



PUBLIC DISCLOSURE

July 31, 2023

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

New Omni Bank, National Association
Charter Number 16840

1235 South Garfield Avenue
Alhambra, CA 91801

Office of the Comptroller of the Currency

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

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

- **The lending test is rated:** Satisfactory.
- **The community development test is rated:** Satisfactory.

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

- The Lending Test rating is based on the bank's record of performance in meeting the credit needs of its assessment area (AA) during the evaluation period through its lending activities.
 - The loan-to-deposit (LTD) ratio is more than reasonable given the bank's size, financial condition, and business strategy.
 - The bank originated a majority of its loans inside its AA.
 - The geographic distribution of loans reflects excellent distribution throughout the bank's AA.
 - Lending activities represent reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The Community Development (CD) Test rating is based on the aggregate assessment of the bank's community development activities for loans, investments, and services in its AA.
 - The bank's CD activities demonstrate an adequate level of responsiveness based on available opportunities in the AA during the evaluation period.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, business strategy, and credit needs of the AA, the bank's loan-to-deposit ratio is more than reasonable. The quarterly average LTD ratio for the previous 12 quarters ending December 31, 2022 was 101 percent, with a high of 109 percent and a low of 97 percent.

NOB's average LTD ratio compares favorably to other financial institutions of similar size, AA demographics, and lending products. For purposes of comparison, we selected four banks that NOB considers direct competitors for loans and deposits in its AA. The combined quarterly average LTD ratio for these institutions over the same period was 94 percent. Their average LTD ratios ranged from a high of 103 percent to a low of 85 percent.

Lending in Assessment Area

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

NOB originated and purchased 69.5 percent of the number and 65.7 percent of the total dollar volume of loans inside its AA during the evaluation period and meets the standard for satisfactory performance. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. Lending test conclusions are based upon loans originated and purchased inside the bank's AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2020	38	43.2	50	56.8	88	46,385	52.8	41,437	47.2	87,822
2021	50	62.5	30	37.5	80	48,597	73.4	17,647	26.6	66,244
2022	49	86.0	8	14.0	57	58,996	93.4	4,145	6.6	63,141
Subtotal	137	60.9	88	39.1	225	153,978	70.9	63,229	29.1	217,207
Small Business										
2020	204	67.1	100	32.9	304	85,399	50.5	83,719	49.5	169,118
2021	235	74.6	80	25.4	315	92,167	60.2	60,958	39.8	153,125
2022	51	87.9	7	12.1	58	93,692	87.2	13,814	12.9	107,506
Subtotal	490	72.4	187	27.6	677	271,258	63.1	158,491	36.9	429,749
Total	627	69.5	275	30.5	902	425,236	65.7	221,720	34.3	646,956

Source: Evaluation Period: 1/1/2020 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0.

Description of Institution

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

From January 1, 2020, through June 24, 2021, the bank's designated AA was the Los Angeles-Long Beach-Glendale Metropolitan Division (MD), which is comprised entirely of Los Angeles County. Effective June 25, 2021, the bank expanded its AA to include portions of the Los Angeles-Long Beach Combined Statistical Area (CSA), which includes the Los Angeles-Long Beach-Anaheim Metropolitan Statistical Area (MSA), the Oxnard-Thousand Oaks-Ventura MSA, and the Riverside San Bernardino-Ontario MSA. Specifically, the bank's AA now includes Los Angeles County, Orange County, and San Bernardino County. The counties are contiguous, and the bank can reasonably service them all.

NOB maintains three full-service branches, all located in Los Angeles County, California. The main branch is located in Alhambra, in a moderate-income census tract (CT). The second branch is in a middle-income CT located in Rowland Heights. The third branch is located in Arcadia, in an upper-income CT. No branches were opened or closed during the evaluation period.

The bank offers a variety of traditional banking products to consumer and commercial customers. Deposit products include personal and business checking, savings accounts, certificates of deposit, and money market accounts. Loan products include commercial real estate, commercial and industrial, Small Business Administration (SBA) lending, multifamily, residential mortgages, and consumer auto loans. The bank does not operate automated teller machines (ATMs) or drive-up teller access but does offer

night depository services at the Alhambra and Rowland Heights branches. NOB also offers various alternative banking services, including telephone banking, online banking, direct deposit, bill payment, remote deposit capture (RDC), and Automated Clearing House (ACH) services.

As of December 31, 2022, NOB reported total assets of \$549.9 million, with loans totaling \$394.5 million, or 71.7 percent of total assets. Total deposits were \$401.8 million, and common equity tier 1 capital totaled \$125.9 million. The following table provides a summary of the bank's loan portfolio by major product type.

New Omni Bank, N.A. Loan Portfolio by Major Product Type as of December 31, 2022		
Loan Type	(\$000's)	% of Portfolio
Commercial Real Estate	182,800	46.3%
Residential Real Estate	166,510	42.2%
Small Business Administration	22,239	5.6%
Construction	19,969	5.1%
Commercial & Industrial	2,764	0.7%
Consumer - Auto	243	0.1%
Total	394,525	100.0%

There are no legal, financial, or other factors that impede the bank's ability to meet the credit needs of its community. NOB received a "Satisfactory" rating under the intermediate small bank (ISB) CRA procedures at the prior CRA examination dated May 26, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assesses the CRA performance of New Omni Bank, N.A. using ISB CRA procedures. This included an evaluation of CRA activities under the Lending Test criteria, as well as an evaluation of activities under the Community Development Test. We performed a full-scope examination of the bank's sole AA. Refer to appendix A for detailed information.

Consistent with NOB's business strategy, OCC examiners reviewed the bank's two primary lending products, loans to small businesses and home mortgage loan originations. This evaluation also included an assessment of the bank's CD lending, investments and donations, and services activities. The evaluation period for both the lending test and CD test was January 1, 2020 through December 31, 2022.

With an evaluation period end date of December 31, 2022, bank qualifying activities performed in response to the significant impact the COVID-19 pandemic has had on economies across the United States are addressed in this evaluation. This includes the more than 482 PPP loans the bank originated in 2020 and 2021. The bank originated all their PPP loans in California, the majority in Los Angeles County, which was their AA at that time.

Due to the Census data changing during the evaluation period, we compared 2015 American Community Survey (ACS) Census data to loans originated from January 1, 2020 through

December 31, 2021, and 2020 U.S. Census data to loans originated from January 1, 2022 through December 31, 2022.

Selection of Areas for Full-Scope Review

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

Ratings

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

NOB has only one AA. All weighting for the evaluation is placed on the one AA. Consistent with NOB’s business strategy, OCC examiners placed more weight on the bank’s primary product of loans to small businesses. However, in assessing the bank’s distribution of home mortgage loans to low- and moderate-income (LMI) borrowers, more weight was placed on the bank’s performance compared to the aggregate and less weight on the performance compared to the demographics. This is due to the high cost of housing in the more populated areas within the AA, which impacted the availability of affordable homes for LMI individuals and families and reduced the opportunities for home purchase lending for all lenders during the review period.

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

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of California

CRA rating for the State of California: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution throughout the bank's AA.
- Lending activities represent reasonable distribution of loans to individuals of different income levels and borrowers of different sizes.
- NOB's aggregate level of responsiveness to CD needs is adequate.

Description of Institution's Operations in California

NOB Assessment Area

New Omni Bank, N.A. designated the Los Angeles-Long Beach-Glendale MD, which is entirely made up of Los Angeles County, as their AA from January 1, 2020, through June 24, 2021. Effective June 25, 2021, the bank expanded its AA to include portions of the Los Angeles-Long Beach CSA, which includes the Los Angeles-Long Beach-Anaheim MSA, the Oxnard-Thousand Oaks-Ventura MSA and the Riverside-San Bernardino-Ontario MSA. Specifically, the bank's designated AA now includes the contiguous counties of Los Angeles, Orange, and San Bernardino.

The bank's designated AA consists of 3,578 CTs: 207 low-income; 1,010 moderate-income; 1,098 middle-income; and 1,175 upper-income. In addition, 88 CTs do not report data and are listed as unknown. The AA meets the regulation requirements and does not arbitrarily exclude low- and moderate-income (LMI) geographies. According to the 2020 U.S. Census, the AA has a total population of 15 million. Population decline is minimal, with the average experiencing net migration outflow for the three counties experiencing 0.5 percent or less in net migration outflow, primarily of people moving from a county within the AA to another county within the AA.

Los Angeles County

Per the Moody's Analytics report dated May 2023, the Los Angeles County economy benefits from economic drivers in the tourism, logistics, and medical sectors. The healthcare and leisure/hospitality industries are leading job gains in the county. The unemployment rate rose sharply in 2020 due to the COVID-19 pandemic and significantly declined in 2021-2022, and has returned to pre-pandemic levels. Market strengths include a solid healthcare base and a growing tech presence, well-paying jobs, global links through entertainment, tourism, and fashion, and the San Pedro Harbor, which enables the county to handle mega-ships that other ports cannot. Weaknesses include high costs, which hinders net migration gains, and the area is prone to disasters, including drought, wildfires, and earthquakes. Top employers include the University of California (Los Angeles), Cedars-Sinai Medical Center, and the Los Angeles Airport. Key industries include entertainment, medical, and professional and business services. Average annual earnings are higher in Los Angeles compared to California and the U.S. Still, housing

affordability lags behind the California and U.S. averages, making homebuying further out of reach, especially for LMI individuals and families.

Orange County

The Moody's Analytics report dated May 2023 shows that the Orange County economy benefits from the technology and tourism sectors. Leisure/hospitality and healthcare lead job gains, and tech layoffs have been less damaging than in the Bay Area. The unemployment rate rose sharply in 2020 due to the COVID-19 pandemic and significantly declined in 2021-2022, and has returned to pre-pandemic levels. Market strengths include a highly educated and skilled workforce, Research and Development clusters underpinning a healthy demand for office space, and a warm climate that attracts residents and visitors. Weaknesses include a contracting population, an abundance of low-wage jobs, and sensitivity to business cycle fluctuations, which hinders net migration gains. Top employers include the University of California (Irvine), Disneyland Resorts, and Kaiser Permanente. Key industries include professional and business services, education and health services, and leisure and hospitality. Average annual earnings are higher in Orange County compared to California and the U.S., but housing affordability continues to lag behind the California and U.S. averages, making homebuying further out of reach, especially for LMI individuals and families.

San Bernardino County

Per the Moody's Analytics report dated May 2023, the San Bernadino County economy benefits from economic drivers in the logistics and defense sectors. Job growth has slowed, but healthcare and local government are keeping total employment steady. The unemployment rate rose sharply in 2020 due to the COVID-19 pandemic and significantly declined in 2021-2022, and has returned to pre-pandemic levels. Market strengths include lower business and housing costs compared to nearby coastal counties and a younger population due to positive net migration. Weaknesses include a lack of a vibrant central core, a shortage of high-wage industries, and low educational attainment. Top employers include Stater Brothers, Arrowhead Medical Center, and the U.S. Government. Key industries include professional and business services, education and health services, government, and retail. Average annual earnings are lower in San Bernardino compared to California and the U.S. in general. Still, housing affordability is higher than California averages but lower than U.S. averages, making homebuying more feasible compared to nearby southern California coastal counties, especially for LMI individuals and families.

The bank's business strategy consists of providing community banking activities that serve consumers and commercial customers. NOB offers a full range of deposit and loan products and banking services, through three branches all located in Los Angeles County.

Competition from other financial institutions is strong in the bank's AA. As of June 30, 2022, the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report indicates the bank's deposits inside the AA totaled \$402 million and ranks 70th with a market share of 0.05 percent. A total of 113 financial institutions, with a combined 2,363 branches, competed for approximately \$834 billion of insured deposits within the AA. The competition includes three nationwide mega-banks with a combined 1,070 branches that account for 48 percent of the deposit market share, representing \$402 billion in deposits.

To assess community needs, we used information from recent interviews with four community organizations providing services in the Los Angeles and surrounding areas. The contacts included a community development corporation, two community housing organizations, and a financial literacy education program. We also reviewed one FDIC CRA Listening Session held in the Anaheim-Santa Ana-Irvine MD.

Financial literacy education and the ability to obtain and build credit were top commentor concerns. A need for multilingual services was also highlighted by multiple commentors. There is a need to provide small business loans, especially to sole proprietors of service industry businesses and those working in “side hustle” contractor positions. Funding in the form of loans and grants for affordable housing is also needed as costs for land and construction rise.

The information in the following table provides NOB AA demographic information for 2022.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper% of #	NA* % of #
Geographies (Census Tracts)	3,578	5.8	28.2	30.7	32.8	2.5
Population by Geography	15,382,652	5.2	28.8	31.9	32.9	1.1
Housing Units by Geography	5,382,410	4.9	26.3	31.0	36.6	1.2
Owner-Occupied Units by Geography	2,514,474	1.6	18.4	32.8	46.9	0.4
Occupied Rental Units by Geography	2,498,121	8.3	34.6	29.4	25.9	1.9
Vacant Units by Geography	369,815	5.1	24.7	29.1	38.7	2.4
Businesses by Geography	1,969,196	3.5	19.3	28.2	46.6	2.4
Farms by Geography	19,781	2.7	18.9	30.6	46.5	1.3
Family Distribution by Income Level	3,443,333	23.7	16.7	18.2	41.4	0.0
Household Distribution by Income Level	5,012,595	25.5	15.4	16.9	42.2	0.0
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA	\$76,686	Median Housing Value		\$648,247		
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA	\$80,317	Median Gross Rent		\$1,645		
Median Family Income MSA - 11244 Anaheim-Santa Ana-Irvine, CA	\$106,451	Families Below Poverty Level		9.9%		
<i>Source: 2020 U.S. Census and 2022 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 California

The CRA evaluation determines the bank’s record of meeting community credit needs. The OCC used a combination of bank and examiner generated loan and demographic reports to assess performance. The evaluation period for both the lending and CD tests is January 1, 2020 through December 31, 2022.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

Overall, the bank exhibits excellent geographic distribution of home mortgage and loans to small businesses in the state.

Home Mortgage Loans

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

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

For 2020-2021, the bank originated 1.7 percent of home mortgage loans in low-income CTs, representing reasonable distribution. The demographic percentage of owner-occupied housing units is 2.4 percent and aggregate lending is 2.6 percent in these CTs. In moderate-income CTs, the bank originated 19.0 percent of home mortgage loans, which exceeded both the 17.2 percent of owner-occupied housing units and the 16.4 percent of aggregate lending in these CTs. This represents excellent distribution. For 2021, the bank did not originate any home mortgage loans in low-income CTs, representing very poor distribution. The demographic percentage of owner-occupied housing units is 2.7 percent and aggregate lending is 2.6 percent in these CTs. In moderate-income CTs, the bank originated 10.0 percent of home mortgage loans, which less than both the 18.3 percent of owner-occupied housing units and the 16.7 percent of aggregate lending in these CTs. This represents reasonable distribution.

For 2022, the bank originated 2.0 percent of home mortgage loans in low-income CTs, representing excellent distribution. The demographic percentage of owner-occupied housing units is 1.6 percent and aggregate lending is 2.1 percent in these CTs. In moderate-income CTs, the bank originated 10.2 percent of home mortgage loans, which was lower than both the 18.4 percent of owner-occupied housing units and the 18.8 percent of aggregate lending in these CTs. This represents reasonable distribution.

Small Loans to Businesses

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

Overall, the bank's geographic distribution of small loans to businesses in LMI CTs in its AA reflects excellent distribution.

For 2020-2021, the bank originated 2.9 percent of small loans to businesses in low-income CTs, representing reasonable distribution. The demographic percentage of businesses is 4.8 percent and aggregate lending is 4.4 percent in these CTs. In moderate-income CTs, the bank originated 33.1 percent of small loans to businesses, which exceeded both the 19.2 percent of businesses and the 19.8 percent of

aggregate lending in these CTs. This represents excellent distribution. For 2021, the bank originated 8.0 percent of small loans to businesses in low-income CTs, representing excellent distribution. The demographic percentage of businesses is 5.0 percent and aggregate lending is 4.8 percent in these CTs. In moderate-income CTs, the bank originated 40.0 percent of small loans to businesses, which exceeded both the 20.0 percent of businesses and the 20.4 percent of aggregate lending in these CTs. This represents excellent distribution.

For 2022, the bank originated 7.8 percent of small loans to businesses in low-income CTs, representing excellent distribution. The demographic percentage of businesses is 3.5 percent in these CTs. In moderate-income CTs, the bank originated 25.5 percent of small loans to businesses, which exceeded the 19.3 percent of businesses in these CTs. This represents excellent distribution. Please note that there is no 2022 peer aggregate percentage available for comparison. The peer aggregate data will not be released until later in 2023. As the bank's CRA examination could not be postponed or rescheduled due to schedule conflicts, the bank's 2022 loan data is being reviewed without benefit of the peer aggregate data.

Lending Gap Analysis

The OCC 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. The OCC did not identify any unexplained conspicuous gaps in the bank's AA.

Distribution of Loans by Income Level of the Borrower

Overall, the bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

Overall, the distribution of home mortgage loans to LMI families reflects very poor distribution in its AA.

For 2020-2021, the bank did not originate any loans in low-income CTs, representing very poor distribution. Demographics show that 24.5 percent of families and 2.6 percent of aggregate lending is in these CTs. The bank did not originate any loans in moderate-income CTs, reflecting very poor distribution. Demographics show 16.3 percent of families and 6.7 percent of aggregate lending is in these CTs. For 2021, the bank did not originate any loans in low-income CTs, representing very poor distribution. Demographics show that 24.4 percent of families and 3.2 percent of aggregate lending is in these CTs. The bank did not originate any loans in moderate-income CTs, reflecting very poor distribution. Demographics show 16.4 percent of families and 8.3 percent of aggregate lending is in these CTs.

For 2022, the bank did not originate any loans in low-income CTs, representing very poor distribution. Demographics show that 23.7 percent of families and 4.4 percent of aggregate lending is in these CTs. The bank did not originate any loans in moderate-income CTs, reflecting very poor distribution. Demographics show 16.7 percent of families and 8.0 percent of aggregate lending is in these CTs.

Due to the high median housing prices in the AA, it is very hard for low- and moderate-income borrowers to afford home mortgages. The aggregate data reflects low percentages originated in LMI CTs.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$45,550 per year (or less than 50 percent of the 2022 FFIEC adjusted median family income in Los Angeles County) could afford a \$212,128 mortgage with a payment of \$1,139 per month. A moderate-income borrower making \$72,880 per year (or less than 80 percent of the 2022 FFIEC adjusted median family income in Los Angeles County) could afford a \$339,405 mortgage with a payment of \$1,822 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in Los Angeles County with an estimated payment of \$5,019 per month. The median listing price in the Los Angeles-Long Beach-Anaheim MSA was \$825,000 in 2020 and \$935,000 in 2022, reflecting a 13.3 percent change from 2020 to 2022 according to Realtor.com data.

Likewise using the same assumptions, a low-income borrower making \$59,550 per year (or less than 50 percent of the 2022 FFIEC adjusted median family income in Orange County) could afford a \$277,128 mortgage with a payment of \$1,489 per month. A moderate-income borrower making \$95,280 per year (or less than 80 percent of the 2022 FFIEC adjusted median family income in Orange County) could afford a \$443,723 mortgage with a payment of \$2,382 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in Orange County with an estimated payment of \$5,019 per month. The median listing price in the Los Angeles-Long Beach-Anaheim MSA was \$825,000 in 2020 and \$935,000 in 2022, reflecting a 13.3 percent change from 2020 to 2022 according to Realtor.com data.

Again, using the same assumptions, a low-income borrower making \$43,700 per year (or less than 50 percent of the 2022 FFIEC adjusted median family income in the Riverside-San Bernardino MSA) could afford a \$203,513 mortgage with a payment of \$1,093 per month. A moderate-income borrower making \$69,920 per year (or less than 80 percent of the 2022 FFIEC adjusted median family income in the Riverside-San Bernardino MSA) could afford a \$325,620 mortgage with a payment of \$1,748 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the Riverside-San Bernardino MSA with an estimated payment of \$3,031 per month. The median listing price in the Riverside-San Bernardino MSA was \$408,950 in 2020 and \$564,593 in 2022, reflecting a 38.1 percent change from 2020 to 2022 according to Realtor.com data.

Small Loans to Businesses

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

Overall, the distribution of small loans to businesses reflects excellent distribution to businesses of different sizes in the bank's AA.

For 2020-2021, the bank originated 9.4 percent of loans to businesses with revenues less than or equal to \$1.0 million. This is well below both the 91.0 percent of businesses and 45.1 percent of aggregate lending in the AA and reflects very poor distribution.

However, PPP loans originated in 2020 and 2021 did not require collection of Gross Annual Revenue (GAR) data. Consequently, the percentages of bank loans are significantly lower when compared with AA demographic and aggregate percentages and analysis would not be meaningful. As a result, we analyzed the distribution by using loan size as a proxy for revenue of the borrower.

Therefore, using loan size as a proxy for revenue of the borrower, the table below shows that approximately 92.3 percent of the number of loans originated and purchased by the bank were in amounts equal to or less than \$1 million. This represents excellent distribution in the bank's AA. In addition, a substantial majority, 76.3 percent, were loans in amounts equal to or less than \$100 thousand, reflecting responsiveness to the lending needs of small businesses.

Borrower Distribution of Loans to Businesses by Loan Size originated during 01/01/2020 – 06/24/2021 in the bank's AA				
Loan Size (000's)	# of Loans	% of Number	\$ Volume of Loans	% of Dollar Volume
\$0 - \$100,000	316	76.3	10,308	7.9
\$100,001 - \$250,000	40	9.7	6,121	4.7
\$250,001 - \$500,000	15	3.6	5,652	4.3
\$500,001 - \$1,000,000	11	2.7	8,902	6.8
Total	382	92.3	30,983	23.7
Over \$1,000,000	32	7.7	99,709	76.3

For 2021, the bank originated 72.0 percent of loans to businesses with revenues less than or equal to \$1.0 million. This is lower than the 90.4 percent of businesses, but exceeds the 45.4 percent of aggregate lending in the AA and reflects excellent distribution.

For 2022, the bank originated 64.7 percent of loans to businesses with revenues less than or equal to \$1.0 million. This is lower than the 90.4 percent of businesses and reflects reasonable distribution. Please note that there is no 2022 peer aggregate percentage available for comparison. The peer aggregate data will not be released until later in 2023. As the bank's CRA examination could not be postponed or rescheduled due to schedule conflicts, the bank's 2022 loan data is being reviewed without benefit of the peer aggregate data.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of California is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

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

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
NOB AA	16	80	\$30,919	99.8
Statewide or Regional Area	4	20	\$9,077	0.2
Total	20	100	\$39,996	100

The level of CD loans represents a satisfactory level of responsiveness to the CD needs in the AA. During the evaluation period, the bank made 16 qualified CD loans totaling \$30.9 million inside the AA. The majority of the loans, 70 percent, provided economic development for LMI individuals, which supported job creation and retention, and business expansion for small businesses. Another 24 percent provided affordable housing for LMI individuals and families to rehabilitate/remodel multi-family units located in LMI CTs. The remaining loans, six percent, provided community services through the purchase of an assisted living facility that caters to residents who receive Supplemental Security Income.

With the bank's responsiveness to needs within the AA, we also considered statewide or regional activities that had a purpose, mandate, or function for community development. The bank made an additional four qualified CD loans totaling \$9.1 million outside the AA. These loans provided economic development for LMI individuals and supported job creation and retention.

In addition, 85 percent of the bank's loan originations since June 7, 2022, also qualify as loans that either met the Emergency Capital Investment Program (ECIP) lending criteria or ECIP deep impact lending criteria. This includes three loans totaling \$6.9 million inside the AA. Two of these loans are part of the aforementioned loans that provided economic development for LMI individuals.

Number and Amount of Qualified Investments

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

Qualified Investments and Donations										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
NOB AA	1	\$248	11	\$39	12	50.0	\$287	8.8	0	\$0
Outside AA***	7	\$1,738	5	\$1,243	12	50.0	\$2,981	91.2	0	\$0
Total	8	\$1,986	16	\$1,282	24	100.0	\$3,268	100.0	0	\$0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

***Outside AA includes MDI investments.

The bank demonstrated a satisfactory level of responsiveness to the CD needs in the AA. During the current period, the bank provided 11 qualified investments/donations totaling \$39 thousand inside the AA. The qualified investments included donations to organizations that provide financial literacy, foods, healthcare, and other services to low-income individuals and families. There were no donations outside the AA.

This bank demonstrated a satisfactory level of responsiveness by investing in Minority Depository Institutions (MDIs) inside the AA and an excellent level of responsiveness for investing in MDIs outside the AA. During the current period, the bank invested in five MDIs totaling \$1.2 million, all located outside the AA. During the prior period, the bank invested in eight MDIs totaling \$2.0 million, of which \$248 thousand was inside the AA and \$1.7 million was outside the AA.

Extent to Which the Bank Provides Community Development Services

The bank demonstrated an adequate level of responsiveness to the CD needs in the AA. During the evaluation period, bank employees contributed 309.5 hours of qualified CD service hours. The number of service hours decreased slightly from the prior evaluation period due to shutdowns related to the COVID-19 pandemic, which made it difficult to provide more traditional CD services. Bank employees helped distribute food to LMI individuals in response to the economic distress from the COVID-19 pandemic. NOB partnered with various organizations such as Community Action Partnership of San Bernardino County, The Dream Center Los Angeles, Second Harvest Food Bank of Orange County, and the Union Rescue Mission, which provide mostly foods, healthcare, and other services to LMI individuals and families. Bank employees also distributed food at two schools where a majority of the students are low-income. In addition, bank management participated in LA REACH (Roundtable for Economic Access and Change), through Project REACH, to provide MDIs resources to evolve and thrive in the quickly changing financial service industry.

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:	01/01/2020 to 12/31/2022	
Bank Products Reviewed:	Small business and home mortgage loans Community development loans, qualified investments and donations, and services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
California		
New Omni AA	Full-scope	AA includes Los Angeles, Orange, and San Bernardino Counties.

Appendix B: Summary of MMSA and State Ratings

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

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2020-2021		
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
NOB 20-21 AA	58	74,378	100.0	454,866	2.4	1.7	2.6	17.2	19.0	16.4	26.6	24.1	25.3	53.7	55.2	55.6	0.1	0.0	0.1

Source: 2015 ACS; 01/01/2020 - 06/24/2021 Bank Data; 2021 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2021		
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
NOB 21 AA	30	20,604	100.0	784,825	2.7	0.0	2.6	18.3	10.0	16.7	29.2	36.7	28.7	49.7	43.3	51.6	0.1	10.0	0.4

Source: 2015 ACS; 06/25/2021 - 12/31/2021 Bank Data; 2021 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2022		
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
NOB AA	49	58,996	100.0	316,594	1.6	2.0	2.1	18.4	10.2	18.8	32.8	22.4	32.3	46.9	65.3	46.1	0.4	0.0	0.7

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data; 2022 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2020-2021		
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	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NOB 20-21 AA	58	74,378	100.00	454,866	24.5	0.0	2.6	16.3	0.0	6.7	16.7	0.0	15.2	42.4	81.3	57.6	0.0	20.7	18.0

Source: 2015 ACS; 01/01/2020 - 06/24/2021 Bank Data; 2021 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
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	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NOB 21 AA	30	20,604	100.0	784,825	24.4	0.0	3.2	16.4	0.0	8.3	17.3	3.3	17.3	41.9	90.0	53.1	0.0	6.7	18.1

Source: 2015 ACS; 06/25/2021 - 12/31/2021 Bank Data; 2021 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2022		
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	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
NOB AA	49	58,996	100.0	316,594	23.7	0.0	4.4	16.7	0.0	8.0	18.2	0.0	16.2	41.4	83.7	52.6	0.0	16.3	18.8

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data; 2022 HMDA Aggregate Data; Due to rounding, totals may not equal 100.0.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
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		
NOB 20-21 AA	414	130,692	100.0	445,991	4.8	2.9	4.4	19.2	33.1	19.8	21.2	29.0	22.2	52.6	34.3	51.6	2.3	0.7	2.1		

Source: 2021 D&B Data; 01/01/2020 - 06/24/2021 Bank Data; 2021 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																			2021		
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		
NOB 21 AA	25	46,874	100.0	664,345	5.0	8.0	4.8	20.0	40.0	20.4	25.5	40.0	26.2	47.8	12.0	46.9	1.7	0.0	1.8		

Source: 2021 D&B Data; 06/25/2021 - 12/31/2021 Bank Data; 2021 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																			2022		
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		
NOB AA	51	93,692	100.0	--	3.5	7.8	--	19.3	25.5	--	28.2	27.5	--	46.6	37.3	--	2.4	2.0	--		

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available; Due to rounding, totals may not equal 100.0.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020-2021	
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	
NOB 20-21 AA	414	130,692	100.0	445,991	91.0	9.4	45.1	3.6	3.1	5.5	87.4	

Source: 2021 D&B Data; 01/01/2020 - 06/24/2021 Bank Data; 2021 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											2021	
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	
NOB 21 AA	25	46,874	100.0	664,345	90.4	72.0	45.4	3.8	28.0	5.8	0.0	

Source: 2021 D&B Data; 01/01/2020 - 06/24/2021 Bank Data; 2021 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											2022	
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	
NOB AA	51	93,692	100.0	--	91.5	64.7	--	3.2	15.7	5.3	19.6	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available; Due to rounding, totals may not equal 100.0.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.