



PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Axos Bank
Charter Number: 716456

4350 La Jolla Village Drive, Suite 140
San Diego, CA 92122

Office of the Comptroller of the Currency

1551 North Tustin Ave., 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**.

The following table indicates the performance level of Axos Bank with respect to the Lending, Investment, and Service Tests:

Performance Levels	Axos Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Noncompliance			

* The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- An adequate level of lending activity in the San Diego-Carlsbad MSA (Metropolitan Statistical Area) and a good level of lending in the Las Vegas-Henderson-Paradise MSA.
- Adequate geographic distribution of home mortgage loans in the San Diego-Carlsbad MSA and the Las Vegas-Henderson-Paradise MSA.
- Excellent geographic distribution of small loans to businesses in the San Diego-Carlsbad MSA and good geographic distribution of small loans to businesses in the Las Vegas-Henderson-Paradise MSA.
- Good borrower distribution of small loans to businesses in the San Diego-Carlsbad MSA and excellent borrower distribution of small loans to businesses in the Las Vegas-Henderson-Paradise MSA.
- An adequate level of qualified community development (CD) loans in the San Diego-Carlsbad MSA and the Las Vegas-Henderson-Paradise MSA.
- An adequate level of qualified investments and donations in the San Diego-Carlsbad MSA and the Las Vegas-Henderson-Paradise MSA.
- Reasonable accessibility to the bank’s branch and retail services in the San Diego-Carlsbad MSA and the Las Vegas-Henderson-Paradise MSA.
- An adequate level of CD services in the San Diego-Carlsbad MSA.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family

households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

Rated Area: A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state 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.

Description of Institution

Axos Bank (Axos), formerly known as Bofl Federal Bank, is a non-traditional savings bank headquartered in San Diego, California. Axos Bank is a wholly-owned subsidiary of Axos Financial Inc. The bank opened for business on July 4, 2000. On September 12, 2018, the holding company changed its name from Bofl Holding, Inc. to Axos Financial, Inc. Subsequently on October 1, 2018, the bank's name was changed from Bofl Federal Bank to Axos Bank.

As of the date of the evaluation, the bank has a total of three branches, which are located in California, Nevada, and Ohio. The main branch is located in San Diego, California. On August 31, 2015 (prior to this review period), the bank opened a branch in Reno, Nevada. However, management relocated the branch to Las Vegas, Nevada on March 1, 2017. In November 2018, the bank acquired certain assets and liabilities of Nationwide Bank, which included one branch located in Columbus, Ohio and approximately \$2.4 billion in deposits. In 2019 the bank acquired approximately \$250 million in deposits from Modern Woodmen Bank (MWABank) located in Rock Island, IL.

In addition, to the branches noted above, the bank also operates 22 automated teller machines (ATMs). The only full-service ATM is located at the main branch in San Diego, California. The remaining ATMs are cash dispensing ATMs only and are located as follows: one in Scottsdale, Arizona; one in Sacramento, California; one in Gainesville, Florida; three in Des Moines, Iowa; one in Raleigh, North Carolina; one in Harrisburg, Pennsylvania; one in Harleysville, Pennsylvania; and one in San Antonio, Texas. The remaining 11 ATMs are located in Ohio, which includes seven in Columbus, one in Canton, one in Grandview Heights, one in Grove City, and one in Lewis Center.

Axos focuses on serving customers' banking needs primarily through the internet. The bank distributes its deposit products through its branches, ATM, mobile access, and the internet. The bank distributes its loan products through retail, correspondent, and wholesale channels. Axos markets its products using the following brand names: Bank of Internet USA, Bofl Advisor, Apartment Bank, UFB Direct, Annuitants Federal Bank, Virtus Bank, NetBank, and Bank X. During the review period, the bank completed its fourth season of the H&R Block Emerald Advance Loan product, which consisted of funding 1.5 million loans totaling \$1.4 billion. The Emerald loan program offers low dollar value lines of credit that require full repayment before granting renewal of the line. The bank offers these unsecured consumer loans seasonally from November to January each year.

Since the previous CRA examination, Axos's total assets increased from \$7.7 billion as of March 31, 2016, to \$9.8 billion as of December 31, 2018. As of December 31, 2018, the bank reported total deposits of \$8.4 billion, total loans of \$9.1 billion, and tier one capital of \$955.6 million.

Axos is primarily a residential mortgage lender, with a significant number of multifamily residential mortgages. The ratio of net loans to total assets is 92 percent. The bank's portfolio consists of the following: 1-4 family residential 54.05 percent, multifamily 21.01 percent, non-farm non-residential 7.61 percent, construction and development 3.82 percent, commercial and industrial 8.44 percent, consumer 3.02 percent, and lease financing 2.05 percent.

There are no legal, financial, or other factors that impede the bank's ability to help meet the credit needs of its AAs. Axos received a "Satisfactory" rating in its previous CRA evaluation dated June 06, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We reviewed home mortgage loans and small loans to businesses for the period beginning January 1, 2016 through December 31, 2018. However, for the Las Vegas-Henderson-Paradise MSA, we reviewed loans only for the 2017-2018 evaluation period and for the Reno-Sparks MSA, we reviewed loans only for the 2016 evaluation period. See State of Nevada Lending Test for additional details. Axos Bank does not originate small farm loans. We reviewed CD loans, investments, and services for the period beginning June 7, 2016 through December 31, 2018.

For the lending test, an analysis was conducted for the year of 2016 using the 2010 U.S. Census data. Lending data for the years 2017-2018 was analyzed separately using the 2015 American Community Survey (ACS) data that applies to these years. Specifically, comparative data was different for the two review periods due to changes in certain census tract codes and definitions. Between 2016 and 2017 there were also changes to the median family income values.

Data Integrity

Prior to this evaluation, we tested the accuracy of Axos's publicly filed information for home mortgage loans and small loans to businesses. The data we reviewed was collected and reported by the bank during the evaluation period. The testing indicated no substantive inaccuracies in the HMDA data. However, the reported CRA loan data contained significant errors. The bank subsequently corrected the errors and follow-up reviews indicated there were no substantive inaccuracies. In addition, the bank refiled the 2018 CRA loan application register. Consequently, the CRA loan data we reviewed for this analysis is substantially accurate. Additionally, CD investments, loans, and services made or rendered during the evaluation period were reviewed to determine their eligibility for consideration. We found numerous loans, investments, and donations, as well as some services that did not qualify as community development. We included in this review only those activities found to meet the definition of community development.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of assessment areas (AAs) within that state was selected for full-scope reviews. Refer to the "Scope" section under each State Rating section (as applicable) for details regarding how the areas were selected. Furthermore, the evaluation includes a review of all AAs where the branches were open at least six months during the evaluation period. Consequently, this evaluation includes a full-scope analysis of the bank's CRA performance in the San Diego-Carlsbad MSA and the Las Vegas-Henderson-Paradise MSA. We also performed a limited-scope review of the Reno-Sparks MSA, since it was open 14 months during the evaluation period. This evaluation does not include an analysis of the bank's performance relative to its recent acquisitions, including the acquisition of Nationwide Bank.

Ratings

Axos is a non-traditional bank that gathers deposits and offers loans throughout the United States. However, during the evaluation period, the bank also operated traditional branches in the state of California and the state of Nevada. As a result, the ratings are based on the bank's CRA performance in the San Diego-Carlsbad MSA, the Las Vegas-Henderson-Paradise MSA, and the Reno-Sparks MSA. We also considered lending performance in areas outside the AAs where the bank has originated or purchased a substantial portion of its loans and/or gathered a substantial portion of its deposits. We selected six states (Arizona, California, Florida, New York, Ohio, and Texas) as a representative sample of the bank's entire marketplace. In analyzing the bank's overall performance, we placed the most weight first on performance in the state of California, second on performance in the state of Nevada, and third on performance in the selected six states. Refer to the "Scope" section under each State Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

When evaluating the bank's performance under the lending test, we placed substantially greater weight on home mortgage loans than on small loans to businesses because of the identified community credit need for home mortgage loans in all of the bank's AAs and in the supplemental areas. In addition, we placed more weight on home mortgage loans in the AAs and the supplemental areas because this is the bank's business focus, which is also evident in the higher number and dollar volume of these loans. Home mortgage loans represent 62 percent of the number and 95 percent of the dollar volume of reportable loans. In addition, we placed more weight on the borrower distribution than on geographic distribution of loans. This is due to the gentrification occurring in low- and moderate-income geographies in the bank's AAs. Unless stated elsewhere, we placed more weight on comparison to the demographics than on comparison to the aggregate.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] 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 California: Satisfactory

The lending test is rated: Low Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: High Satisfactory

The major factors that support this rating include:

- Adequate lending activity in the San Diego-Carlsbad MSA.
- Adequate geographic distribution of home mortgage loans in LMI CTs.
- Excellent geographic distribution of small loans to businesses in LMI CTs.
- Good borrower distribution of small loans to businesses with gross annual revenues of \$1 million or less.
- An adequate level of qualified investments and donations in the San Diego-Carlsbad MSA.
- Reasonable accessibility to the bank's retail services.
- An adequate level of CD services in the San Diego-Carlsbad MSA.

Description of Institution's Operations in California

The bank operates one branch and one full-service ATM in the state of California. The branch and full-service ATM are located in the San Diego-Carlsbad MSA. The bank also operates a cash-dispensing ATM in Sacramento, California. Just over 80 percent of the bank's deposits are gathered from the San Diego-Carlsbad MSA. The only other branches we reviewed during this evaluation period are located in the state of Nevada.

Axos is primarily a mortgage lender. The bank originates single family residential mortgage loans and multifamily loans, which include, but are not limited to financing mixed use, student housing, and mobile home parks. The bank distributes its loan products through retail, correspondent, and wholesale channels. Deposit products are distributed through a wide range of retail distribution channels.

The majority of the bank's reportable loans in the states of California and Nevada were originated and/or purchased in the San Diego-Carlsbad MSA, either based on number, dollar volume, or both. For home mortgage loans, 69 percent of the number and 84 percent of the dollar volume was originated in the San Diego-Carlsbad MSA. For small loans to businesses, 47 percent of the number and 62 percent of the dollar volume was originated in the San Diego-

Carlsbad MSA. In addition, just over 80 percent of the deposits from the full scope AAs are gathered from the San Diego-Carlsbad MSA.

Major competitors in the San Diego-Carlsbad MSA include large national institutions such as Wells Fargo, N.A.; JPMorgan Chase Bank, N.A.; Citibank, N.A.; and Bank of America, N.A. Mid-size banks, large community banks such as Banc of California, numerous small community banks, and non-bank lenders also compete for loans in the AA.

Refer to the community profiles for the state of California in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in California

Ratings in the state of California are based entirely on the bank's performance in the San Diego-Carlsbad MSA. However, in determining the overall ratings, we also considered the bank's performance in the state of Nevada since the bank also currently operates a branch in the Las Vegas-Henderson-Paradise MSA and previously operated a branch in the Reno-Sparks MSA. As noted in the "Ratings" section, since Axos is a non-traditional bank that gathers deposits and offers loans throughout the United States, the overall ratings are also based on the bank's CRA performance in areas outside the AA where the bank originated or purchased a substantial portion of its loans and/or gathered a substantial portion of its deposits.

When evaluating the bank's performance under the lending test, we placed greater weight on home mortgage loans than small loans to businesses because of the identified community credit needs for home mortgage loans in the San Diego-Carlsbad MSA. In addition, home mortgage loans represent a substantial portion of total reportable loans in the bank's two AAs. Finally, the bank's performance in California is weighted more heavily than performance in Nevada and the other supplemental AAs since 69 percent of the number and 84 percent of the dollar volume of home mortgage loans was originated or purchased in the bank's San Diego-Carlsbad AA. In addition, 62 percent of the dollar volume of small loans to businesses was originated/purchased in the San Diego-Carlsbad AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in California is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the San Diego-Carlsbad MSA is adequate.

Lending Activity

Based on the facts and data in Table 1 Lending Volume in the state of California section of appendix D and performance context considerations, we concluded Axos's home mortgage and small business lending levels reflect adequate responsiveness to the credit needs of the San Diego-Carlsbad MSA.

The bank originated/purchased 677 home mortgage loans totaling \$509.7 million and 311 small loans to businesses totaling \$20.1 million in this AA during the 2016 through 2018 evaluation period.

The bank has a deposit market share in the AA of 7.17 percent with a market rank of 5th out of 53 deposit-taking institutions (9th percentile). The four largest institutions in this AA hold 66 percent of the market share.

For home mortgage lending, the bank has a market share of 0.15 percent with a market rank of 106th out of 567 home purchase lenders (19th percentile); 0.16 percent with a market rank of 99th out of 560 home refinance lenders (18th percentile); and 2.06 percent with a market rank of 10th out of 59 multifamily lenders (17th percentile). The market for home mortgage loans is very competitive and consists of national and local lenders of different sizes. Four of the largest lenders captured 21 percent of the home purchase loan market; five of the largest lenders captured 27 percent of the home refinance loan market; and one lender captured 36 percent of the multifamily loan market.

For small business loans, the bank has a market share of 0.13 percent with a market rank of 42nd out of 157 small business lenders (27th percentile). The market for small business lending is also very competitive and consists of national and local lenders of different sizes. Five lenders captured 66 percent of the small business loan market.

Distribution of Loans by Income Level of the Geography

Overall, geographic distribution of loans is adequate. Due to the significance of home mortgage loans, the excellent geographic distribution of small business loans did not materially impact the adequate geographic distribution of home mortgage loans.

Home Mortgage Loans

Based on the data in Tables O in the state of California section of appendix D, we determined the geographic distribution of the bank's home mortgage loan originations/purchases in the San Diego-Carlsbad MSA during the 2016 through 2018 evaluation period is adequate.

During the 2016 evaluation period, the distribution of the bank's home mortgage lending in low- and moderate-income geographies was poor. The proportion of the bank's loans in low-income CTs was significantly below the proportion of owner-occupied housing units. The proportion of the bank's loans in moderate-income CTs was well below the proportion of owner-occupied housing units. In addition, the proportion of the bank's loans in both low- and moderate-income CTs was well below the aggregate.

Distribution of home mortgage loans during the 2017-2018 evaluation period was stronger and was good. The proportion of the bank's loans in low-income CTs significantly exceeded the proportion of owner-occupied housing units in low-income CTs. The proportion of the bank's loans in moderate-income CTs was near to the proportion of owner-occupied housing units and was good. The proportion of the bank's loans exceeded the aggregate in low-income CTs, but was below the aggregate in moderate-income CTs.

Small Loans to Businesses

Based on facts and data in Tables Q in the state of California section of appendix D, we concluded the geographic distribution of the bank's originations/purchases of small loans to businesses in the San Diego-Carlsbad MSA is excellent.

During the 2016 evaluation period, the distribution of the bank's small loans to businesses was excellent. The proportion of small business loans in low-income geographies was near to the proportion of businesses in these CTs. The proportion of loans in moderate-income CTs, exceeded the proportion of businesses in moderate-income CTs. In addition, the proportion of the bank's small loans to businesses exceeded the aggregate in both low- and moderate-income CTs.

Distribution of small loans to businesses during the 2017-2018 evaluation period was slightly stronger and was excellent. The proportion of the bank's loans exceeded the proportion of businesses in both low- and moderate-income CTs. In addition, the proportion of small loans to businesses exceeded the aggregate in both low- and moderate-income CTs.

Lending Gap Analysis

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

Inside/Outside Ratio

For the combined three-year evaluation period, the bank originated or purchased an adequate percentage of reportable loan products in its AAs. (The bank's inside/outside ratio is calculated on a bank-wide basis.) Based on number of loans, Axos originated or purchased nine percent of its home mortgage loans and three percent of its small loans to businesses in its AAs during the evaluation period. Based on dollar volume of loans, the bank originated eight percent of its home mortgage loans and four percent of its small loans to businesses in its AAs during the evaluation period. While a substantial majority of the bank's lending was originated or purchased outside the bank's AAs, this is attributed to the fact that Axos is primarily an internet bank, which makes loans throughout the United States.

Distribution of Loans by Income Level of the Borrower

Overall, the borrower distribution of loans is poor. Due to the significance of home mortgage loans, the good borrower distribution of small business loans did not materially impact the bank's poor borrower distribution of home mortgage loans.

Home Mortgage Loans

Based on the facts and data in Tables P in the state of California section of appendix D, we concluded the borrower distribution of the bank's home mortgage loan originations/purchases is poor. In concluding on the bank's performance, we considered performance context and gave more weight to the aggregate. In particular, we considered the lack of affordable housing stock in the San Diego-Carlsbad MSA. However, we also considered that 37 percent of the home mortgage loans the bank originated/ purchased were home refinance and home improvement loans.

The distribution of the bank's home mortgage lending during the 2016 evaluation period was poor after considering performance context factors. The proportion of home mortgage loans to both low- and moderate-income borrowers was significantly below the proportion of low- and moderate-income families and was very poor. In addition, the proportion of loans to both low- and moderate-income borrowers was well below the 2016 aggregate and was poor.

The bank's lending performance during the 2017-2018 evaluation period was similar and was poor. The proportion of home mortgage loans to both low- and moderate-income borrowers was significantly below the proportion of low- and moderate-income families and was very poor. In addition, the proportion of loans to both low- and moderate-income borrowers was well below the 2017 aggregate and was poor.

Small Loans to Businesses

Based on the facts and data in Tables R in the state of California section of appendix C, the borrower distribution of the bank's small loans to businesses with gross annual revenues of \$1 million or less is good.

During the 2016 evaluation period, the distribution of the bank's small loans to businesses was good. The proportion of loans was near to the proportion of businesses with gross annual revenues of \$1 million or less. In addition, the proportion of these loans exceeded the 2016 aggregate

The bank's performance during the 2017-2018 evaluation period was similar, and was good. The proportion of loans was near to the proportion of businesses that were small; and the proportion of loans exceeded the 2017 aggregate.

Community Development Lending

Refer to Table 1 Lending Volume in the state of California section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

Axos's community development lending in the San Diego-Carlsbad MSA is adequate and had a neutral impact on the bank's overall lending performance in the state of California. During the evaluation period, the bank originated 30 CD loans totaling \$33.5 million in the San Diego-Carlsbad MSA. Although the loans were not innovative or complex, they were responsive to a critical need in the AA. All of the bank's loans supported affordable housing.

Statewide CD Loan

In addition, we gave positive consideration to a \$75 million loan to a Community Development Financial Institution (CDFI) whose purpose is to originate loans to low-income individuals and in low-income communities in the state of California, including the bank's San Diego-Carlsbad AA.

CD Loans outside the Bank's AA

The bank also made 148 CD loans totaling \$126.3 million in the Los Angeles-Anaheim-Riverside CMSA (Consolidated MSA). None of the loans had the potential to benefit the bank's AA. All the loans helped provide affordable housing to LMI individuals. CD lending outside the bank's AA did not significantly impact the bank's overall lending test rating.

Product Innovation and Flexibility

Loan products the bank offered during the review period were not innovative. However, the bank did offer a flexible consumer loan product which provided small dollar short-term lines of credit to individuals who might not otherwise be able to obtain small loans elsewhere. These lines of credit were a good alternative to payday lending.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in California is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the San Diego-Carlsbad MSA is adequate. Investments in the broader statewide and regional area that include the bank's AAs further support the overall conclusion. Refer to Table 14 in the state of California section of appendix D for the facts and data used to evaluate the bank's level of qualified investments

During the evaluation period, Axos provided 56 qualified investments and donations totaling \$26.4 million that benefited the San Diego-Carlsbad MSA. The investments represent 3.4 percent of allocated tier one capital. Qualified investments include 12 prior period investments totaling \$15.6 million, which represents more than half (59 percent) of the total investment dollars. In arriving at our conclusion, we took into consideration the bank's responsiveness to the CD needs in the San Diego-Carlsbad MSA. We determined these needs after meeting with community groups and assessing the needs of the AA. In response to a critical need in the bank's AA, the bank provided nine investments totaling \$9.7 million, which helped provide affordable housing in the San Diego-Carlsbad MSA. None of the investments the bank provided were innovative or complex. Some examples of the investments are as follows:

- A \$3.6 million investment in a low-income housing tax credit (LIHTC) which helped provide affordable housing for LMI individuals in the bank's AA.
- A \$5 million investment in a LIHTC which will help provide affordable housing to LMI families in a low-income area within the bank's AA.

Statewide, Regional, and Areas Outside the Bank's AA

We also gave the bank positive consideration for the level of statewide and regional CD investments. During the evaluation period, the bank originated seven qualified investments totaling \$14.1 million in regional investments. These investments also have the potential to benefit the bank's AAs.

In addition, we gave the bank consideration for deposits totaling \$996 thousand in minority depository institutions outside the bank's AA. Finally, we gave the bank credit for a municipal bond totaling \$715 thousand which benefits the Los Angeles-Anaheim-Riverside CMSA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in California is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the San Diego-Carlsbad MSA is good.

Retail Banking Services

Refer to Table 15 in the state of California section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Axos's branch location is reasonably accessible to geographies and individuals of different income levels in the San Diego-Carlsbad MSA. Furthermore, Axos's alternate delivery systems enable customers to open accounts, make deposits, withdraw funds, and make loan payments online or via a mobile application. The branch business hours are Monday through Friday 9:00 AM to 5:00 PM. The bank also has a full-service 24-hour ATM located at the branch.

Alternate Delivery Systems

Alternate delivery systems offer reasonable accessibility to the bank's products and services. Axos is primarily an internet bank with the majority of services offered nationwide via the internet and mobile banking applications. Through the internet, customers can establish a deposit relationship, apply for lending products, transfer funds, conduct bill payment transactions, have the ability to deposit checks from home or office with "MyDeposit," and conduct free person-to-person fund transfers with "Popmoney." The bank offers free mobile banking with many of the same features available through online banking, including free "Mobile Deposit," which allows customers to deposit checks through their mobile phone or tablet. ATM service fees are reimbursed for most U.S. domestic ATMs depending upon the type of account held at the bank or products used. Additionally, Axos provides 24-hour automated telephone banking services. Internet and mobile banking services are accessible to anyone who has access to a computer or a compatible mobile phone device. Management provided data that shows the alternate delivery systems provide access to LMI individuals outside of its branch location, with approximately 41 percent of deposit accounts in LMI geographies. The data also shows that approximately 55 percent of LMI customers are

enrolled in online banking; however, this excludes retirement accounts and certificates of deposit. If these accounts are included, the percentage of online enrollment is much lower at approximately 8 percent.

Axos offers products with features that benefit LMI and under-banked individuals. The bank provides payroll debit cards for various employers in a variety of industries and companies. Employees who do not have bank accounts are able to access their wages with the payroll debit cards and avoid paying check-cashing fees. This also provides access to online purchases, bill payment, and other financial services and offers protection against unauthorized usage. Additionally, the bank offers a “second chance” bank account for customers who are unable to obtain checking or savings accounts at other institutions due to marginal ChexSystems history. Consumers then have increased access to financial services with potentially lower cost and may qualify to upgrade to a regular checking or savings account after a period of responsible usage. Management provided data demonstrating that approximately 49 percent of payroll/prepaid cards issued during the evaluation period were issued to individuals in LMI communities.

Community Development Services

Axos provided an adequate level of CD services that are responsive to the community development needs in the AA. During the evaluation period, 53 employees provided 566 hours of service to organizations that benefit LMI individuals in the AA through community services, economic development, and affordable housing. This is a decline from the previous evaluation period, when the bank provided 1,248 hours. Management stated this was due to fewer opportunities to volunteer with one of the organizations providing financial literacy to students. Examples of the bank’s CD services include:

- Forty-two bank employees volunteered to be instructors to provide a “real world” financial education to students from LMI households in the AA.
- Nine bank employees volunteered to provide financial literacy education through a non-profit organization that works to reach San Diego’s disadvantaged youth.
- A bank officer serves on two committees for a non-profit CD organization that helps promote financial literacy and neighborhood revitalization.
- A senior executive officer serves as a board member and treasurer for a non-profit organization that provides community services to LMI elderly individuals.

State Rating

State of Nevada

CRA Rating for Nevada: Satisfactory

The lending test is rated: Low Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: Low Satisfactory

The major factors that support this rating include:

- An adequate level of lending activity in the Las Vegas-Henderson-Paradise MSA.
- Adequate geographic distribution of home mortgage loans in LMI CTs.
- Good geographic distribution of small loans to businesses in LMI CTs.
- Excellent borrower distribution of small loans to businesses with gross annual revenues of \$1 million or less.
- An adequate level of CD loans in the Las Vegas-Henderson-Paradise MSA.
- A good level of qualified investments and donations in the Las Vegas-Henderson-Paradise MSA.
- Reasonable accessibility to the bank's branch and retail services.

Description of Institution's Operations in Nevada

The bank operates one branch and no ATMs in the state Nevada. The branch is located in the Las Vegas-Henderson-Paradise MSA. The bank originally operated a branch in the Reno-Sparks MSA. However, this branch was closed February 28, 2017 and relocated to the Las Vegas-Henderson-Paradise MSA on March 1, 2017.

Based on a review of total reportable loans, 53 percent of the number and 38 percent of the dollar volume of small loans to businesses was originated in this AA. In addition, almost 20 percent of the bank's deposits from the full-scope AAs was gathered from the Las Vegas-Henderson-Paradise MSA.

Major competitors in the Las Vegas-Henderson-Paradise MSA include large national institutions such as U.S. Bank, N.A.; Wells Fargo Bank, N.A.; and JPMorgan Chase, N.A. There are also several mid-size and community banks and a number of non-bank lenders that compete for loans in this AA.

Scope of Evaluation in Nevada

This review includes a full-scope review of the bank's performance in the Las Vegas-Henderson-Paradise MSA and a limited-scope review of the bank's performance in the Reno-Sparks MSA. While we considered that the bank did not have a branch in the Las Vegas-Henderson-Paradise MSA during a portion of the review period, we also considered that the bank is primarily an internet bank, which served numerous areas throughout the United States during the review period. Ratings in the state of Nevada are based primarily on the bank's performance in the Las Vegas-Henderson-Paradise MSA. However, we also considered the bank's performance in the Reno-Sparks MSA. See the "Ratings" section for additional information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEVADA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance under the lending test in the Las Vegas-Henderson-Paradise MSA and a limited-scope review of the Reno-Sparks MSA, the bank's lending performance is adequate.

Lending Activity

Based on the facts and data in Table 1 Lending Volume in the state of Nevada section of appendix D and performance context considerations, we concluded Axos's home mortgage and small business lending activity reflects adequate responsiveness to the credit needs of the Las Vegas-Henderson-Paradise MSA.

The bank originated or purchased 304 home mortgage loans totaling \$98 million and 296 small loans to businesses totaling \$12 million in this AA during the 2016 through 2018 evaluation period.

The bank has a deposit market share in the AA of 0.61 percent with a market rank of 11th out of 40 deposit-taking institutions (28th percentile). One financial institution holds 74 percent of the market share.

For home mortgage lending, the bank has a market share of 0.09 percent with a market rank of 108th out of 394 home purchase lenders (27th percentile); 0.17 percent with a market rank of 82nd out of 328 home refinance lenders (25th percentile); and 0.70 percent with a market rank of 33rd out of 143 multifamily lenders (23rd percentile). The market for home mortgage loans is very competitive and consists of national and local lenders of different sizes. Four of the largest lenders captured 25 percent of the home purchase loan market; four of the largest lenders captured 30 percent of the home refinance loan market; and three of the largest lenders captured 32 percent of the multifamily loan market.

For small business loans, the bank has a market share of 0.25 percent with a market rank of 23rd out of 153 small business lenders (15th percentile). The market for small business lending is also very competitive and consists of national and local lenders of different sizes. Three lenders captured 15 percent of the small business loan market.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Las Vegas-Henderson-Paradise MSA is adequate. Due to the significance of home mortgage loans, the good geographic distribution of small business loans did not materially impact the adequate geographic distribution of home mortgage loans.

Home Mortgage Loans

Based on the facts and data in Tables O in the state of Nevada section of appendix D, we concluded the geographic distribution of the bank's home mortgage loan originations/purchases during the 2017-2018 evaluation period is adequate. We did not analyze the bank's lending in the Las Vegas-Henderson-Paradise MSA since the bank did not have an office in this AA during the 2016 evaluation period.

The bank's performance during the 2017-2018 evaluation period was adequate. The proportion of the bank's loans in low-income CTs was below the proportion of owner-occupied housing units, but was adequate. However, the proportion of the bank's loans in moderate income CTs was significantly below the proportion of owner-occupied housing units and was very poor. The proportion of the bank's loans exceeded the aggregate in low-income CTs and was excellent. The proportion of the bank's loans was well below the aggregate in moderate-income CTs and was poor.

Small Loans to Businesses

Based on the facts and data in Table Q in the state of Nevada section in appendix C, we concluded the geographic distribution of the bank's origination/purchase of small loans to businesses during the 2016 through 2018 evaluation period is good.

During the 2016 evaluation period, Axos's distribution of small loans to businesses in low- and moderate-income geographies was adequate. The bank did not make any small loans to businesses in low-income CTs. However, the proportion of small loans to businesses in moderate-income CTs was near to the proportion of businesses in moderate-income CTs and exceeded the aggregate in these CTs, which was excellent.

The bank's performance during the 2017-2018 evaluation period was stronger and was good. The proportion of small loans to businesses exceeded the proportion of small businesses in low-income CTs, and the proportion of these loans was near to the proportion of businesses in moderate-income CTs. In addition, the proportion of the bank's loans exceeded the aggregate in both low- and moderate-income CTs.

Lending Gap Analysis

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

Inside/Outside Ratio

For the combined three-year evaluation period, the bank originated or purchased an adequate percentage of reportable loan products in its AAs. (The bank's inside/outside ratio is calculated on a bank-wide basis.) Based on number of loans, Axos originated or purchased nine percent of its home mortgage loans and three percent of its small loans to businesses in its AAs during the evaluation period. Based on dollar volume of loans, the bank originated eight percent of its home mortgage loans and four percent of its small loans to businesses in its AAs during the evaluation period. While a substantial majority of the bank's lending was originated or purchased outside the bank's AAs, this is attributed to the fact that Axos is primarily an internet bank, which makes loans throughout the United States.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution in the Las Vegas-Henderson-Paradise MSA is poor. Due to the significance of home mortgage loans, the excellent distribution of small business loans did not materially impact the poor distribution of home mortgage loans.

Home Mortgage Loans

Based on the facts and data in Tables P in the state of Nevada section of appendix D, we concluded the borrower distribution of the bank's home mortgage loan originations/purchases is poor. In concluding on the bank's performance, we considered performance context. Specifically, we considered that the bank did not have a branch in the Las Vegas-Henderson-Paradise MSA until 2017, as such, we did not evaluate 2016 lending performance. However, we also considered that the bank originates a substantial portion of its loans through the internet. In addition, 35 percent of the loans the bank originated in the AA consists of home improvement and home refinance loans.

The bank's lending performance during the 2017-2018 evaluation period is poor, after considering performance context factors. The proportion of home mortgage loans to low-income borrowers was significantly below the proportion of low-income families. The proportion of loans to moderate-income borrowers was well below the proportion of moderate-income families. The proportion of home mortgage loans to low-income borrowers was near to the aggregate and the proportion of these loans to moderate-income borrowers was well below the aggregate.

Small Loans to Businesses

Based on the facts and data in Table R in the state of Nevada section of appendix D the bank's distribution of originated/purchased small loans to businesses is excellent.

During the 2017-2018 evaluation period, the distribution of small business loans to businesses with gross annual revenues of \$1 million or less during the 2017-2018 performance was excellent. The proportion of small loans to businesses exceeded both the proportion of small businesses and the 2017 aggregate.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Nevada section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

Axos's community development lending in the Las Vegas-Henderson-Paradise MSA is adequate, and had a neutral impact on the bank's overall lending performance in the state of Nevada. During the evaluation period, the bank originated two CD loans totaling \$6.5 million. Although the loans were not innovative or complex, they were responsive to a critical need in the AA. Both of the bank's loans supported affordable housing.

Product Innovation and Flexibility

Loan products the bank offered during the review period were not innovative. However, the bank did offer a flexible consumer loan product which provided a small dollar short-term line of credit to individuals who might not otherwise be able to obtain small loans elsewhere. These lines of credit were a good alternative to payday lending.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Reno-Sparks MSA is consistent with the bank's overall low satisfactory performance under the lending test in Nevada. See Table 1 in the state of Nevada section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Nevada is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Las Vegas-Henderson-Paradise MSA is good. However, the bank's very poor investment performance in the Reno-Sparks MSA impacted the bank's overall investment performance in the state of Nevada. Refer to Table 14 in the state of Nevada section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, Axos provided four qualified investments and one donation totaling just over \$8 million. The investments and donation represent 4.3 percent of allocated tier one capital. The investments are not innovative or complex. In arriving at our conclusion, we also took into consideration the bank's responsiveness to the CD needs in the Las Vegas-Henderson-Paradise MSA. We determined these needs after meeting with community groups and assessing the needs of the AA. Except for a \$3 thousand donation that provides benefit to

an organization that serves LMI individuals, all of the remaining investment dollars represent investments in four municipal bonds. The municipal bond investments are not specifically responsive to a stated need in the AA. However, they did provide benefit to schools that are primarily attended by LMI children.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Reno-Sparks MSA is significantly weaker than the bank's "High Satisfactory" performance under the investment test in the Las Vegas-Henderson-Paradise MSA. The bank's performance in the Reno-Sparks MSA is very poor as the bank did not make any qualified CD investments in this AA. As a result, the very poor performance in the Reno-Sparks MSA impacted the bank's overall rating in the state of Nevada. Refer to Table 14 in the state of Nevada section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

The bank's performance under the service test in Nevada is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Las Vegas-Henderson-Paradise MSA is adequate. In the Reno-Sparks MSA, where we performed a limited-scope review, the bank's performance is similar.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, Axos's performance in the Las Vegas-Henderson-Paradise MSA is adequate. Overall performance was impacted by the very poor level of CD services.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Axos's branch location is reasonably accessible to geographies and individuals of different income levels in the Las Vegas-Henderson-Paradise MSA. The bank's branch in this AA is located in a middle-income CT, but is accessible to LMI individuals who work in the businesses located in the area. In addition, the bank's alternate delivery systems enable customers to open accounts, make deposits, withdraw funds, and make loan payments online or via a mobile application. The branch business hours are Monday through Friday 9:00 AM to 5:00 PM. There is no onsite ATM.

Alternate Delivery Systems

Axos is primarily an internet bank with the majority of services offered nationwide via the internet and mobile banking applications. Through the internet, customers can establish a deposit relationship, apply for lending products, transfer funds, conduct bill payment transactions, have the ability to deposit checks from home or office with "MyDeposit," and conduct free person-to-person fund transfers with "Popmoney." The bank offers free mobile banking with many of the same features available through online banking, including free

“Mobile Deposit,” which allows customers to deposit checks through their mobile phone or tablet. ATM service fees are reimbursed for most U.S. domestic ATMs depending upon the type of account held at the bank or products used. Additionally, the bank provides 24-hour automated telephone banking services. Internet and mobile banking services are accessible to anyone who has access to a computer or a compatible mobile phone device. Management provided data that shows the alternate delivery systems provide access to LMI individuals outside of its branch location, with approximately 30 percent of deposit accounts in LMI geographies and 65 percent of LMI customers enrolled in online banking. However, the percentage of LMI customers enrolled in online banking excludes retirement accounts and certificate of deposit accounts. If these accounts are included, the percentage is much lower at 13 percent enrollment rate.

Axos offers products with features that benefit LMI and under-banked individuals. The bank provides payroll debit cards for various employers in a variety of industries and companies. Employees who do not have bank accounts are able to access their wages with the payroll debit cards and avoid paying check-cashing fees. This also provides access to online purchases, bill payment, and other financial services and offers protection against unauthorized usage. Additionally, the bank offers a “second chance” bank account for customers who are unable to obtain checking or savings accounts at other institutions due to marginal ChexSystems history. Consumers then have increased access to financial services with potentially lower cost and may qualify to upgrade to a regular checking or savings account after a period of responsible usage. Management provided data demonstrating that approximately 52 percent of payroll/prepaid cards issued during the evaluation period were issued to LMI individuals.

Community Development Services

Axos provided a very poor level of CD services in the Las Vegas-Henderson-Paradise MSA. During the evaluation period, two bank employees provided 12 hours to serve as instructors to provide a “real world” financial education to students from LMI households in the AA. This is an inadequate level given the average number of 60 branch employees during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the service test in the Reno-Sparks MSA is consistent with the bank’s overall “Low Satisfactory” service test rating for the state of Nevada. Refer to Table 15 in the state of Nevada section of appendix D for the facts and data that support these conclusions.

Conclusions for Supplemental State AAs Outside Axos’s full-scope and limited scope AAs (Lending Test Only)

Overall, lending performance in the supplemental states is poor, with poor performance in the states of Arizona, California, Florida, and Texas. Lending performance in New York and Ohio

is adequate. Lending performance in the supplemental states did not significantly impact the bank's overall "Low Satisfactory" lending performance.

Arizona

Distribution of Loans by Income Level of the Geography

Overall, geographic distribution of loans in the state of Arizona is poor. The geographic distribution of home mortgage loans is poor and the geographic distribution of small business loans is good. Due to the significant weight placed on home mortgage lending, the good geographic distribution of small business loans, did not offset the poor geographic distribution of home mortgage loans.

Home Mortgage Loans

Based on the facts and data in Tables O in the state of Arizona section of appendix D we concluded the geographic distribution of the bank's home mortgage loan originations/purchases is poor.

During the 2016 evaluation period, the distribution of the bank's home mortgage lending in both low- and moderate-income geographies in Arizona was very poor. The bank did not make any loans in low-income CTs. Furthermore, the proportion of the bank's home mortgage loans in moderate-income CTs was significantly below the proportion of owner-occupied housing units and the 2016 aggregate and was very poor.

During the 2017-2018 evaluation period, the bank's performance was slightly stronger, but still poor. The proportion of home mortgage loans in low-income CTs was below the proportion of owner-occupied housing units, but was adequate. However, the proportion of the bank's loans in moderate-income CTs was well below the proportion of owner-occupied housing units and was poor. In addition, the proportion of the bank's loans met the 2017 aggregate in low-income CTs, but was well below the 2017 aggregate in moderate-income CTs.

Small Loans to Businesses

Based on the facts and data in Tables Q in the state of Arizona section of appendix D we concluded the geographic distribution of the bank's origination/purchase of small loans to businesses is good.

During the 2016 evaluation period, the distribution of small loans to businesses in LMI geographies was adequate. The distribution of small loans to businesses in low-income CTs exceeded the proportion of businesses in low-income CTs. However, the proportion of the bank's loans in moderate-income CTs was well below the proportion of businesses in moderate-income CTs. The proportion of small loans to businesses in low-income CTs exceeded the 2016 aggregate; and the proportion of these loans in moderate-income CTs was well below the aggregate.

The bank's performance during the 2017-2018 evaluation period was stronger, and was good. The proportion of small loans to businesses was below the proportion of businesses in low-

income CTs, but it was adequate; the proportion of these loans in moderate-income CTs exceeded the proportion of businesses and was excellent. The proportion of small loans to businesses in low-income CTs was well below the 2017 aggregate and was poor. However, the proportion of loans exceeded the aggregate in moderate-income CTs and was excellent.

Distribution of Loans by Income Level of the Borrower

Overall, borrower distribution of loans in the state of Arizona is poor. The borrower distribution of home mortgage loans is poor and the borrower distribution of small business loans is good. Due to the significant weight placed on home mortgage lending, the good borrower distribution of small business loans, did not offset the poor borrower distribution of home mortgage loans.

Home Mortgage Loans

Based on the facts and data in Tables P in the state of Arizona section of appendix D we concluded the borrower distribution of the bank's origination/purchase of home mortgage loans is poor.

During the 2016 evaluation period, the distribution of home mortgage loans to both low- and moderate-income borrowers was very poor. The proportion of home mortgage loans to low- and moderate-income borrowers was significantly below the proportion of low- and moderate-income families, and was very poor. In addition, the proportion of home mortgage loans to both low- and moderate-income borrowers was significantly below the 2016 aggregate and was very poor.

The bank's performance during the 2017-2018 evaluation period was stronger, but was still poor. The proportion of home mortgage loans to low-income borrowers was significantly below the proportion of low-income families and was very poor. However, the proportion of these loans to moderate-income borrowers was below the proportion of moderate-income families, but was adequate. In addition, the proportion of home mortgage loans to low-income borrowers was significantly below the 2017 aggregate, and was very poor. The proportion of loans to moderate-income borrowers was near to the 2017 aggregate and was good.

Small Loans to Businesses

Based on the facts and data in Tables R in the state of Arizona section of appendix D we concluded the borrower distribution of the bank's origination/purchase of small loans to businesses is good.

During the 2016 evaluation period, the distribution of the bank's small loans to businesses with gross annual revenues of \$1 million or less was good. The proportion of loans was near to the proportion of small businesses in the state and was good. The proportion of small loans to businesses exceeded the 2016 aggregate and was excellent.

The bank's performance during the 2017-2018 evaluation period was similar to 2016 performance. The proportion of loans was near to the proportion of small businesses and was good. The proportion of small loans to businesses exceeded the 2017 aggregate and was excellent.

CALIFORNIA

Distribution of Loans by Income Level of the Geography

Overall, geographic distribution of loans in the state of California is good. The geographic distribution of home mortgage loans is good and the geographic distribution of small business loans is excellent. Due to the significant weight placed on home mortgage lending, the excellent geographic distribution of small business loans, did not materially impact the good geographic distribution of home mortgage loans.

Home Mortgage Loans

Based on the facts and data in Tables O in the state of California section of appendix D we concluded the geographic distribution of the bank's home mortgage loan originations/purchases is good.

During the 2016 evaluation period, the distribution of the bank's home mortgage loans in LMI geographies was good. The proportion of home mortgage loans in low-income geographies exceeded the proportion of owner-occupied housing units. However, the proportion of loans in moderate-income CTs was well below the proportion of owner-occupied housing units and was poor. In addition, the proportion of home mortgage loans in low-income CTs exceeded the 2016 aggregate; but the proportion of loans in moderate-income CTs was below the 2016 aggregate, which was adequate.

The bank's performance during the 2017-2018 evaluation period was similar to 2016 performance and was good. The proportion of the bank's home mortgage loans in low-income CTs exceeded the proportion of owner-occupied housing units. The proportion of the bank's home mortgage loans in moderate-income CTs was below the proportion of owner-occupied housing units, but was adequate. The proportion of home mortgage loans in low-income CTs exceeded the 2017 aggregate; but the proportion of these loans in moderate-income CTs was well below the aggregate and was poor.

Small Loans to Businesses

Based on the facts and data in Tables Q in the state of California section of appendix D, we concluded the geographic distribution of the bank's origination/purchase of small loans to businesses is excellent.

During the 2016 evaluation period, the geographic distribution of the bank's small loans to businesses was excellent. The proportion of the bank's small loans to businesses in both low- and moderate-income CTs exceeded the proportion of businesses in these CTs. In addition, the proportion of the bank's loans exceeded the 2016 aggregate in both low- and moderate-income CTs.

Axos's performance during the 2017-2018 evaluation period mirrored 2016 performance and was excellent.

Distribution of Loans by Income Level of the Borrower

Overall, borrower distribution of loans in the state of California is very poor. The borrower distribution of home mortgage loans is very poor and the borrower distribution of small business loans is good. Due to the significant weight placed on home mortgage lending, the good borrower distribution of small business loans, did not offset the very poor borrower distribution of home mortgage loans.

Home Mortgage Loans

Based on the facts and data in Tables P in the state of California section of appendix D, we concluded the borrower distribution of the bank's home mortgage loan originations/purchases is very poor.

During the 2016 evaluation period, the proportion of the bank's home mortgage loans to both low- and moderate-income borrowers was significantly below the proportion of low- and moderate-income families and was very poor. In addition, the proportion of the bank's home mortgage loans to low- and moderate-income borrowers was significantly below the 2016 aggregate and was very poor.

The bank's performance during the 2017-2018 evaluation period was identical to performance in 2016 and was very poor. The proportion of the bank's home mortgage loans to both low- and moderate-income borrowers was significantly below the proportion of low- and moderate-income families and was very poor. In addition, the proportion of the bank's home mortgage loans to low- and moderate-income borrowers was significantly below the 2017 aggregate and was very poor.

Small Loans to Businesses

Based on the facts and data in Tables R in the state of California section of appendix D, we concluded the borrower distribution of the bank's origination and purchase of small loans to businesses is good.

During the 2016 evaluation period, the distribution of the bank's small loans to businesses with gross annual revenues of \$1 million or less was good. The proportion of loans was below the proportion of small businesses, but it was adequate. The proportion of small loans to businesses exceeded the 2016 aggregate and was excellent.

During the 2017-2018 evaluation period, the bank's performance was similar to 2016 performance. The proportion of small loans to businesses was below the proportion of small businesses and was adequate. The proportion of small loans to businesses exceeded the 2017 aggregate and was excellent.

FLORIDA

Distribution of Loans by Income Level of the Geography

Overall, geographic distribution of loans in the state of Florida is adequate. The geographic distribution of home mortgage loans is poor and the geographic distribution of small business loans is excellent.

Home Mortgage Loans

Based on the facts and data in Tables O in the state of Florida section of appendix D we concluded the geographic distribution of the bank's home mortgage loan originations/purchases is poor.

During the 2016 evaluation period, the bank's distribution of home mortgage loans in LMI CTs was very poor. The bank did not make any home mortgage loans in low-income CTs. Furthermore, the proportion of the bank's home mortgage loans in moderate-income CTs was significantly below the proportion of owner-occupied housing units and the 2016 aggregate and was very poor.

The bank's performance during the 2017-2018 evaluation period was slightly stronger, but was still poor. The proportion of home mortgage loans in both low- and moderate-income CTs was well below the proportion of owner-occupied housing units and was poor. The proportion of these loans in low-income CTs was near to the 2017 aggregate and was good. However, the proportion of home mortgage loans in moderate-income CTs was well below the 2017 aggregate and was poor.

Small Loans to Businesses

Based on the facts and data in Tables Q in the state of Florida section of appendix D we concluded the geographic distribution of the bank's origination/purchase of small loans to businesses is excellent.

During the 2016 evaluation period, the proportion of the bank's small loans to businesses in both low- and moderate-income CTs exceeded the proportion of businesses in these CTs. In addition, the proportion of the bank's loans exceeded the 2016 aggregate in both low- and moderate-income CTs.

Axos's performance during the 2017-2018 evaluation period was identical to 2016 performance and was excellent.

Distribution of Loans by Income Level of the Borrower

Overall, borrower distribution of loans in the state of Florida is very poor. The borrower distribution of home mortgage loans is very poor and the borrower distribution of small business loans is good. Due to the significant weight placed on home mortgage lending, the good borrower distribution of small business loans, did not offset the very poor borrower distribution of home mortgage loans.

Home Mortgage Loans

Based on the facts and data in Tables P the state of Florida section of appendix D, we concluded the borrower distribution of the bank's home mortgage loan originations/purchases is very poor.

During the 2016 evaluation period, the proportion of the bank's home mortgage loans to both low- and moderate-income borrowers was significantly below the proportion of low- and moderate-income families and was very poor. In addition, the proportion of the bank's home mortgage loans to low- and moderate-income borrowers was significantly below the 2016 aggregate and was very poor.

The bank's performance during the 2017-2018 evaluation period was identical to performance in 2016 and was very poor. The proportion of the bank's home mortgage loans to both low- and moderate-income borrowers was significantly below the proportion of low- and moderate-income families and was very poor. In addition, the proportion of the bank's home mortgage loans to low- and moderate-income borrowers was significantly below the 2017 aggregate and was very poor.

Small Loans to Businesses

Based on the facts and data in Tables R in the state of Florida section of appendix D, we concluded the borrower distribution of the bank's origination/purchase of small loans to businesses is good.

During the 2016 evaluation period, the distribution of the bank's small loans to businesses with gross annual revenues of \$1 million or less was adequate. The proportion of loans was below the proportion of small businesses, but it was adequate. The proportion of small loans to businesses exceeded the 2016 aggregate and was excellent.

The bank's performance during the 2017-2018 evaluation period was stronger. The proportion of small loans to businesses was near to the proportion of small businesses and was good. The proportion of small loans to businesses exceeded the 2017 aggregate and was excellent.

NEW YORK

Distribution of Loans by Income Level of the Geography

Overall, geographic distribution of loans in the state of New York is excellent. The geographic distribution of both home mortgage and small business loans is excellent.

Home Mortgage Loans

Based on the facts and data in Tables O in the state of New York section of appendix D, we concluded the geographic distribution of the bank's home mortgage loan originations/purchases is excellent.

During the 2016 evaluation period, the proportion of the bank's home mortgage lending in both low- and moderate-income CTs exceeded the proportion of owner-occupied housing units. In addition, the proportion of home mortgage loans exceeded the 2016 aggregate in both low- and moderate-income CTs.

The bank's performance during the 2017-2018 evaluation period was slightly weaker, but still excellent. The proportion of home mortgage loans exceeded the proportion of owner-occupied housing units in low-income CTs and was near to the proportion of owner-occupied housing units in moderate-income CTs. In addition, the proportion of home mortgage loans exceeded the 2017 aggregate in low-income CTs and was near to the 2017 aggregate in moderate-income CTs.

Small Loans to Businesses

Based on the facts and data in Tables Q in the state of New York section of appendix D we concluded the geographic distribution of the bank's origination/purchase of small loans to businesses is excellent.

During the 2016 evaluation period, the distribution of the bank's small loans to businesses in low- and moderate-income geographies was good. The proportion of the bank's small loans to businesses was well below the proportion of businesses in low-income CTs and was poor. However, the proportion of the bank's loans exceeded the proportion of businesses in moderate-income CTs and was excellent. In addition, the proportion of the bank's loans in low-income CTs was well below the 2016 aggregate and was poor. However, the proportion of the bank's loans in moderate-income CTs exceeded the 2016 aggregate and was excellent.

The bank's performance during the 2017-2018 evaluation period was stronger and was excellent. The proportion of the bank's small loans to businesses in both low- and moderate-income CTs exceeded the proportion of businesses in these CTs. In addition, the proportion of small loans to businesses was near to the 2017 aggregate in low-income CTs and was good. The proportion of these loans in moderate-income CTs exceeded the 2017 aggregate and was excellent.

Distribution of Loans by Income Level of the Borrower

Overall, borrower distribution of loans in the state of New York is very poor. The borrower distribution of home mortgage loans is very poor and the borrower distribution of small business loans is good. Due to the significant weight placed on home mortgage lending, the good borrower distribution of small business loans, did not offset the very poor borrower distribution of home mortgage loans.

Home Mortgage Loans

Based on the facts and data in Tables P in the state of New York section of appendix D, we concluded the borrower distribution of the bank's home mortgage loan originations/purchases is very poor.

During the 2016 evaluation period, the proportion of the bank's home mortgage loans to both low- and moderate-income borrowers was significantly below the proportion of low- and moderate-income families and was very poor. In addition, the proportion of the bank's home mortgage loans to low- and moderate-income borrowers was significantly below the 2016 aggregate and was very poor.

The bank's performance during the 2017-2018 evaluation period was identical to performance in 2016 and was very poor. The proportion of the bank's home mortgage loans to both low- and moderate-income borrowers was significantly below the proportion of low- and moderate-income families and was very poor. In addition, the proportion of the bank's home mortgage loans to low- and moderate-income borrowers was significantly below the 2017 aggregate and was very poor.

Small Loans to Businesses

Based on the facts and data in Tables R in the state of New York section of appendix D, we concluded the borrower distribution of the bank's small loans to businesses is good.

During the 2016 evaluation period, the distribution of the bank's small loans to businesses with gross annual revenues of \$1 million or less was good. The proportion of loans was near to the proportion of small businesses, and was good. The proportion of small loans to businesses exceeded the 2016 aggregate and was excellent.

The bank's performance during the 2017-2018 evaluation period was slightly weaker, but was still good. The proportion of small loans to businesses was below the proportion of small businesses and was adequate. The proportion of small loans to businesses exceeded the 2017 aggregate and was excellent.

OHIO

Distribution of Loans by Income Level of the Geography

Overall, geographic distribution of loans in the state of Ohio is poor. The geographic distribution of home mortgage loans is poor and the geographic distribution of small business loans is good. Due to the significant weight placed on home mortgage lending, the good geographic distribution of small business loans, did not offset the poor geographic distribution of home mortgage loans.

Home Mortgage Loans

Based on the facts and data in Tables O in the state of Ohio section of appendix D we concluded the geographic distribution of the bank's home mortgage loan originations/purchases is poor.

During the 2016 evaluation period, the geographic distribution of the bank's home mortgage loans was very poor. The bank did not make any home mortgage loans in low-income CTs. In addition, the proportion of the bank's home mortgage loans in moderate-income CTs was significantly below the proportion of owner-occupied units and the 2016 aggregate.

The bank's performance during the 2017-2018 evaluation period was stronger, but still poor. The proportion of the bank's home mortgage loans in low-income CTs exceeded the proportion of owner-occupied housing units. However, the proportion of the bank's loans in moderate-income CTs was significantly below the proportion of owner-occupied units. In addition, the proportion of home mortgage loans in low-income CTs exceeded the 2017 aggregate. However, the proportion of these loans in moderate-income CTs was significantly below the 2017 aggregate and was very poor.

Small Loans to Businesses

Based on the facts and data in Tables R in the state of Ohio section of appendix D, we concluded the geographic distribution of the bank's origination/purchase of small loans to businesses is good.

During the 2016 evaluation period, the distribution of the bank's small loans to businesses in low- and moderate-income geographies was adequate. The proportion of the bank's small loans to businesses was significantly below the proportion of businesses in low-income CTs. However the proportion of the bank's loans in moderate-income CTs significantly exceeded the proportion of businesses. In addition, the proportion of loans in low-income CTs was significantly below the 2016 aggregate. However, the proportion of loans in moderate-income CTs significantly exceeded the 2016 aggregate.

The bank's performance during the 2017-2018 evaluation period was stronger and was good. The proportion of the bank's small loans to businesses in low-income CTs exceeded the proportion of the businesses in these CTs; and the proportion of small loans to businesses in moderate-income CTs was near to the proportion of businesses in moderate-income CTs. In addition, the proportion of the bank's small loans to businesses exceeded the 2017 aggregate in both low- and moderate-income CTs.

Distribution of Loans by Income Level of the Borrower

Overall, borrower distribution of loans in the state of Ohio is adequate. The borrower distribution of home mortgage loans is poor and the borrower distribution of small business loans is excellent.

Home Mortgage Loans

Based on the facts and data in Tables P in the state of Ohio section of appendix D, we concluded the borrower distribution of the bank's home mortgage loan originations/purchases is poor.

During the 2016 evaluation period, the distribution of the bank's home mortgage loans to low- and moderate-income borrowers was very poor. The proportion of the bank's loans to both low- and moderate-income borrowers was significantly below the proportion of low- and moderate-income families. In addition, the proportion of the bank's home mortgage loans to both low- and moderate-income borrowers was significantly below the 2016 aggregate.

The bank's performance during the 2017-2018 evaluation period was stronger, but still poor. The proportion of the bank's home mortgage loans to low-income borrowers was significantly below the proportion of low-income families and was very poor. However, the proportion of these loans to moderate-income families was below the proportion of moderate-income families and was adequate. In addition, the proportion of the bank's loans to low-income borrowers was significantly below the 2017 aggregate, and was very poor. The proportion of the bank's loans to moderate-income borrowers was below the aggregate and was adequate.

Small Loans to Businesses

Based on the facts and data in Tables R in the state of Ohio section of appendix D, we concluded the borrower distribution of the bank's small loans to businesses is excellent.

During the 2016 evaluation period, the distribution of the bank's small loans to businesses with gross annual revenues of \$1 million or less was excellent. The proportion of the bank's loans to businesses that are small exceeded the proportion of small businesses. In addition, the proportion of the bank's loans to these businesses significantly exceeded the 2016 aggregate.

The bank's performance during the 2017-2018 evaluation period was identical to 2016 performance and was excellent. The proportion of the bank's loans to businesses that are small exceeded the proportion of these businesses. In addition, the proportion of the bank's loans to small businesses significantly exceeded the 2017 aggregate.

TEXAS

Distribution of Loans by Income Level of the Geography

Overall, geographic distribution of loans in the state of Texas is adequate. The geographic distribution of home mortgage loans is poor and the geographic distribution of small business loans is excellent.

Home Mortgage Loans

Based on the facts and data in Tables O in the state of Texas section of appendix D we concluded the geographic distribution of the bank's home mortgage loan originations/purchases is poor.

During the 2016 evaluation period, the geographic distribution of the bank's home mortgage loans was poor. The proportion of the bank's home mortgage loans in low-income CTs was below the proportion of owner-occupied units, but was adequate. However, the proportion of the bank's loans in moderate-income CTs was significantly below the proportion of owner-occupied units and was very poor. In addition, the proportion of the bank's loans in low-income CTs exceeded the 2016 aggregate and was excellent. However, the proportion of the bank's loans in moderate-income CTs was significantly below the aggregate and was very poor.

The bank's performance during the 2017-2018 evaluation period was similar and was poor. The proportion of the bank's home mortgage loans was below the proportion of owner-

occupied units and was adequate. However, the proportion of the bank's loans in moderate-income CTs was significantly below the proportion of owner-occupied units and was very poor. In addition, the proportion of the bank's loans in low-income CTs exceeded the 2017 aggregate; but the proportion of the bank's loans in moderate-income CTs was well below the 2017 aggregate and was poor.

Small Loans to Businesses

Based on the facts and data in Tables Q in the state of Texas section of appendix D we concluded the geographic distribution of the bank's origination/purchase of small loans to businesses is excellent.

During the 2016 evaluation period, the proportion of the bank's small loans to businesses in both low- and moderate-income CTs exceeded the proportion of businesses in these CTs. In addition, the proportion of the bank's loans exceeded the 2016 aggregate in both low- and moderate-income CTs.

Axos's performance during the 2017-2018 evaluation period mirrored 2016 performance and was excellent.

Distribution of Loans by Income Level of the Borrower

Overall, borrower distribution of loans in the state of Texas is poor. The borrower distribution of home mortgage loans is poor and the borrower distribution of small business loans is good. Due to the significant weight placed on home mortgage lending, the good borrower distribution of small business loans, did not offset the poor borrower distribution of home mortgage loans.

Home Mortgage Loans

Based on the facts and data in Tables P the state of Texas section of appendix D, we concluded the borrower distribution of the bank's home mortgage loan originations and purchases is poor.

During the 2016 evaluation period, the proportion of the bank's home mortgage loans to low- and moderate-income borrowers was very poor. The proportion of the bank's loans to both low- and moderate-income borrowers was substantially below the proportion of low- and moderate-income families and was very poor. In addition, the proportion of home mortgage loans to low-income borrowers was significantly below the 2016 aggregate and was very poor. The proportion of the bank's loans to moderate-income borrowers was near to the 2016 aggregate and was good.

The bank's performance during the 2017-2018 evaluation period was slightly stronger, but was still poor. The proportion of the bank's home mortgage loans to low-income borrowers was substantially below the proportion of low-income families and was very poor. The proportion of loans to moderate-income borrowers was below the proportion of moderate-income families and was adequate. In addition, the proportion of the bank's home mortgage loans to low-income borrowers was substantially below the 2017 aggregate and was very poor. The

proportion of these loans to moderate-income borrowers was below the 2017 aggregate and was adequate.

Small Loans to Businesses

Based on the facts and data in Tables R in the state of Texas section of appendix D, the borrower distribution of the bank's origination/purchase of small loans to businesses is good.

During the 2016 evaluation period, the distribution of the bank's small loans to businesses with gross annual revenues of \$1 million or less was good. The proportion of the bank's loans to businesses that are small was near to the proportion of these businesses. In addition, the proportion of the bank's loans to small businesses exceeded the 2016 aggregate.

The bank's performance during the 2017-2018 evaluation period was identical to 2016 performance and was good. The proportion of the bank's loans small businesses was near to the proportion of these businesses. In addition, the proportion of the bank's loans to small businesses exceeded the 2017 aggregate.

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 metropolitan and nonmetropolitan areas 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	Lending Test (excludes CD loans): (01/01/16 – 12/31/18) Investment and Service Tests and CD Loans: (6/7/16 – 12/31/18)	
Financial Institution	Products Reviewed	
Axos Bank (Axos)	HMDA Loans CRA Loans CD Loans, Investments and Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
State of California San Diego-Carlsbad MSA #41740	Full-Scope	
State of Nevada Las Vegas-Henderson- Paradise MSA #29820	Full-Scope	
Reno-Sparks MSA #39900	Limited-Scope	
Supplemental AAs	Limited to Lending Test	
<ul style="list-style-type: none"> • Arizona • California • Florida • New York • Ohio • Texas 		

Appendix B: Summary of Metropolitan Areas and State Ratings

RATINGS – AXOS BANK				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
AXOS BANK	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State:				
CALIFORNIA	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
NEVADA	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State Supplemental Ratings (Lending Test Only)				
ARIZONA	Needs to Improve			
CALIFORNIA	Needs to Improve			
FLORIDA	Needs to Improve			
NEW YORK	Low Satisfactory			
OHIO	Low Satisfactory			
TEXAS	Needs to Improve			

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Community Profiles for Full-Scope Areas

State of California

San Diego-Carlsbad MSA

San Diego-Carlsbad MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	628	10.0	21.3	36.1	31.5	1.0
Population by Geography	3,095,313	9.8	21.6	35.2	33.1	0.3
Housing Units by Geography	1,154,874	8.4	20.3	36.7	34.5	0.0
Owner-Occupied Units by Geography	593,945	3.3	14.3	38.8	43.6	0.0
Occupied Rental Units by Geography	467,844	15.0	27.6	33.9	23.5	0.0
Vacant Units by Geography	93,085	8.0	22.5	37.6	31.9	0.0
Businesses by Geography	245,710	5.7	15.5	35.2	43.3	0.2
Farms by Geography	4,775	4.0	16.0	38.8	41.3	0.0
Family Distribution by Income Level	703,747	22.4	17.6	18.7	41.3	0.0
Household Distribution by Income Level	1,061,789	23.7	16.6	17.7	41.9	0.0
Median Family Income MSA - 41740 San Diego-Carlsbad, CA MSA		\$73,560	Median Housing Value			\$496,417
			Median Gross Rent			\$1,274
			Families Below Poverty Level			8.6%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Axos Bank operates one branch and one full-service ATM in the San Diego-Carlsbad MSA. The AA consists of the entire county of San Diego and includes the cities of San Diego, Chula Vista, Oceanside, Carlsbad, Escondido, La Jolla, El Cajon, National City, and Encinitas. It is the most southwestern county in the contiguous United States. There are over 3.2 million inhabitants in the county, making it the fifth most populous county in the United States. Low-income CTs represent almost 10 percent and moderate-income CTs represent 21 percent of total CTs in the county. Almost 10 percent of the population is low-income and almost 22 percent is moderate-income. In addition, almost nine percent of the families in the county is below the poverty level. The 2018 FFIEC adjusted median family income was \$79,179.

Economy

The largest employment sectors in the San Diego economy are defense/military, tourism, international trade, and research/manufacturing. Agriculture is also a significant source of employment in the county. The top ten employers in the county are the University of California, San Diego; the County of San Diego; the U.S. Navy, San Diego; the City of San Diego; the San Diego Unified School District; Sharp Health Care; Scripps Health; Qualcomm, Inc.; Kaiser Foundation Hospital; and San Diego State University. As of December 31, 2018,

San Diego County had an unemployment rate of 3.4 percent, which is below the State of California's unemployment rate of 4.2 percent and the national unemployment rate of 3.9 percent.

Housing and Opportunities for Home Mortgage Lending

Similar to other major counties in California, San Diego County is experiencing a housing crisis, partly because the home building in the county has not kept pace with the population growth. In addition, rising home prices have made it difficult for individuals with lower incomes to qualify for home purchase mortgage loans. Furthermore, numerous low- and moderate-income CTs are experiencing gentrification.

As of December 2018, the median housing value for a home in San Diego County was \$590,500 and the median price of homes that sold was \$558,100. The lack of affordable housing units makes it difficult for financial institutions to originate home purchase loans to LMI individuals. However, there are opportunities for banks to become involved in programs that provide options for LMI individuals and families to purchase homes. In addition, there are still opportunities to provide home refinance and home improvement loans to LMI individuals who own their homes.

Opportunities for Commercial Lending to Small Businesses

There were numerous opportunities for lending to small businesses due to an improving economy and the number of small businesses located within San Diego County. The 2018 Dun & Bradstreet data indicates there were 222,222 small businesses with annual revenues of \$1 million or less located in San Diego County. In addition, 89 percent of these had nine or fewer employees. The City of San Diego ranks as the ninth best city for small businesses. Furthermore, San Diego was designated by a Forbes columnist as the best city to launch a small business or start-up company.

Competition

Competition for both deposits and loans is intense in San Diego County. Based on the June 2016, 2017 and 2018 FDIC Deposit Market Share reports, 53 financial institutions competed for deposits in San Diego County. The competition for loans is even more intense. Peer Mortgage Loan Data indicates that in 2018, 567 lenders competed for home purchase loans, 560 lenders competed for home refinance loans, and 59 lenders competed for multifamily loans. Peer Small Business Loan Data indicates that 157 lenders competed for small business loans.

Community Development Needs

Community groups indicate the following are the most significant community development needs in the San Diego-Carlsbad MSA:

- Affordable housing loans for LMI individuals.
- Development finance for transitional housing and single family residences.

- Loans and investments in affordable rental housing and homeownership programs.
- Creation and marketing of first-time homebuyer loan products.
- Bank participation in first-time homebuyer loan programs to meet the needs of first-time homebuyers who desire to purchase a single family residence.
- Flexible and affordable loan programs for small businesses, rather than relying primarily on CDFIs and non-banks to provide loans to riskier businesses.
- Funding for micro loan programs at affordable rates (lower than credit card rates).
- Lines of credit for small businesses.
- Community development loans, investments and donations for CDFIs and other community organizations that provide services to LMI individuals and small businesses.
- Donations to programs that boost self-confidence and access to the arts for LMI youth.
- Financial literacy education for LMI individuals.
- Investments and donations to meet the needs of homeless individuals, particularly first-time homeless individuals.
- Serving as board members for nonprofits in order to provide banking expertise, particularly as related to financing.

State of Nevada

Las Vegas-Henderson-Paradise MSA

Las Vegas-Henderson-Paradise MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	487	5.7	26.3	37.2	30.6	0.2
Population by Geography	2,035,572	5.0	25.3	39.2	30.3	0.2
Housing Units by Geography	857,131	5.6	24.9	38.7	30.6	0.2
Owner-Occupied Units by Geography	380,425	1.9	16.9	41.7	39.5	0.0
Occupied Rental Units by Geography	344,021	8.7	33.0	36.9	21.1	0.2
Vacant Units by Geography	132,685	8.1	27.0	34.8	29.5	0.6
Businesses by Geography	106,481	3.8	22.4	38.2	35.0	0.7
Farms by Geography	1,578	2.3	20.6	41.6	35.4	0.1
Family Distribution by Income Level	465,442	20.7	18.4	20.5	40.5	0.0
Household Distribution by Income Level	724,446	22.6	17.0	18.8	41.6	0.0
Median Family Income MSA - 29820 Las Vegas-Henderson-Paradise, NV MSA		\$59,993	Median Housing Value			\$169,213
			Median Gross Rent			\$1,032
			Families Below Poverty Level			11.9%
<i>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.</i>						

The bank operates one branch and no ATMs in the Las Vegas-Henderson-Paradise MSA. The AA consists of the entire county of Clark. Clark County is the largest MSA in Nevada and includes the cities of Las Vegas, Henderson, North Las Vegas, Boulder City, and Mesquite. More than 2 million people live in Clark County, making it the most populous county in Nevada. Low-income CTs represent almost six percent of the total CTs and moderate-income CTs represent 26 percent. Almost 12 percent of the families in the county is below the poverty level. The FFIEC adjusted median family income is \$59,993.

Economy

Traditionally, the driving force in Clark County has been the tourism and hospitality industry. This supports 32 percent of the jobs in the area and generates more than \$9.7 billion in gaming revenue to the county’s economy. Other important industries are education; retail trade; construction; healthcare and social assistance; and manufacturing, professional, scientific, and technical. The primary employers are the Clark County School District, Las Vegas Sands, Caesars Entertainment, MGM Resorts International, and Wynn Resorts. The unemployment rate as of December 31, 2018 was 4.5 percent. This was lower than that of the state of Nevada, which was 4.6 percent, but higher than the national unemployment rate of 3.9 percent.

Housing and Opportunities for Home Mortgage Lending

Although the economy has improved in Clark County, many individuals are still struggling since the AA was one of the hardest hit areas during the housing collapse. Currently, there is insufficient housing stock available for LMI and new developments are encountering resistance from local residents who view their areas and schools as over-crowded and don't want affordable housing built in their neighborhoods. This is partly because there is still a stigma around low-income individuals and families. Furthermore, a number of low- and moderate-income CTs are experiencing gentrification.

As of May 2017, the median price of homes that sold was \$250,000. This price continued to increase throughout 2018. The lack of affordable housing units makes it difficult for financial institutions to originate home purchase loans to LMI individuals. However, there are opportunities for banks to become involved in programs that provide options for LMI individuals and families to purchase homes. In addition, there are opportunities to provide home refinance and home improvement loans to LMI individuals who own their homes.

Opportunities for Commercial Lending to Small Businesses

In addition to Nevada's lenient tax structure, the state offers several programs to entice new businesses. Several tax abatement and tax deferral programs exist, as well as renewable energy abatements, industrial development bonds, and a global trade program. This all makes the area attractive to new businesses, which have located to the area from California. The 2018 Dun & Bradstreet data indicates there were 89,785 small businesses with annual revenues of \$1 million or less located in Clark County. In addition, 85 percent of the businesses had nine or fewer employees.

Competition

Competition for both deposits and loans is intense in Clark County. Based on the 2018 FDIC Deposit Market Share report, 40 financial institutions competed for deposits in Clark County. The competition for loans is even more intense. Peer Mortgage Loan Data indicates that in 2017, 394 lenders competed for home purchase loans and 328 lenders competed for home refinance loans. Peer Small Business Loan Data indicates that 153 lenders competed for small business loans.

Community Development Needs

Community groups indicate the following are the most significant community development needs in the Las Vegas-Henderson-Paradise MSA:

- Affordable housing loans for LMI individuals.
- Loans for affordable rental housing for LMI individuals.
- Assistance with developing affordable housing projects, which includes financing to purchase existing foreclosed homes and improving them to make them livable for LMI.

- Down payment assistance for homes for LMI individuals.
- Access to capital for small businesses. Banks can help by establishing a better referral relationship with the local CDFIs.
- Small loans (\$100,000 or less) for small businesses.
- Investments for lending capital, which in turn will be used to lend to small businesses.
- Financial literacy programs for LMI. (Specifically, banks can help fund the programs, rather than just volunteer.)
- Banking products and services such as checking accounts with no minimum balance requirement and no overdraft fees, as well as savings accounts.
- Larger grants that are not so restrictive.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables O through T and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables O through T. 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 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- 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 market share information based on the most recent aggregate market data 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 MSA/assessment area. The table also presents aggregate peer data for the years the data is available.

- Table Q. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table R. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table S. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography (Optional)** – 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 throughout those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Geography (Optional)** - 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 MA/assessment area

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Tables of Performance Data

State of California

Table 1. Lending Volume

LENDING VOLUME		Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018						
Assessment Area (2017):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
San Diego-Carlsbad MSA	100.00	677	509,708	311	20,067	0	0	30	33,542	1,018	563,317	100.00

* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2016 to December 31, 2017.

*** Deposit Data as of April 16, 2019. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
San Diego-Carlsbad MSA	247	145,415	100.0	141,802	3.3	1.6	3.2	14.3	8.5	13.2	38.8	30.4	38.1	43.6	59.5	45.5	0.0	0.0	0.0	
Total	247	145,415	100.0	141,802	3.3	1.6	3.2	14.3	8.5	13.2	38.8	30.4	38.1	43.6	59.5	45.5	0.0	0.0	0.0	

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
San Diego-Carlsbad MSA	430	364,293	100.0	102,759	2.8	4.9	3.5	15.1	13.7	16.4	35.5	23.3	35.7	46.6	58.1	44.3	0.0	0.0	0.0	
Total	430	364,293	100.0	102,759	2.8	4.9	3.5	15.1	13.7	16.4	35.5	23.3	35.7	46.6	58.1	44.3	0.0	0.0	0.0	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
San Diego-Carlsbad MSA	247	145,415	100.0	141,802	22.4	0.8	1.5	17.6	4.0	6.3	18.7	11.7	17.5	41.3	78.5	55.9	0.0	4.9	18.8
Total	247	145,415	100.0	141,802	22.4	0.8	1.5	17.6	4.0	6.3	18.7	11.7	17.5	41.3	78.5	55.9	0.0	4.9	18.8

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
San Diego-Carlsbad MSA	430	364,293	100.0	102,759	23.6	1.6	2.4	16.9	5.8	8.6	17.8	10.9	20.3	41.7	70.0	55.2	0.0	11.6	13.5
Total	430	364,293	100.0	102,759	23.6	1.6	2.4	16.9	5.8	8.6	17.8	10.9	20.3	41.7	70.0	55.2	0.0	11.6	13.5

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2016**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
San Diego-Carlsbad MSA	96	7,272	100.0	123,509	5.7	5.2	4.4	15.5	22.9	14.1	35.2	41.7	34.4	43.3	29.2	47.1	0.2	1.0	0.1
Total	96	7,272	100.0	123,509	5.7	5.2	4.4	15.5	22.9	14.1	35.2	41.7	34.4	43.3	29.2	47.1	0.2	1.0	0.1

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
San Diego-Carlsbad MSA	215	12,795	100.0	90,218	5.5	5.6	4.7	15.1	20.9	14.4	35.1	40.0	34.9	44.1	33.5	45.9	0.2	0.0	0.1
Total	215	12,795	100.0	90,218	5.5	5.6	4.7	15.1	20.9	14.4	35.1	40.0	34.9	44.1	33.5	45.9	0.2	0.0	0.1

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
San Diego-Carlsbad MSA	96	7,272	100.0	123,509	87.6	60.4	42.1	5.1	39.6	7.2	0.0	
Total	96	7,272	100.0	123,509	87.6	60.4	42.1	5.1	39.6	7.2	0.0	
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
San Diego-Carlsbad MSA	215	12,795	100.0	90,218	87.4	71.6	51.3	5.2	28.4	7.4	0.0	
Total	215	12,795	100.0	90,218	87.4	71.6	51.3	5.2	28.4	7.4	0.0	
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table 14 – QUALIFIED INVESTMENTS		Geography: CALIFORNIA				Evaluation Period: June 7, 2016 – December 31, 2018			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
San Diego-Carlsbad MSA	12	15,590	44	18,855	56	26,444	100%	0	0.00

* '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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Nevada Evaluation Period: January 1, 2016 TO December 31, 2018																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
San Diego-Carlsbad MSA	100	1	100				1	0	0	0	0	0	0	8.9	23.6	32.5	34.7

Table 14 - QUALIFIED INVESTMENTS									
Geography: REGIONAL AND AREAS OUTSIDE THE BANK'S AA									
Evaluation Period: June 7, 2016 – December 31, 2018									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Regional	1	339	6	13,802	7	14,139		0	0.00
Other – Outside the Bank's AAs	1	1	9	12,445	10	12,446		0	0.00

* '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.

Tables of Performance Data

State of Nevada

Table 1. Lending Volume

LENDING VOLUME		Geography: NEVADA						Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018				
Assessment Area (2017):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Las Vegas-Henderson-Paradise MSA	89.74	304	98,201	296	12,234	0	0	2	6,450	602	116,885	100.00
Limited Review:												
Reno MSA	10.26	72	24,487	53	1,755	0	0	1	2,900	126	29,142	0.00

* For the Reno AA, we only evaluated borrower and geographic distribution for 2016.

* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2016 to December 31, 2017.

*** Deposit Data as of April 16, 2019. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Las Vegas-Henderson-Paradise MSA	78	25,726	73.6	93,034	1.7	0.0	0.9	15.5	2.6	9.0	45.7	29.5	45.1	37.1	67.9	45.0	0.0	0.0	0.0
Reno MSA	28	8,076	26.4	22,424	3.5	3.6	1.8	15.4	3.6	11.0	37.8	10.7	39.6	43.3	82.1	47.5	0.0	0.0	0.0
Total	106	33,802	100.0	115,458	2.1	0.9	1.1	15.5	2.8	9.4	44.1	24.5	44.1	38.3	71.7	45.5	0.0	0.0	0.0

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing 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
Las Vegas-Henderson-Paradise MSA	226	72,475	83.7	88,714	1.9	1.3	1.1	16.9	8.0	12.4	41.7	38.1	43.7	39.5	52.2	42.6	0.0	0.4	0.1
Reno MSA	44	16,411	16.3	19,491	2.7	0.0	2.5	12.5	15.9	9.4	44.6	31.8	46.5	39.9	52.3	41.3	0.4	0.0	0.3
Total	270	88,885	100.0	108,205	2.1	1.1	1.4	16.0	9.3	11.9	42.3	37.0	44.2	39.6	52.2	42.4	0.1	0.4	0.1

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

*For the Reno AA, we only evaluated borrower and geographic distribution for 2016.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Las Vegas-Henderson-Paradise MSA	78	25,726	73.6	93,034	20.1	1.3	3.7	18.0	6.4	14.1	22.0	19.2	19.6	39.9	73.1	37.2	0.0	0.0	25.4
Reno MSA	28	8,076	26.4	22,424	20.9	7.1	3.9	17.8	3.6	14.1	20.6	17.9	22.6	40.7	71.4	42.1	0.0	0.0	17.4
Total	106	33,802	100.0	115,458	20.3	2.8	3.8	18.0	5.7	14.1	21.7	18.9	20.1	40.0	72.6	38.2	0.0	0.0	23.9

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Las Vegas-Henderson-Paradise MSA	226	72,475	83.7	88,714	20.7	3.1	3.7	18.4	10.2	15.0	20.5	19.5	21.4	40.5	65.9	38.5	0.0	0.9	21.4
Reno MSA	44	16,411	31.0	19,491	21.0	2.3	4.0	17.3	11.4	13.5	20.7	20.5	22.8	41.0	63.6	44.4	0.0	2.3	15.3
Total	270	88,885	100.0	108,205	20.7	3.0	3.8	18.2	10.4	14.8	20.5	19.6	21.6	40.6	65.6	39.5	0.0	1.1	20.3

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

*For the Reno AA, we only evaluated borrower and geographic distribution for 2016.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Las Vegas-Henderson-Paradise MSA	71	2,994	85.5	47,832	5.1	0.0	2.9	21.0	21.1	16.3	42.4	50.7	42.0	31.5	28.2	38.9	0.0	0.0	0.0
Reno MSA	12	442	14.5	15,253	10.5	33.3	6.3	29.3	25.0	22.3	22.2	8.3	22.9	32.9	16.7	45.7	5.1	16.7	2.8
Total	83	3,436	100.0	63,085	6.2	4.8	3.7	22.7	21.7	17.7	38.3	44.6	37.3	31.8	26.5	40.5	1.0	2.4	0.7

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

*For the Reno AA, we only evaluated borrower and geographic distribution for 2016.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Las Vegas-Henderson-Paradise MSA	225	9,240	84.6	43,273	3.9	4.9	2.9	22.6	19.6	19.2	38.1	47.1	38.1	34.8	28.4	39.4	0.7	0.0	0.4
Reno MSA	41	1,313	15.4	10,523	8.9	19.5	7.4	25.5	43.9	23.1	28.4	22.0	28.9	31.5	9.8	36.8	5.6	4.9	3.8
Total	266	10,553	100.0	53,796	4.9	7.1	3.8	23.2	23.3	20.0	36.1	43.2	36.3	34.1	25.6	38.8	1.7	0.8	1.1

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

* For the Reno AA, we only evaluated borrower and geographic distribution for 2016.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Las Vegas-Henderson-Paradise MSA	71	2,994	85.5	47,832	83.1	64.8	45.4	6.1	35.2	10.8	0.0
Reno MSA	12	442	14.5	15,253	80.3	83.3	40.9	7.4	16.7	12.2	0.0
Total	83	3,436	100.0	63,085	82.5	67.5	44.3	6.4	32.5	11.1	0.0

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Las Vegas-Henderson-Paradise MSA	225	9,240	84.6	43,273	84.3	75.1	50.4	5.5	24.9	10.1	0.0
Reno MSA	41	1,313	15.4	10,523	80.9	65.9	49.3	7.0	34.1	12.1	0.0
Total	266	10,553	100.0	53,796	83.6	73.7	50.2	5.8	26.3	10.5	0.0

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

* For the Reno AA, we only evaluated borrower and geographic distribution for 2016.

Table 14 - QUALIFIED INVESTMENTS		Geography: NEVADA				Evaluation Period: June 7, 2016 through December 31, 2018			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Las Vegas-Henderson-Paradise MSA	0	0.00	5	8,095	5	8,095	100%	0	0.00
Limited Review:									
Reno-Sparks MSA	0	0.00	0	0.00	0	0.00	0%	0	0.00

* '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.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: Nevada Evaluation Period: January 1, 2016 TO December 31, 2018																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Las Vegas-Henderson-Paradise MSA	100	1	100			1		1	0					5.0	26.3	37.2	30.6
Limited Scope Review:																	
Reno-Sparks	100	1	100			1		0	1					8.5	19.0	41.8	29.3

Tables of Lending Performance Data

State of Arizona

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Arizona AA	184	75,535	100.0	318,440	3.1	0.0	1.5	20.9	5.4	13.5	42.0	28.8	42.9	34.0	64.1	41.9	0.0	1.6	0.3
Total	184	75,535	100.0	318,440	3.1	0.0	1.5	20.9	5.4	13.5	42.0	28.8	42.9	34.0	64.1	41.9	0.0	1.6	0.3

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing 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
Arizona AA	363	139,787	100.0	293,499	3.7	3.0	3.0	20.4	10.5	15.5	39.7	28.9	41.0	36.2	57.6	40.2	0.0	0.0	0.3
Total	363	139,787	100.0	293,499	3.7	3.0	3.0	20.4	10.5	15.5	39.7	28.9	41.0	36.2	57.6	40.2	0.0	0.0	0.3

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Arizona AA	184	75,535	100.0	318,440	21.1	1.1	4.1	18.0	5.4	13.3	20.3	16.8	18.7	40.7	76.6	40.2	0.0	0.0	23.7
Total	184	75,535	100.0	318,440	21.1	1.1	4.1	18.0	5.4	13.3	20.3	16.8	18.7	40.7	76.6	40.2	0.0	0.0	23.7

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Arizona AA	363	139,787	100.0	293,499	21.8	1.4	4.9	17.4	12.7	14.7	19.6	14.3	20.9	41.2	71.1	39.6	0.0	0.6	20.0
Total	363	139,787	100.0	293,499	21.8	1.4	4.9	17.4	12.7	14.7	19.6	14.3	20.9	41.2	71.1	39.6	0.0	0.6	20.0

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Arizona AA	79	2,560	100.0	170,163	5.5	7.6	5.3	17.4	8.9	15.7	34.4	41.8	32.7	42.3	41.8	46.0	0.4	0.0	0.3
Total	79	2,560	100.0	170,163	5.5	7.6	5.3	17.4	8.9	15.7	34.4	41.8	32.7	42.3	41.8	46.0	0.4	0.0	0.3

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Arizona AA	170	6,140	215.2	135,217	5.6	4.1	6.0	18.2	24.1	18.6	32.5	38.2	31.5	43.2	32.9	43.4	0.6	0.6	0.6
Total	170	6,140	215.2	135,217	5.6	4.1	6.0	18.2	24.1	18.6	32.5	38.2	31.5	43.2	32.9	43.4	0.6	0.6	0.6

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Arizona AA	79	2,560	100.0	170,163	86.7	84.8	41.5	4.4	15.2	9.0	0.0	
Total	79	2,560	100.0	170,163	86.7	84.8	41.5	4.4	15.2	9.0	0.0	
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. 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	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Arizona AA	79	2,433	100.0	135,217	87.0	83.5	50.4	4.3	16.5	8.6	0.0	
Total	79	2,433	100.0	135,217	87.0	83.5	50.4	4.3	16.5	8.6	0.0	
<i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Tables of Lending Performance Data

State of California

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
California AA	1,966	1,617,123	100.0	1,456,893	2.8	4.1	2.6	17.6	11.2	15.6	37.4	23.0	36.9	42.2	60.8	44.9	0.0	0.9	0.0
Total	1,966	1,617,123	100.0	1,456,893	2.8	4.1	2.6	17.6	11.2	15.6	37.4	23.0	36.9	42.2	60.8	44.9	0.0	0.9	0.0

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing 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
California AA	3,538	3,493,263	100.0	1,110,285	3.0	4.2	3.4	17.9	12.4	18.4	34.5	20.7	34.7	44.6	59.1	43.3	0.1	3.6	0.2
Total	3,538	3,493,263	100.0	1,110,285	3.0	4.2	3.4	17.9	12.4	18.4	34.5	20.7	34.7	44.6	59.1	43.3	0.1	3.6	0.2

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
California AA	1,966	1,617,123	100.0	1,456,893	22.8	0.8	2.0	17.0	2.8	8.2	18.9	9.4	17.9	41.3	74.4	55.5	0.0	12.6	16.3
Total	1,966	1,617,123	100.0	1,456,893	22.8	0.8	2.0	17.0	2.8	8.2	18.9	9.4	17.9	41.3	74.4	55.5	0.0	12.6	16.3

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
California AA	3,538	3,493,263	100.0	1,110,285	23.8	1.0	2.7	16.5	3.9	9.3	17.9	7.7	19.1	41.8	72.7	54.8	0.0	14.7	14.2
Total	3,538	3,493,263	100.0	1,110,285	23.8	1.0	2.7	16.5	3.9	9.3	17.9	7.7	19.1	41.8	72.7	54.8	0.0	14.7	14.2

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
California AA	1,060	69,735	100.0	1,342,945	6.4	7.1	5.1	19.7	26.2	17.8	33.4	34.8	33.1	39.9	31.3	43.6	0.5	0.6	0.4
Total	1,060	69,735	100.0	1,342,945	6.4	7.1	5.1	19.7	26.2	17.8	33.4	34.8	33.1	39.9	31.3	43.6	0.5	0.6	0.4

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
California AA	2,489	135,476	100.0	1,008,766	6.0	7.6	5.4	20.1	25.3	19.5	30.9	31.5	30.6	42.0	34.7	43.6	1.1	1.0	0.8
Total	2,489	135,476	100.0	1,008,766	6.0	7.6	5.4	20.1	25.3	19.5	30.9	31.5	30.6	42.0	34.7	43.6	1.1	1.0	0.8

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
California AA	1,060	69,735	100.0	1,342,945	86.2	62.2	42.0	5.7	37.8	8.1	0.0	
Total	1,060	69,735	100.0	1,342,945	86.2	62.2	42.0	5.7	37.8	8.1	0.0	
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
California AA	2,489	135,476	100.0	1,008,766	86.1	67.4	52.0	5.6	32.6	8.3	0.0	
Total	2,489	135,476	100.0	1,008,766	86.1	67.4	52.0	5.6	32.6	8.3	0.0	
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Tables of Lending Performance Data

State of Florida

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Florida AA	212	146,858	100.0	632,898	1.5	0.0	0.8	19.3	5.7	13.8	47.0	31.1	46.8	32.2	63.2	38.5	0.0	0.0	0.0
Total	212	146,858	100.0	632,898	1.5	0.0	0.8	19.3	5.7	13.8	47.0	31.1	46.8	32.2	63.2	38.5	0.0	0.0	0.0

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing 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
Florida AA	339	188,448	100.0	638,534	1.9	1.2	1.3	19.5	11.2	16.3	44.4	25.1	44.7	34.2	62.2	37.6	0.1	0.3	0.1
Total	339	188,448	100.0	638,534	1.9	1.2	1.3	19.5	11.2	16.3	44.4	25.1	44.7	34.2	62.2	37.6	0.1	0.3	0.1

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Florida AA	212	146,858	100.0	632,898	20.8	0.5	3.5	18.2	1.9	12.9	20.3	4.7	19.3	40.7	89.6	46.6	0.0	3.3	17.6
Total	212	146,858	100.0	632,898	20.8	0.5	3.5	18.2	1.9	12.9	20.3	4.7	19.3	40.7	89.6	46.6	0.0	3.3	17.6

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Florida AA	339	188,448	247.4	638,534	21.5	0.3	3.8	17.9	5.3	13.5	19.4	11.2	20.5	41.3	80.5	44.9	0.0	2.7	17.3
Total	339	188,448	247.4	638,534	21.5	0.3	3.8	17.9	5.3	13.5	19.4	11.2	20.5	41.3	80.5	44.9	0.0	2.7	17.3

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2016

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Florida AA	515	25,792	100.0	578,572	2.8	4.3	2.7	20.4	24.9	19.3	39.2	35.7	36.5	37.2	34.8	41.0	0.4	0.4	0.4
Total	515	25,792	100.0	578,572	2.8	4.3	2.7	20.4	24.9	19.3	39.2	35.7	36.5	37.2	34.8	41.0	0.4	0.4	0.4

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Florida AA	1,234	57,901	100.0	548,987	3.4	4.5	3.6	20.9	24.9	20.6	36.9	36.9	35.1	38.3	33.2	40.0	0.5	0.5	0.6
Total	1,234	57,901	100.0	548,987	3.4	4.5	3.6	20.9	24.9	20.6	36.9	36.9	35.1	38.3	33.2	40.0	0.5	0.5	0.6

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Florida AA	515	25,792	100.0	578,572	89.7	70.5	48.0	3.7	29.5	6.6	0.0	
Total	515	25,792	100.0	578,572	89.7	70.5	48.0	3.7	29.5	6.6	0.0	
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Florida AA	1,234	57,901	100.0	548,987	89.7	73.3	52.0	3.8	26.7	6.5	0.0	
Total	1,234	57,901	100.0	548,987	89.7	73.3	52.0	3.8	26.7	6.5	0.0	
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Tables of Lending Performance Data

State of New York

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
New York AA	155	160,512	100.0	309,096	2.6	7.7	2.6	13.3	13.5	12.7	49.7	20.6	48.7	34.5	58.1	35.9	0.0	0.0	0.0	
Total	155	160,512	100.0	309,096	2.6	7.7	2.6	13.3	13.5	12.7	49.7	20.6	48.7	34.5	58.1	35.9	0.0	0.0	0.0	

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing 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	
New York AA	297	321,027	100.0	296,057	2.9	5.1	3.1	13.0	12.8	13.6	49.3	24.6	48.5	34.7	57.2	34.7	0.1	0.3	0.1	
Total	297	321,027	100.0	296,057	2.9	5.1	3.1	13.0	12.8	13.6	49.3	24.6	48.5	34.7	57.2	34.7	0.1	0.3	0.1	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
New York AA	155	160,512	100.0	309,096	24.3	0.6	4.8	17.1	1.3	15.1	19.5	7.7	22.1	39.1	83.9	43.7	0.0	6.5	14.4
Total	155	160,512	100.0	309,096	24.3	0.6	4.8	17.1	1.3	15.1	19.5	7.7	22.1	39.1	83.9	43.7	0.0	6.5	14.4

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
New York AA	297	321,027	212.1	296,057	25.4	0.7	5.1	16.4	4.7	15.6	18.6	6.7	22.3	39.6	82.8	43.5	0.0	5.1	13.5
Total	297	321,027	212.1	296,057	25.4	0.7	5.1	16.4	4.7	15.6	18.6	6.7	22.3	39.6	82.8	43.5	0.0	5.1	13.5

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
New York AA	557	24,618	100.0	492,547	7.0	4.7	7.4	17.0	19.7	16.9	38.3	39.7	36.2	36.3	34.3	38.0	1.4	1.6	1.4	
Total	557	24,618	100.0	492,547	7.0	4.7	7.4	17.0	19.7	16.9	38.3	39.7	36.2	36.3	34.3	38.0	1.4	1.6	1.4	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
New York AA	1,472	72,142	100.0	481,909	7.5	8.2	8.4	16.0	19.6	16.5	36.5	41.8	33.3	38.5	29.1	40.5	1.6	1.3	1.3	
Total	1,472	72,142	100.0	481,909	7.5	8.2	8.4	16.0	19.6	16.5	36.5	41.8	33.3	38.5	29.1	40.5	1.6	1.3	1.3	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
New York AA	557	24,618	100.0	492,547	84.3	73.3	43.0	6.8	26.8	8.8	0.0	
Total	557	24,618	100.0	492,547	84.3	73.3	43.0	6.8	26.8	8.8	0.0	
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
New York AA	1,472	72,142	100.0	481,909	84.6	69.8	49.3	6.7	30.2	8.8	0.0	
Total	1,472	72,142	100.0	481,909	84.6	69.8	49.3	6.7	30.2	8.8	0.0	
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Tables of Lending Performance Data

State of Ohio

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Ohio AA	33	5,474	100.0	330,049	3.7	0.0	1.8	15.5	6.1	11.5	49.7	21.2	46.1	31.2	72.7	40.6	0.0	0.0	0.0	
Total	33	5,474	100.0	330,049	3.7	0.0	1.8	15.5	6.1	11.5	49.7	21.2	46.1	31.2	72.7	40.6	0.0	0.0	0.0	

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing 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	
Ohio AA	57	9,214	100.0	302,302	4.2	7.0	2.8	15.8	5.3	14.4	48.2	31.6	46.2	31.7	56.1	36.6	0.1	0.0	0.1	
Total	57	9,214	100.0	302,302	4.2	7.0	2.8	15.8	5.3	14.4	48.2	31.6	46.2	31.7	56.1	36.6	0.1	0.0	0.1	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Ohio AA	33	5,474	100.0	330,049	20.8	3.0	6.7	17.7	6.1	17.3	21.2	9.1	20.0	40.3	81.8	37.8	0.0	0.0	18.1	
Total	33	5,474	100.0	330,049	20.8	3.0	6.7	17.7	6.1	17.3	21.2	9.1	20.0	40.3	81.8	37.8	0.0	0.0	18.1	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Ohio AA	57	9,214	178.1	302,302	21.8	1.8	7.7	17.2	14.0	19.4	20.2	29.8	21.5	40.8	54.4	35.6	0.0	0.0	15.8	
Total	57	9,214	178.1	302,302	21.8	1.8	7.7	17.2	14.0	19.4	20.2	29.8	21.5	40.8	54.4	35.6	0.0	0.0	15.8	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Ohio AA	71	1,638	100.0	176,784	6.3	1.4	5.4	17.0	25.4	15.4	43.3	45.1	40.5	33.3	28.2	38.6	0.2	0.0	0.1	
Total	71	1,638	100.0	176,784	6.3	1.4	5.4	17.0	25.4	15.4	43.3	45.1	40.5	33.3	28.2	38.6	0.2	0.0	0.1	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Ohio AA	227	6,532	231.6	170,077	7.0	8.4	7.6	17.2	16.7	15.4	40.7	47.1	38.8	34.5	27.3	37.7	0.6	0.4	0.5	
Total	227	6,532	231.6	170,077	7.0	8.4	7.6	17.2	16.7	15.4	40.7	47.1	38.8	34.5	27.3	37.7	0.6	0.4	0.5	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Ohio AA	71	1,638	100.0	176,784	80.6	87.3	43.7	6.8	12.7	12.6	0.0	
Total	71	1,638	100.0	176,784	80.6	87.3	43.7	6.8	12.7	12.6	0.0	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Ohio AA	227	6,532	100.0	170,077	80.3	89.9	48.8	6.8	10.1	12.9	0.0	
Total	227	6,532	100.0	170,077	80.3	89.9	48.8	6.8	10.1	12.9	0.0	

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

Tables of Lending Performance Data

State of Texas

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Texas AA	129	35,031	100.0	809,443	3.5	2.3	1.7	19.7	4.7	11.0	39.7	25.6	36.1	37.1	67.4	51.2	0.0	0.0	0.0	
Total	129	35,031	100.0	809,443	3.5	2.3	1.7	19.7	4.7	11.0	39.7	25.6	36.1	37.1	67.4	51.2	0.0	0.0	0.0	

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing 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	
Texas AA	305	72,586	100.0	755,116	3.7	2.6	2.1	19.8	8.2	12.8	38.0	28.9	36.1	38.4	60.0	48.9	0.1	0.3	0.1	
Total	305	72,586	100.0	755,116	3.7	2.6	2.1	19.8	8.2	12.8	38.0	28.9	36.1	38.4	60.0	48.9	0.1	0.3	0.1	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Texas AA	129	35,031	100.0	809,443	22.8	0.8	2.9	16.9	6.2	10.8	18.7	10.9	17.9	41.6	81.4	48.3	0.0	0.8	20.2
Total	129	35,031	100.0	809,443	22.8	0.8	2.9	16.9	6.2	10.8	18.7	10.9	17.9	41.6	81.4	48.3	0.0	0.8	20.2

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Texas AA	305	72,586	100.0	755,116	23.2	1.3	3.4	16.8	10.5	12.0	18.3	20.7	19.5	41.7	66.9	46.9	0.0	0.7	18.2
Total	305	72,586	100.0	755,116	23.2	1.3	3.4	16.8	10.5	12.0	18.3	20.7	19.5	41.7	66.9	46.9	0.0	0.7	18.2

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2016**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Texas AA	489	26,502	100.0	561,097	6.2	7.4	6.0	19.2	21.5	18.0	33.3	37.0	31.5	41.1	33.9	44.3	0.2	0.2	0.1
Total	489	26,502	100.0	561,097	6.2	7.4	6.0	19.2	21.5	18.0	33.3	37.0	31.5	41.1	33.9	44.3	0.2	0.2	0.1

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Texas AA	1,356	63,554	100.0	538,230	6.5	8.0	6.5	19.6	24.9	19.1	32.2	33.9	31.5	41.3	32.9	42.5	0.4	0.4	0.4
Total	1,356	63,554	100.0	538,230	6.5	8.0	6.5	19.6	24.9	19.1	32.2	33.9	31.5	41.3	32.9	42.5	0.4	0.4	0.4

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Texas AA	489	26,502	100.0	561,097	84.2	76.7	41.4	5.3	23.3	10.5	0.0
Total	489	26,502	100.0	561,097	84.2	76.7	41.4	5.3	23.3	10.5	0.0
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Texas AA	1,356	63,554	100.0	538,230	84.4	75.8	45.7	5.2	24.2	10.4	0.0
Total	1,356	63,554	100.0	538,230	84.4	75.8	45.7	5.2	24.2	10.4	0.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											