



PUBLIC DISCLOSURE

August 19, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

West Valley National Bank
Charter Number 24683

2440 North Litchfield Road, Suite 100
Goodyear, AZ 85395

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

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated Satisfactory.

The lending test is rated: Satisfactory.

West Valley National Bank’s (WVNB or bank) lending performance reflects satisfactory responsiveness to community credit needs. The major factors that support this rating include:

- The bank’s loan-to-deposit (LTD) ratio is reasonable given the bank’s size, financial condition, and assessment area (AA) credit needs.
- The bank originated a substantial majority of loans inside its AA.
- The geographic distribution of loans reflects reasonable distribution throughout the bank’s AA.
- Lending activities represent reasonable distribution among businesses of different sizes.

Loan-to-Deposit Ratio

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

We analyzed the bank’s quarterly average LTD ratio for the 16 quarters since the previous CRA examination through December 31, 2018. WVNB’s average LTD ratio for this period was 72 percent, with a high of 83 percent and a low of 58 percent. For purposes of comparison, we selected four banks that WVNB considers direct competitors for loans and deposits. The combined average quarterly LTD ratio for these institutions over the same period was 81 percent. Their average LTD ratios ranged from a high of 92 percent to a low of 69 percent.

Lending in Assessment Area

A substantial majority of the bank’s loans are inside its assessment area. We calculated the percentage of loans inside the bank’s AA from a sample of 40 commercial loans. With 83 percent of the number and 63 percent of the dollar amount of loans, WVNB’s inside/outside ratio reflects a substantial majority of the primary loan product originated inside the AA. Lending in the Maricopa County AA is more than reasonable and exceeds the standard for satisfactory performance.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%	\$	%	\$	%		
Commercial Loans	33	83	7	18	40	6,607	63	3,862	37	10,469

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

Description of Institution

West Valley National Bank is an independent, full-service community bank headquartered in Goodyear, Arizona. WVNB opened for business in December 2006. The bank is a wholly owned subsidiary of West Valley Bancorp, Inc., (WVB) a privately owned, one-bank holding company located in Goodyear, Arizona. As of June 30, 2019, WVB reported total assets of \$7.7 million. The bank has no affiliate relationships. As of June 30, 2019, WVNB reported total assets of \$70.2 million, total loans of \$41.4 million, total deposits of \$62.5 million, and total equity capital of \$7.4 million. Total loans represented approximately 59.0 percent of total assets.

WVNB has designated Maricopa County as its AA. The county makes up a portion of the Phoenix-Mesa-Scottsdale, Arizona Metropolitan Statistical Area (MSA) and includes 916 census tracts (CTs). The AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income (LMI) geographies. The bank operated three full service branches prior to January 2019, when the Nevada branch opened. The main branch is located in Goodyear, Arizona, in an upper-income CT. The Phoenix branch is located in a middle-income CT and the Gila Bend branch is located in a low-income CT. During 2017, the bank opened the branch in Phoenix and closed the Buckeye and Scottsdale branches. The Gila Bend Branch is the only branch with a deposit taking Automatic Teller Machine (ATM). However, to help serve their customers, the bank has an agreement with US Bank and its MoneyPass ATM network allowing use of their ATMs free of charge, which includes the ability to make deposits.

WVNB's primary focus is offering loan products to meet the needs of small- and medium- size businesses. Types of loans include commercial real estate, commercial and industrial, and Small Business Administration (SBA) lending.

The bank was rated Satisfactory at the April 20, 2015 CRA examination. There are no financial or legal impediments that impede the bank's ability to help meet the credit needs of the AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assesses the Community Reinvestment Act (CRA) performance of West Valley National Bank, using Small Bank CRA examination procedures. We performed a full-scope examination of the bank's sole assessment area, the Maricopa County AA. For the lending test we determined the bank's primary product is commercial loans. Refer to appendix A for detailed information.

We sampled 40 commercial loans originated, renewed, or purchased from January 1, 2016 through December 31, 2018 to calculate the inside/outside AA ratio. To perform other lending tests, we eliminated loans outside the AA from the inside/outside AA sample and added enough additional loans to provide a sample of 40 commercial loans originated inside the AA from January 1, 2016 through December 31, 2018. The sample is representative of the bank's business strategy since the last examination.

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

Selection of Areas for Full-Scope Review

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

Ratings

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

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

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

State Rating

State of Arizona

CRA rating for the State of Arizona: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the bank's AA.
- Lending activities represent reasonable distribution among businesses of different sizes.

Description of Institution's Operations in Arizona

Maricopa County

WVNB has designated Maricopa County as its AA. The county makes up a portion of the Phoenix-Mesa-Scottsdale, Arizona Metropolitan Statistical Area (MSA) and includes 916 CTs: 105 are low-income; 206 are moderate-income; 286 are middle-income; and 306 are upper-income. In addition, 13 CTs do not report data and are listed as unknown. The AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income (LMI) geographies. Through December 31, 2018, the bank was a single state institution with the main office located in Goodyear, Arizona, in an upper-income CT. The Phoenix branch is located in a middle-income CT and the Gila Bend branch is located in a low-income CT. During 2017, the bank opened the branch in Phoenix and closed the Buckeye and Scottsdale branches. The Gila Bend branch is the only branch with a deposit taking Automatic Teller Machine (ATM), however, to help serve their customers, the bank has an agreement with US Bank and its MoneyPass ATM network allowing use of their ATMs free of charge, which includes the ability to make deposits.

WVNB's primary focus is offering loan products to meet the needs of small- and medium- size businesses. Types of loans include commercial real estate, commercial and industrial, and Small Business Administration lending. The bank offers traditional services at all three of its branches.

Competition in the Maricopa County AA is strong, the FDIC Deposit Market Share report indicates as of June 30, 2018, WVNB's deposits inside the AA are \$55.1 million and ranks 47th in deposit market share with 0.06 percent of the AA's deposits. A total of 60 financial institutions, with a combined 776 branches, competed for over \$98.2 billion of insured deposits in Maricopa County. This includes three nationwide mega-banks with 408 branches that account for 65 percent of the deposit market share, representing \$64.2 billion in deposits.

We reviewed a recent community contact and interviewed a new contact servicing the Maricopa County AA. The contact alluded to an overall economic slump that is slowly recovering for LMI individuals in Maricopa County. They also identified affordable housing,

access to food, and the need for affordable health care as the primary needs in this AA. The contact stated banks are receptive to the community’s needs and they donate when they can, but donations are limited to bank employees who volunteer, join boards, or meet with leadership when requested. Banks also present financial wellness and how to avoid predatory lending workshops. They also guide entrepreneurs on how to get started and direct them to Community Development Financial Institutions (CDFI) for funding.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Maricopa County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	916	11.5	22.5	31.2	33.4	1.4
Population by Geography	4,018,143	11.1	22.9	31.3	34.4	0.3
Housing Units by Geography	1,668,555	9.8	23.4	33.3	33.4	0.1
Owner-Occupied Units by Geography	875,327	4.6	18.8	34.7	41.9	0.0
Occupied Rental Units by Geography	567,191	17.1	29.4	31.2	21.9	0.3
Vacant Units by Geography	226,037	11.8	25.6	33.2	29.3	0.2
Businesses by Geography	338,459	6.6	16.3	28.3	48.3	0.6
Farms by Geography	6,517	5.7	18.4	29.6	45.9	0.3
Family Distribution by Income Level	945,115	21.8	16.9	19.2	42.2	0.0
Household Distribution by Income Level	1,442,518	23.3	16.3	17.7	42.7	0.0
Median Family Income MSA - 38060 Phoenix-Mesa-Scottsdale, AZ MSA		\$63,686	Median Housing Value			\$203,811
			Median Gross Rent			\$993
			Families Below Poverty Level			12.6%
<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>						

Scope of Evaluation in Arizona

The CRA evaluation determines the bank’s record of meeting community credit needs. The OCC used a combination of bank and examiner generated loan and/or demographic reports to assess the bank’s CRA performance. Consistent with WVNB’s business strategy, the bank’s primary product by dollar and number is commercial loans. The evaluation period for the lending test is January 1, 2016 through December 31, 2018. Examiners placed greater weight on performance in 2017 and 2018 since this is based on more recently updated ACS Census data.

LENDING TEST

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

Based on a full-scope review, the bank’s lending performance in the state of Arizona is Satisfactory.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the AA.

Small Loans to Businesses

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

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

For 2017-18, the bank did not make any small business loans in the low-income CTs, representing poor distribution. The demographic percentage of AA businesses in low-income CTs is 6.6 percent and the aggregate lending in this area was 7.1 percent. In 2016, the bank originated 10.0 percent of small business loans in low-income CTs, well above the 6.5 demographic percentage of AA businesses and 6.4 percent aggregate lending. This reflects excellent distribution.

In 2017-18, the bank originated 15.0 percent of small business loans in moderate-income CTs, very near to the 16.3 demographic percentage of AA businesses, and 16.7 percent of aggregate lending in moderate-income CTs. This represents reasonable distribution. For 2016, the bank originated 10.0 percent of small business loans in moderate-income CTs. This was slightly less than the 15.4 demographic percentage of AA businesses and 14.2 percent of aggregate lending in moderate-income CTs. This represents reasonable distribution.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

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

Overall, the distribution of small business loans reflects reasonable penetration to businesses of different sizes in the Maricopa County AA.

For 2017-18, while the 50.0 percent of loans originated by the bank to businesses with revenues less than or equal to \$1.0 million is below the 87.7 percent of small businesses in the AA demographics, it meets the 50.6 aggregate lending percentage and reflects reasonable distribution. The AA demographic indicates that a number of businesses with revenues less than or equal to \$1 million do not seek out lending opportunities.

For 2016, while the 60.0 percent of loans originated by the bank to businesses with revenues less than or equal to \$1.0 million is below the 87.3 percent of small businesses in the AA demographics, it is well above the 41.4 aggregate lending percentage and reflects reasonable distribution. The AA demographic indicates that a number of businesses with revenues less than or equal to \$1.0 million do not seek out lending opportunities.

Appendix A: Scope of Examination

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

Time Period Reviewed:	1/1/2016 to 12/31/2018	
Bank Products Reviewed:	Small business loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Arizona		
Maricopa County	Full-scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS	West Valley National Bank
Overall Bank:	Lending Test Rating
West Valley National Bank	Satisfactory
MMSA or State:	
Arizona	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

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

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

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

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

Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table 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			
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Maricopa County AA	20	5,227	100.0	95,510	6.6	0.0	7.1	16.3	15.0	16.7	28.3	30.0	27.0	48.3	55.0	48.5	0.6	0.0	0.6	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Maricopa County AA	20	3,332	100.0	119,871	6.5	10.0	6.4	15.4	10.0	14.2	29.4	25.0	26.9	48.1	55.0	52.1	0.6	0.0	0.4	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues ≤ 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Maricopa County AA	20	5,227	100.0	95,510	87.7	50.0	50.6	4.3	45.0	7.9	5.0	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues ≤ 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Maricopa County AA	20	3,332	100.0	119,871	87.3	60.0	41.4	4.5	40.0	8.2	0.0	

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