce branch hours.

The bank has designated Whittier, CA and Richardson, TX as its assessment areas (AAs). The Whittier AA is composed of all of Orange County, the southwestern portion of Los Angeles County, and small western portions of Riverside and San Bernardino Counties. The AA is comprised of 2,915 census tracts (CTs), of which 260 are low-income and 813 are moderate-income. The AA is densely populated with approximately 13.3 million individuals and 4.3 million households. Nearly 12.8 percent of families are below the poverty level. The Richardson AA consists of the entirety of the Dallas-Fort Worth-Arlington, TX Metropolitan Statistical Area (MSA). The AA is comprised of 1,312 CTs, of which 169 are low-income and 337 are moderate-income. The AA is highly populated with approximately 6.7 million individuals and 2.4 million households. Nearly 11.3 percent of families are below the poverty level. Both AAs meet the requirements of the regulation and do not arbitrarily exclude LMI geographies. No branches were opened or closed during the evaluation period.

The bank has grown during the evaluation period to \$164.68 million in total assets as of December 31, 2021, from \$55.96 million as of December 31, 2018. Common equity tier 1 capital also grew during the same time period to \$19.48 million from \$10.41 million. The bank reported total deposits of \$144.35 million and net loans of \$43.53 million as of December 31, 2021. Loans are centered in commercial loans secured by real estate and residential mortgage loans. According to the FDIC Deposit Market Share Report as of June 30, 2021, in the Whittier AA, BoW ranked 100th out of 124 financial institutions with deposits of \$137.15 million, for 0.02 percent of the market share. In the Richardson AA, BoW ranked 158th out of 169 financial institutions with deposits of \$8.83 million, for 0.00 percent of the market share.

There are no financial or legal factors that impede the bank's ability to meet the credit needs of the communities it serves. The bank's rating at the previous CRA Performance Evaluation dated January 28, 2019, was "Satisfactory" under the small bank CRA procedures.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The evaluation period is January 1, 2019 through December 31, 2021. BoW's CRA evaluation goals are set forth in the Strategic Plan dated August 8, 2018, and effective from January 1, 2019 through December 31, 2023. The Strategic Plan was approved by the OCC on August 23, 2018.

CRA regulations require BoW to specify measurable goals for helping to meet the credit needs of its AAs covered by the Strategic Plan through lending, investments and services, as appropriate. The bank defined its goals with consideration of its business model and the needs and opportunities in its AAs. The Strategic Plan established five specific goals with measurable performance requirements for Outstanding and Satisfactory ratings:

- Goal 1: Low- and Moderate-Income Mortgage Lending
- Goal 2: Community Development Lending
- Goal 3: Community Development Investments and Donations
- Goal 4: Community Development Services
- Goal 5: Investments in Minority-Owned Financial Institutions

The OCC evaluates a financial institution's activities under the CRA based on information regarding the institution's capacity, constraints, business strategies, competitors, and peers, and the community's demographic and economic data and lending, investment, and service opportunities. These factors were considered in approving the specific goals established in the Strategic Plan.

The OCC evaluated BoW's performance based on the stated goals for Satisfactory and Outstanding ratings as approved in the Strategic Plan.

### **Selection of Areas for Full-Scope Review**

Both of the bank's AAs, the Whittier, CA AA and the Richardson, TX AA, received a full-scope review.

### **Ratings**

The bank's overall rating is based on the performance as agreed upon in the strategic planning application process.

## **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 assessment area 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

### CONCLUSIONS WITH RESPECT TO PERFORMANCE IN CALIFORNIA

The bank achieved its Strategic Plan goals for a satisfactory rating within the state of California.

### DISCUSSION OF PERFORMANCE IN THE WHITTIER ASSESSMENT AREA

The lending test is based on performance under Goals 1 and 2 of the Strategic Plan. The CD test is based on performance under Goals 3 through 5 of the Strategic Plan.

**The Lending Test is rated:** Satisfactory

#### Goal 1: Low- and Moderate-Income Mortgage Lending

The bank exceeded the Satisfactory annual percentage goals for lending in LMI Geographies in the Whittier AA, culminating in a total Aggregate of the Annual Percentage Goal of 27.1 percent. Despite past challenges that precluded the bank from originating mortgage loans in LMI geographies in the AA, during the evaluation period four mortgage originations were extended in moderate-income geographies. The aggregate dollar amount of lending in LMI geographies was \$2.53 million. The bank exceeded the \$1.9 million minimum commitment goal for LMI lending for the entire 5-year term of the Strategic Plan.

Goal #1 Low- and Moderate-Income Mortgage Lending Whittier Assessment Area						
Performance Measurement	Performance Factor	Interim Annual Goals (Percentage of AA Mortgage Originations)			Aggregate of Annual Percentage Goal	Performance Rating
		2019	2020	2021		
Whittier AA Low- and Moderate-Income mortgage originations as a percentage of total Whittier AA mortgage originations.	LMI Geographies	5%	5%	5%	15%	Satisfactory
		10%	10%	10%	30%	Outstanding
<i>Actual Performance</i>		<i>11.1%</i>	<i>8.3%</i>	<i>7.7%</i>	<i>27.1%</i>	<i>Satisfactory</i>

The bank exceeded the Satisfactory annual percentage goals for lending to LMI Borrowers in the Whittier AA, culminating in a total Aggregate of Annual Percentage Goal of 4.2 percent. Despite past challenges that precluded the bank from originating mortgage loans to LMI borrowers in the AA, during the evaluation period one mortgage origination was extended to a moderate-income borrower. The aggregate dollar amount of lending to LMI borrowers was \$100,000,000.



Goal #1 Low- and Moderate-Income Mortgage Lending Whittier Assessment Area						
Performance Measurement	Performance Factor	Interim Annual Goals (Percentage of AA Mortgage Originations)			Aggregate of Annual Percentage Goal *	Performance Rating
		2019	2020	2021		
Whittier AA Low- and Moderate-Income mortgage originations as a percentage of total Whittier AA mortgage originations.	LMI Borrowers	0%	0%	0%	0%	Satisfactory
		3%	3%	3%	9%	Outstanding
<b>Actual Performance</b>		<b>0%</b>	<b>4.2%</b>	<b>0%</b>	<b>4.2%</b>	<b>Satisfactory</b>
* The Plan provides that if LMI Mortgage Lending performance does not meet the annual interim goals during a multi-year review period, the bank may be assigned a satisfactory rating for the category if performance in other years within the period make up the shortfall.						

### Goal 2: Community Development Lending

CD lending in the Whittier AA exceeded the Outstanding annual percentage goals for 2020 and 2021. The bank leveraged Small Business Administration (SBA) Paycheck Protection Program (PPP) loan originations to meet CD lending goals in the Whittier AA. The Aggregate of Annual Percentage Goal totaled 24.97 percent. Moreover, the aggregate amount of the originations over the three-year period was \$9.6 million, which significantly exceeded the minimum commitment goal of \$1.5 million for the five-year term of the Strategic Plan period.

Although the bank exceeded CD lending goals in the Whittier AA, it must be noted that the bank did no CD lending in 2019. The absence of activity in large part reflects the bank’s limited capacity to lend relative to market competition, particularly as it pertains to commercial loan facilities that typically fund community development. For example, the bank competes with a universe of business lenders including community development lenders and large banks with elevated capacity.

Goal #2 Community Development Lending Whittier Assessment Area						
Performance Measurement	Interim Annual Goals (Percentage of Total Gross Loans and Leases)			Aggregate of Annual Percentage Goal *	Performance Rating	
	2019	2020	2021			
New CD Loan Originations as a percent of Total Gross Loans and Leases.	0.90%	0.90%	1.05%	2.85%	Satisfactory	
	1.80%	1.80%	2.10%	5.70%	Outstanding	
<b>Actual Performance</b>		<b>0.00%</b>	<b>15.73%</b>	<b>9.24%</b>	<b>24.97%</b>	<b>Outstanding</b>
* The Plan provides that if Community Development Lending does not meet the annual interim goals during a multi-year review period, the bank may be assigned a satisfactory rating for the category if performance in other years within the period make up the shortfall.						

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

### Goal 3: Community Development Investments

The bank essentially met the Satisfactory annual percentage goal for CD Investments in the Whittier AA with a total of \$982,380 in investments and donations. The percentage would have been higher, except for the fact that during the evaluation period the bank’s equity tier 1 capital increased 87.2 percent. The unanticipated injections of capital skewed the ratios. New investments in 2019 and 2021 compensated

for performance in 2020, when the COVID-19 pandemic started, and the bank retained a prior period investment but made no new ones.

The bank’s investments in the Whittier AA totaled \$960,000 and were comprised of four deposits made in Community Development Financial Institutions (CDFIs). The Whittier AA offers a greater population of qualifying CDFIs, thus providing the bank easier reach in meeting its CD Investments objectives. As a result, the bank far exceeded the \$690,000 minimum commitment set for the AA for the entire 5-year term of the plan. Deposits in the CDFIs are perpetually maintained, with the bank consistently renewing funds at maturity. The selected CDFIs are largely located within Southern California’s Asian communities, with their financial services benefitting the surrounding LMI areas.

The bank also made six donations totaling \$22,380 to two charitable organizations, Access California Services and ICNA Relief, which are engaged in improving the quality of life for underrepresented communities living in California, and other select states. Access California Services is a charitable organization oriented towards serving and empowering the underserved Arab-American and Muslim-American communities by providing basic health and human services and other coaching programs. ICNA Relief was created as an organization to provide such valuable amenities as physical and mental health services, free food pantry, and social/family services to disadvantaged families and individuals, or disaster survivors.

Goal #3 Community Development Investments Whittier Assessment Area					
Performance Measurement	Interim Annual Goals (Percentage of Tier 1 Capital)			Aggregate of Annual Percentage Goal *	Performance Rating
	2019	2020	2021		
New community development investments as a percent of Tier 1 Capital.	1.5%	1.8%	2.1%	5.4%	Satisfactory
Aggregate of new and outstanding prior period community development investments as a percent of Tier 1 Capital.	3.0%	3.0%	4.0%	10.0%	Outstanding
<b>Actual Performance</b>	<b>1.75%</b>	<b>0.03</b>	<b>3.48%</b>	<b>5.3%</b>	<b>Satisfactory</b>
* The Plan provides that if Community Development Investments do not meet the annual interim goals during a multi-year review period, the bank may be assigned a satisfactory rating for the category if performance in other years within the period make up the shortfall.					

**Goal 4: Community Development Services**

The bank’s performance for CD Services in the Whittier AA was satisfactory based on performance context. Bank personnel concentrated their volunteer efforts on providing free tax preparation services through the Volunteer Income Tax Assistance (VITA) program. The VITA program is an IRS initiative designed to support free tax preparation services for the underserved and low-to-moderate income individuals and families. Employees also participated in basic financial literacy programs at a Whittier elementary school. In addition, bank personnel provided mortgage loan repayment assistance, including loan forbearance, loan workouts, and debt restructuring to borrowers, including LMI individuals, experiencing financial hardship as the result of the COVID-19 pandemic. Due to logistical challenges resulting from COVID-19 related physical restrictions, bank personnel were unable to log CD Services hours for 2021.

Goal #4 Community Development Services Whittier Assessment Area						
Performance Measurement		Interim Annual Goals (Hours)			Aggregate of Annual Hours Goal *	Performance Rating
		2019	2020	2021		
Category I Service	Services such as (1) Membership on Board or Committees; (2) Volunteered Bank personnel to provide financial-related Education.	12	14	15	41	Satisfactory
		28	28	36	92	Outstanding
<i>Actual Performance</i>						
Category I Service: Services such as (1) Membership on Board or Committees; (2) Volunteered Bank personnel to provide financial-related Education.		2	24	0	26	<i>Satisfactory</i> based on Performance Context
Financial-related borrower assistance in response to the Pandemic: Services that assist residents experiencing financial hardship, including LMI homeowners and nonprofits, i.e., loan forbearance, loan workouts, and debt restructuring.		NA	11.5	0	11.5	
<b>Total</b>		2	35.5	0	37.5	
* The Plan provides that if Community Development Services performance does not meet the annual interim goals during a multi-year review period, the bank may be assigned a satisfactory rating for the category if performance in other years within the period make up the shortfall.						

**Goal 5: Investments in Minority-Owned Financial Institutions**

Investments in MFIs for the Whittier AA exceeded the Outstanding annual percentage goal each year of the evaluation period. The bank placed a total of \$1.45 million in deposits in MFIs, far exceeding the \$300,000 minimum commitment for the 5-year term of the Strategic Plan. The bank’s strong performance is largely facilitated by the number of MFIs in the Whittier AA.

Goal #5 Deposits in Minority-owned Financial Institutions Whittier Assessment Area						
Performance Measurement		Interim Annual Goals (Percentage of Tier 1 Capital)			Aggregate of Annual Percentage Goal	Performance Rating
		2019	2020	2021		
New certificates of deposits in MFIs* in the bank’s AA as a percentage of Tier 1 Capital.		0.60%	0.60%	0.90%	2.10%	Satisfactory
Aggregate of new and outstanding prior period certificates of deposits in MFI* in the bank’s AA as a percentage of Tier 1 Capital.		1.80%	1.80%	2.10%	5.70%	Outstanding
<i>Actual Performance</i>						
New certificates of deposits in MFIs* in the bank’s AA as a percentage of Tier 1 Capital. (Excludes outstanding prior period certificates of deposit.)		3.43%	2.74%	2.31%	8.48%	<i>Outstanding</i>
* Excludes any MFI considered under the Community Development Investment goals.						

# State Rating

## State of Texas

**CRA Rating for the State of Texas:** Satisfactory

### CONCLUSIONS WITH RESPECT TO PERFORMANCE IN TEXAS

The bank achieved its Strategic Plan goals for a satisfactory rating within the state of Texas.

### DISCUSSION OF PERFORMANCE IN THE RICHARDSON ASSESSMENT AREA

The lending test is based on performance under Goals 1 and 2 of the Strategic Plan. The CD test is based on performance under Goals 3 through 5 of the Strategic Plan.

**The Lending Test is rated:** Outstanding

#### Goal 1: Low- and Moderate-Income Mortgages

The bank exceeded the Outstanding annual percentage goals for LMI Geographies in the Richardson AA culminating in a total Aggregate of Annual Percentage Goal of 74 percent. During the evaluation period 77 mortgage originations were extended in LMI geographies in the AA. The aggregate dollar amount of lending in LMI geographies was \$19.96 million. The bank vastly exceeded the \$7.6 million minimum commitment for LMI lending for the entire 5-year term of the Strategic Plan.

Goal #1 Low- and Moderate-Income Mortgage Lending Richardson Assessment Area						
Performance Measurement	Performance Factor	Interim Annual Goals (Percentage of AA Mortgage Originations)			Aggregate of Annual Percentage Goal	Performance Rating
		2019	2020	2021		
Richardson AA Low- and Moderate- Income mortgage originations as a percentage of total Richardson AA mortgage originations	LMI Geographies	12%	12%	12%	36%	Satisfactory
		17%	17%	17%	51%	Outstanding
<i>Actual Performance</i>		<i>27%</i>	<i>23%</i>	<i>24%</i>	<i>74%</i>	<i>Outstanding</i>

The bank exceeded the Satisfactory annual percentage goals for LMI Borrowers in the Richardson AA culminating in a total Aggregate of Annual Percentage Goal of 29.1 percent. During the evaluation period 22 mortgage originations were extended to LMI borrowers. The aggregate dollar amount of lending to LMI borrowers was \$3.33 million.

Goal #1 Low- and Moderate-Income Mortgage Lending Richardson Assessment Area						
Performance Measurement	Performance Factor	Interim Annual Goals (Percentage of AA Mortgage Originations)			Aggregate of Annual Percentage Goal *	Performance Rating
		2019	2020	2021		
Richardson AA Low- and Moderate-Income mortgage originations as a percentage of total Richardson AA mortgage originations	LMI Borrowers	6%	6%	6%	18%	Satisfactory
		12%	12%	12%	36%	Outstanding
<b>Actual Performance</b>		<b>21.1%</b>	<b>4.3%</b>	<b>3.7%</b>	<b>29.1%</b>	<b>Satisfactory</b>
* The Plan provides that if LMI Mortgage Lending performance does not meet the annual interim goals during a multi-year review period, the bank may be assigned a satisfactory rating for the category if performance in other years within the period make up the shortfall.						

### Goal 2: Community Development Financing

CD lending in the Richardson AA exceeded the Outstanding annual percentage goals for 2020 and 2021. The bank leveraged SBA PPP loan originations to meet CD lending goals in the Richardson AA. The Aggregate of Annual Percentage Goal totaled 10.87 percent. Moreover, the aggregate amount of the originations over the three-year period was \$4.5 million, which significantly exceeded the minimum commitment goal of \$1 million for the five-year term of the Strategic Plan period.

Although the bank exceeded CD lending goals in the Richardson AA, it must be noted that the bank did no CD lending in 2019. However, in that year the bank commenced work with a local non-profit agency for an unsecured line of credit request to support its development of low-income housing. The facility was funded in 2022.

Goal #2 Community Development Lending Richardson Assessment Area					
Performance Measurement	Interim Annual Goals (Percentage of Total Gross Loans and Leases)			Aggregate of Annual Percentage Goal *	Performance Rating
	2019	2020	2021		
New CD Loan Originations as a percent of Total Gross Loans and Leases	0.60%	0.60%	0.70%	1.90%	Satisfactory
	1.20%	1.20%	1.40%	3.80%	Outstanding
<b>Actual Performance</b>	<b>0.00%</b>	<b>3.43%</b>	<b>7.44%</b>	<b>10.87%</b>	<b>Outstanding</b>
* The Plan provides that if Community Development Lending does not meet the annual interim goals during a multi-year review period, the bank may be assigned a satisfactory rating for the category if performance in other years within the period make up the shortfall.					

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

### Goal 3: Community Development Investments

The bank’s performance for CD Investments in the Richardson AA was satisfactory based on performance context. The bank was unable to purchase certificates of deposit in CDFIs in the Richardson AA. As a result, CD investments consisted of donations totaling \$2,000. The donations supported a non-profit organization founded for the express purpose of providing faith-based community and education services to individuals and families in need.

Unlike the Whittier AA, the bank found there were only three FDIC-insured deposit-taking CDFIs in Texas and only one has a market that includes the bank’s Richardson AA. While management made a number of attempts to purchase certificates of deposits from the CDFI in the Richardson AA, they were told that the CDFI was not accepting retail deposits from institutions. Management then sought out a CDFI credit union, but was told retail deposits from non-members were not accepted. As an offset for the lack of opportunity with local CDFIs, the bank made an initial certificate deposit purchase in a local MFI for \$240,000. At maturity, the bank renewed the certificate of deposit for another period, ensuring the MFI has sustained access to working capital to fund an ongoing response to needs in the Texas market. This amount exceeded the \$200,000 minimum commitment set for the AA for the entire 5-year term of the plan.

Goal #3 Community Development Investments Richardson Assessment Area					
Performance Measurement	Interim Annual Goals (Percentage of Tier 1 Capital)			Aggregate of Annual Percentage Goal *	Performance Rating
	2019	2020	2021		
New community development investments as a percent of Tier 1 Capital	1.0%	1.2%	1.4%	3.6%	Satisfactory
Aggregate of new and outstanding prior period community development investments as a percent of Tier 1 Capital	2.0%	2.0%	2.0%	6.0%	Outstanding
<i>Actual Performance</i>	<i>0.0%</i>	<i>0.01</i>	<i>0.0%</i>	<i>0.01%</i>	<i>Satisfactory</i> based on Performance Context
* The Plan provides that if Community Development Investments do not meet the annual interim goals during a multi-year review period, the bank may be assigned a satisfactory rating for the category if performance in other years in the period make up the shortfall on a combined AA basis.					

#### Goal 4: Community Development Service

The bank exceeded the Satisfactory annual percentage goals for CD Services in the Richardson AA for 2020 and 2021, which is commendable given the limited branch resources. Branch personnel provided financial advisory services, and helped financially-strained LMI individuals and small businesses navigate through the financial resources made available during the COVID-19 pandemic period. Impacted people were ultimately referred to government-sponsored loan products, such as PPP loans, that provided a means to get immediate financial assistance during a period of heightened uncertainty. In 2021 branch staff successfully processed a substantial increase of PPP loans, a total of 188 loans up from 35 in 2020.

Goal #4 Community Development Services Richardson Assessment Area						
Performance Measurement		Interim Annual Goals (Hours)			Aggregate of Annual Hours Goal *	Performance Rating
		2019	2020	2021		
Category I Service	Services such as (1) Membership on Board or Committees; (2) Volunteered Bank personnel to provide financial-related Education.	6	8	9	23	Satisfactory
		20	20	24	64	Outstanding
<i>Actual Performance</i>						
<b>Category I Service:</b> Services such as (1) Membership on Board or Committees; (2) Volunteered Bank personnel to provide financial-related Education.		0	0	0		<i>Satisfactory</i>

<b>Financial-related borrower assistance in response to the Pandemic:</b> Services that assist residents experiencing financial hardship, including LMI homeowners and nonprofits, i.e., loan forbearance, loan workouts, and debt restructuring.	NA	50	10		
<b>Total</b>	0	50	10	60	
* The Plan provides that if Community Development Services performance does not meet the annual interim goals during a multi-year review period, the bank may be assigned a satisfactory rating for the category if performance in other years within the period make up the shortfall.					

### Goal 5: Activities that Support Minority-Owned Financial Institutions

The bank exceeded the Satisfactory annual percentage goals for investments in MFIs in 2020 and 2021. While MFIs are abundant in the Whittier AA, there are only two MFIs in the Richardson AA. During the evaluation period, the bank placed a total of \$480,000 in deposits in MFIs, far exceeding the \$200,000 minimum commitment for the 5-year term of the Strategic Plan.

<b>Goal #5 Deposits in Minority-owned Financial Institutions Richardson Assessment Area</b>					
<b>Performance Measurement</b>	<b>Interim Annual Goals (Percentage of Tier 1 Capital)</b>			<b>Aggregate of Annual Percentage Goal **</b>	<b>Performance Rating</b>
	<b>2019</b>	<b>2020</b>	<b>2021</b>		
New certificates of deposits in MFIs* in the bank's AA as a percentage of Tier 1 Capital.	0.40%	0.40%	0.60%	1.40%	Satisfactory
Aggregate of new and outstanding prior period certificates of deposits in MFI* in the bank's AA as a percentage of Tier 1 Capital.	1.20%	1.20%	1.40%	3.80%	Outstanding
<b>Actual Performance</b>					
New certificates of deposits in MFIs* in the bank's AA as a percentage of Tier 1 Capital. (Excludes outstanding prior period certificates of deposit.)	0.00%	1.36%	1.14%	2.50%	<i>Satisfactory</i>
* Excludes any MFI considered under the Community Development Investment goals.					
** The Plan provides that if MFI deposits do not meet the annual interim goals during a multi-year review period, the bank may be assigned a satisfactory rating for the category if performance in other years within the period make up the shortfall.					

### Response to Complaints

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

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, loan products considered, and affiliate activities that were reviewed. The table also reflects the MSAs and non-MSAs that received comprehensive examination review.

<b>Time Period Reviewed:</b>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Home mortgage loans Community development loans, investments and donations, and services	
<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 Examination</b>	<b>Other Information</b>
<b>State of California</b>		
Whittier, CA AA	Full-scope	AA is comprised of all of Orange County, the large southwestern part of Los Angeles County, and small western portions of Riverside and San Bernardino Counties.
<b>State of Texas</b>		
Richardson, TX AA	Full-scope	AA is comprised of the Dallas-Fort Worth-Arlington, TX MSA.



# Appendix B - Summary of State Ratings

State Name	State Rating
California	Satisfactory
Texas	Satisfactory

## 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 MA/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.

**Community Development:** 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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**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.

**MMSA (state):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) 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 One 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.