



## **PUBLIC DISCLOSURE**

February 4, 2019

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

Mission National Bank  
Charter Number 17176

3060 16<sup>th</sup> St  
San Francisco, CA 94103

Office of the Comptroller of the Currency

One Front Street, Suite 1000  
San Francisco, CA 94111

**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: Satisfactory**

### **The Lending Test is rated: Satisfactory**

- The average loan-to-deposit (LTD) ratio is more than reasonable at 96.6 percent for the 20 quarters ending December 31, 2018.
- A substantial majority of loans benefited businesses operating inside the bank's assessment area (AA).
- The bank's evaluation period lending activity reflects reasonable penetration among businesses of different sizes in the bank's AA.
- The geographic distribution of business loans reflects reasonable dispersion overall.
- There have been no written complaints regarding the bank's performance in meeting community credit needs.

## Definitions and Common Abbreviations

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

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

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

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

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

Mission National Bank (MNB) is a wholly owned subsidiary of MNB Holdings Corporation, a one-bank holding company, located in San Francisco, California. The bank, established in 1982, provides general banking services through its headquarters office and a branch in Berkeley, California. MNB is also a minority owned deposit institution. As of December 31, 2018, MNB had total assets of \$273 million, which included \$201 million in loans, representing total loans to total assets of 74 percent.

MNB's corporate structure has not changed since our last CRA examination. The bank focuses its lending activity on commercial real estate and business loans, although consumer and other products are also available. MNB is a niche bank with a primary focus on underserved commercial markets, including gas stations and convenience stores, hotels and motels, and residential care homes. The San Francisco-Oakland economy has been one of the fastest growing economies since the Great Recession, and competition in the bank's local market is highly competitive.

The bank's CRA performance was previously evaluated on May 14, 2014, and found to be satisfactory. There were no other legal, financial, or other barriers present during the evaluation period that would impede the bank's ability to meet the credit needs of the AA.

We also noted that during the evaluation period, MNB was certified as a Community Development Financial Institution (CDFI) based upon some of their lending activity. In 2018, MNB was awarded \$233,244 through the Bank Enterprise Award (BEA) Program, through which the CDFI fund seeks to increase the dollar amount of investments and services in the most economically distressed communities in the nation. FDIC-insured depository institutions that demonstrate increased investments in CDFIs or in their own lending, investing, or service-related activities in the most economically distressed communities can apply for a BEA Program Award. Awards must be reinvested in additional BEA Program qualified activities. While this level of activity did not materially impact the bank's overall CRA rating, it does help demonstrate MNB's commitment to serving commercial credit needs in the San Francisco-Oakland MSA.

# Scope of the Evaluation

## Evaluation Period/Products Evaluated

We evaluated MNB using Small Bank CRA Examination Procedures due to its asset size. These procedures are limited to a lending test. We assessed the bank's performance based on a sample of loans originated from January 1, 2016 to December 31, 2018.

We focused our evaluation on the bank's primary product line, which is commercial loans (Commercial real estate and construction, along with other types of commercial loans, were grouped together under the title "commercial loans" to evaluate the bank's performance). Our loan sample population was 50 commercial loans originated as new loans during the scope of our review. We did not assess residential, consumer, or agricultural credit products as these are not primary products of the bank.

<b>MISSION NATIONAL BANK</b>		
<b>Loan Portfolio Composition as of 12/31/2018</b>		
<b>Loan Type</b>	<b>\$ Volume (000)</b>	<b>% of Portfolio</b>
Commercial Loans	134,688	67.07
1-4 Family Residential Real Estate Loans	65,701	32.72
Consumer Loans	428	0.21
<b>Total Loans</b>	<b>200,818</b>	<b>100.0</b>

Source: Call Report

## Data Integrity

Based on its asset size, MNB is not required to report small business loan data under the Community Reinvestment Act, and so we did not conduct any data integrity reviews for purposes of this evaluation. We derived all of the bank information used in our analysis from source documents (e.g., loan files).

## Selection of Areas for Full-Scope Review

We performed a full-scope review of the San Francisco-Oakland MSA. Management and the board have designated 558 census tracts located in two counties, in two separate metropolitan divisions (MDs), as their Assessment Areas (AA). MNB designated San Francisco County as the first AA, which is located in the San Francisco-Redwood City-South San Francisco MD. MNB's second AA includes all of Alameda County, which is located in the Oakland-Hayward-Fremont MD. We combined both the San Francisco AA and the Alameda AA in our review of the San Francisco-Oakland MSA.

## **Ratings**

The bank's overall rating is based primarily on areas that received full-scope reviews. In this case, the bank's two AAs were combined and analyzed at the MSA level, and were subject to a full-scope review.

## **Discriminatory or Other Illegal Credit Practices Review**

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

The OCC 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.

# Conclusions with Respect to Performance Tests

## LENDING TEST

MNB’s performance under the lending test is rated “Satisfactory.”

### Loan-to-Deposit Ratio

MNB’s loan-to-deposit (LTD) ratio is more than reasonable given the bank’s size, financial condition, and the credit needs of the community. MNB’s average LTD ratio is 96.6 percent. The bank’s high LTD ratio was 116.0 percent, and the low was 80.7 percent. We looked at four similar institutions, both in size and location, and found an average quarterly LTD ratio of 85.6 percent. The assets of the peer banks were in the range of \$132 million to \$348 million. The institutions are located in a similar market and have a similar number of branches. The average LTD ratios were computed averaging the last 20 quarters (March 2014 to December 2018).

### Lending in Assessment Area

A substantial majority of loans are inside the bank’s AA. By number, 86.0 percent of the loans in our samples benefited businesses within the bank’s AA. By dollar, 82.5 percent of the loans in our sample benefited businesses within the bank’s AA.

<b>Lending in SF &amp; Oakland MSA</b>										
	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$ (000s)	%	\$ (000s)	%	
Commercial Loans										
Totals	43	86.00%	7	14.00%	50	\$17,989	82.49%	\$3,817	17.51%	\$21,806

Source: MNB Loan Sample

### Lending to Businesses of Different Sizes

The bank’s distribution of loans to businesses of different sizes reflects reasonable penetration given economic and competitive factors. Refer to Table R in Appendix C for facts and data to support conclusions.

The distribution of loans to businesses of different sizes is reasonable in 2016. By number, the percentage of loans benefitting small businesses<sup>1</sup> (60.0 percent) is within a reasonable range of the demographic comparator ratios, i.e. the percentage of businesses with gross annual revenues of \$1 million or less (84.5 percent), as well as the peer aggregate lending ratio (39.1 percent).

<sup>1</sup> Small businesses in this context are defined as businesses with gross annual revenues of \$1 million or less.

The overall distribution of loans to businesses of different sizes is reasonable in 2017 and 2018. By number, the percentage of loans benefitting small businesses (73.9 percent) is within a reasonable range of the demographic comparator ratios, i.e. the percentage of businesses with gross annual revenues of \$1 million or less (84.8 percent), as well as the peer aggregate lending ratio (54.2 percent).

### **Geographic Distribution of Loans**

The geographic distribution of business loans reflects reasonable dispersion overall. Refer to Table Q in Appendix C for facts and data to support conclusions.

In 2016, the geographic distribution of loans in low and moderate income tracts is reasonable. The percentage of loans the bank originated in low-income tracts (25 percent) exceeds both the percentage of businesses in low-income tracts (19.6 percent) as well as the overall peer aggregate lending ratio (14.5 percent). The percentage of loans the bank originated in moderate-income tracts (15 percent) is slightly below both the percentage of businesses in moderate-income tracts, as well as the peer aggregate lending ratio (16.8 percent).

In 2017 and 2018, the geographic distribution of loans in low-income tracts is excellent, and the distribution across moderate-income tracts is reasonable. The percentage of loans the bank originated in low-income tracts (39.1 percent), exceeds both the percentage of businesses in low-income tracts (16.3 percent), and the overall peer aggregate lending ratio (14.1 percent). The percentage of loans the bank originated in moderate-income geographies (13.0 percent) is slightly below both the percentage of businesses (17.8 percent) and the peer aggregate lending ratio (18.4 percent).

### **Responses to Complaints**

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

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test: (01/01/2016 to 12/31/2018)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Mission National Bank San Francisco, CA 94103	Business Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
San Francisco-Oakland MSA	Full Scope	Counties: San Francisco and Alameda

## Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: San Francisco-Oakland MSA (2016)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	557	16.9	21.7	32.0	28.7	0.7
Population by Geography	2,315,506	15.7	21.4	34.3	28.6	0.0
Housing Units by Geography	950,098	16.6	20.3	33.5	29.6	0.0
Owner-Occupied Units by Geography	419,305	6.7	16.0	37.8	39.5	0.0
Occupied Rental Units by Geography	448,677	24.1	24.6	30.1	21.2	0.0
Vacant Units by Geography	82,116	25.4	19.2	30.4	24.9	0.0
Businesses by Geography	189,119	19.6	16.1	27.5	36.8	0.1
Farms by Geography	1,913	10.7	16.8	31.1	41.3	0.1
Family Distribution by Income Level	490,519	26.2	16.2	18.2	39.3	0.0
Household Distribution by Income Level	867,982	28.3	15.2	16.3	40.1	0.0
Median Family Income MSA - 36084 Oakland-Hayward-Berkeley, CA MD		\$88,024	Median Housing Value			\$643,173
Median Family Income MSA - 41884 San Francisco-Redwood City-South San Francisco, CA		\$93,987	Median Gross Rent			\$1,263
					Families Below Poverty Level	7.7%
<p>Source: 2015 ACS Census and 2017 D&amp;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.</p>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: San Francisco-Oakland MSA (2018)</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	558	14.7	22.0	29.2	31.9	2.2
Population by Geography	2,425,746	13.4	22.9	31.9	31.1	0.8
Housing Units by Geography	973,534	13.9	21.4	30.9	32.6	1.1
Owner-Occupied Units by Geography	423,342	5.6	17.9	34.1	42.0	0.3
Occupied Rental Units by Geography	488,852	20.3	24.7	28.6	24.8	1.6
Vacant Units by Geography	61,340	20.8	19.6	27.7	30.0	1.9
Businesses by Geography	200,361	16.3	17.9	26.1	38.3	1.4
Farms by Geography	2,032	9.0	16.6	31.9	42.2	0.3
Family Distribution by Income Level	530,792	26.3	15.8	17.7	40.2	0.0
Household Distribution by Income Level	912,194	28.4	14.4	15.6	41.5	0.0
Median Family Income MSA - 36084 Oakland-Hayward-Berkeley, CA MD		\$93,822	Median Housing Value			\$641,210
Median Family Income MSA - 41884 San Francisco-Redwood City-South San Francisco, CA		\$103,742	Median Gross Rent			\$1,473
					Families Below Poverty Level	8.3%
<i>Source: 2015 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to a Moody’s Analytics report dated November 2018, the San Francisco economy benefits from economic drivers in the technology, financial, and medical sectors. Strong job growth between 2012 and 2016 has slowed, but is still in line with the national average. The business cycle has been in an expansion phase, and is now in late expansion. The unemployment rate steadily declined between 2012 and 2018. Market strengths include a highly educated and skilled workforce, robust tech sector, and strong office market growth. Weaknesses include the high cost of doing business in the area, the strict business regulatory environment, and limited land for new construction. Top employers include the University of California (San Francisco), Genentech Inc., Wells Fargo, Oracle Corp. and Salesforce.com Inc. Key industries include professional and business services, leisure and hospitality services, education and health services, and government. Average annual earnings are higher in San Francisco when compared to California and the U.S. in general, but housing expense is also high.

According to a Moody’s Analytics report dated November 2018, the Oakland economy benefits from economic drivers in the federal government, high tech, and medical sectors. Job growth has slowed recently, but the economy is on firm ground. The business cycle has been in an expansion phase, and is now in late expansion. The unemployment rate steadily declined between 2012 and 2018. Market strengths include world-class universities and laboratories, proximity to San Francisco, ample infrastructure (transportation and distribution), and commercial space for tech firms leaving Silicon Valley. Weaknesses include higher housing

costs than in the Central Valley and Nevada metro areas, and a high-tech scene that is overshadowed by that of the Bay Area. Top employers include the University of California (Berkeley), Safeway Inc., Kaiser Permanente, and Tesla. Key industries include education and health services, professional and business services, government, retail trade, leisure and hospitality services. Average annual earnings are somewhat higher or on par with California averages, and typically higher than the U.S. average.

Unemployment rates have declined over the evaluation period. According to public data published by the Bureau of Labor Statistics, the unemployment rate in the San Francisco-Oakland MSA declined from 4.2 percent in 2015, to 3.8 percent in 2016, and to 3.3 percent in 2017. The 2018 annual average was not available, but monthly data indicate a continuation of the declining trend. In comparison, the unemployment rate in California was higher, but also declined steadily, from a rate of 6.2 percent in 2015 to 4.2 percent in 2018. The unemployment rate for the U.S. declined from 5.3 percent in 2015 to 3.9 percent in 2018.

According to the June 30, 2018 FDIC Deposit Market Share Report, 69 commercial banks have at least one branch in the San Francisco-Oakland MSA. MNB has minimal market share at less than 0.1 percent of AA deposits. Bank of America and Wells Fargo have the highest market share, at 32.2 percent and 20.8 percent of AA deposits, respectively. In addition, based upon 2017 peer small business data, there are 142 lenders in the San Francisco-Oakland MSA that are required to report small business lending data (and made at least one loan in the MSA in 2017). Top lenders by number of loans include Chase Bank (21.1 percent market share), American Express (19.6 percent), Bank of America (13.6 percent), and Wells Fargo (11.6 percent), demonstrating the significant lending competition in the MSA.

On January 12, 2017, there was a CRA Listening Session in San Francisco, which is an outreach activity conducted with representatives from various regulatory agencies, including the OCC and FDIC. The session is conducted with local community representatives and bankers to discuss community profiles and trends, opportunities for participation by local financial institutions, performance of local financial institutions, general comments regarding CRA, and comments by regulators. Most of the participants in the session felt that the constituents they serve have not benefited fully from the economic recovery. Some of the issues facing low- and moderate-income households include stagnant or decreasing wages, increasing housing costs, and the lack of affordable housing options. In relation to small business, many of the participants expressed concern with the lack of available commercial space and the rising costs of existing commercial space. In addition, many participants felt that the rising costs have made it difficult for the employees of small businesses to affordably live in the city, thus impacting employment at small businesses.

The listening session also addressed opportunities for local financial institutions. These opportunities included the following: partnering in state programs, providing financial literacy for both consumers and business owners, seeking out more opportunities related to grants, and funding micro-lending programs and smaller dollar loans. In general, attendees felt that local financial institutions could do more to assist community development efforts and to tailor their assistance to higher priority issues.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems

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 MA/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 originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data is 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 Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

**Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** – The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data is not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

**Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.

**Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households throughout those geographies.

**Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** – Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MA/assessment area.

**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		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
San Francisco-Oakland MSA	20	9,560	100.0	104,554	19.6	25.0	14.5	16.1	15.0	16.8	27.5	35.0	30.6	36.8	25.0	38.0	0.1	0	0
<b>Total</b>	<b>20</b>	<b>9,560</b>	<b>100.0</b>	<b>104,554</b>	<b>19.6</b>	<b>25.0</b>	<b>14.5</b>	<b>16.1</b>	<b>15.0</b>	<b>16.8</b>	<b>27.5</b>	<b>35.0</b>	<b>30.6</b>	<b>36.8</b>	<b>25.0</b>	<b>38.0</b>	<b>0.1</b>	<b>0</b>	<b>0</b>

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

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
San Francisco-Oakland MSA	23	8,429	100.0	79,427	16.3	39.1	14.1	17.8	13.0	18.4	26.2	34.8	28.2	38.4	13.0	38.2	1.4	0.0	1.1
<b>Total</b>	<b>23</b>	<b>8,429</b>	<b>100.0</b>	<b>79,427</b>	<b>16.3</b>	<b>39.1</b>	<b>14.1</b>	<b>17.8</b>	<b>13.0</b>	<b>18.4</b>	<b>26.2</b>	<b>34.8</b>	<b>28.2</b>	<b>38.4</b>	<b>13.0</b>	<b>38.2</b>	<b>1.4</b>	<b>0.0</b>	<b>1.1</b>

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
San Francisco-Oakland MSA	20	9,560	100.0	104,554	84.5	60.0	39.1	6.8	40.0	8.7	0
<b>Total</b>	<b>20</b>	<b>9,560</b>	<b>100.0</b>	<b>104,554</b>	<b>84.5</b>	<b>60.0</b>	<b>39.1</b>	<b>6.8</b>	<b>40.0</b>	<b>8.7</b>	<b>0</b>

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017-18**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
San Francisco-Oakland MSA	23	8,429	100.0	79,427	84.8	73.9	54.2	6.7	26.1	8.5	0
<b>Total</b>	<b>23</b>	<b>8,429</b>	<b>100.0</b>	<b>79,427</b>	<b>84.8</b>	<b>73.9</b>	<b>54.2</b>	<b>6.7</b>	<b>26.1</b>	<b>8.5</b>	<b>0</b>

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