



PUBLIC DISCLOSURE

February 11, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Northern California National Bank
Charter Number 24626

1717 Mangrove Avenue, Suite 100,
Chico, CA 95926

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, nor should it 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 is Satisfactory

The major factors that supports this rating include:

- NCNBs loan-to-deposit ratio is less than reasonable given the bank's size, financial condition, and the credit needs of the community. However, management is actively marketing for high quality loans, and the loan portfolio continues to grow significantly.
- A substantial majority of the loans are in the institution's assessment area.
- The borrower distribution of loans reflects reasonable penetration among businesses of different sizes.
- The geographic distribution of loans reflects reasonable penetration in geographies of different income levels.

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 usually have between 2,500 and 8,000 persons, and 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 refinancing, 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 ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that

is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

Northern California National Bank (NCNB) is a community bank chartered on March 28, 2006, and is headquartered in Chico, California. As of December 31, 2018, NCNB had total assets of \$245 million, with \$102 million in loans. The bank's net loans represent 42 percent of total assets. NCNB operates one full service branch at its headquarters in Chico, California, with no other branches. In November 2018, NCNB opened a loan production office in Sacramento, California. NCNB focused its lending activity on non-residential real estate and commercial loans per the bank's business strategy, although residential real estate and agricultural loans are also available.

There are no legal or financial circumstances impeding the bank's ability to help meet the credit needs of the community. The bank's CRA performance was previously evaluated on October 6, 2014, and was found satisfactory.

The following table reflects details about the bank's loan portfolio as of December 31, 2018.

Table 1

NORTHERN CALIFORNIA NATIONAL BANK LOAN PORTFOLIO COMPOSITION AS OF DECEMBER 31, 2018		
Loan Type	\$ Volume (000)	% of Portfolio
Commercial (including Non Residential RE)	72,827	70
Residential RE	22,706	22
Agricultural	5,863	5
Other	2,220	1
Total Loans	103,616	2

Source: Consolidated Report of Condition

SCOPE OF THE EVALUATION

OCC examiners evaluated NCNB's performance based on loans originated from January 1, 2016 through December 31, 2018. Examiners focused their evaluation on the bank's primary product lines: non-residential real estate and commercial. For the purposes of this examination, examiners combined both under one category (business loans). Home mortgage and agricultural loan products were not selected to be reviewed since the bank is not a major mortgage or agricultural lender in this market.

Examiners randomly selected 25 loans originated in 2016, and 25 loans originated in years 2017 and 2018. Due to a change in required data sources, examiners performed two separate analyses for the following sections: demographics of the assessment area, lending to borrowers of different income levels and businesses of different sizes, and the geographic distribution of loans. The reason for the two analyses is because loans originated up to year-end 2016 used data from the 2010 U.S. Census, and loans originated after 2016 used data from the 2015 American Consumer Survey (ACS).

Data Integrity

OCC examiners did not perform a data integrity review as part of this review. Examiners selected a random sample of commercial loans, which are not subject to any public reporting requirements. Instead, the bank provided examiners with relevant revenue, location, and other data from the loan files in the sample to perform this analysis. Home mortgage loan product is not a primary loan product at this bank. Examiners did not analyze residential loans, which are HMDA reportable and would otherwise be subject to data integrity review, as part of a CRA review.

Selection of Areas for Full-Scope Review

NCNB is located in Butte County, which is part of the Chico Metropolitan Statistical Area (MSA). The bank's assessment area (AA) includes all census tracts located in Butte County. The AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income geography. Please refer to Appendix B for further details on the AA.

Table 2 and 3 below highlight the demographic composition of NCNBs AA.

Table 2

CHICO AA COMPOSITION						
INCOME CHARACTERISTICS OF CENSUS TRACTS, BUSINESSES AND FAMILIES						
Income of Census Tract	# and % of Census Tracts		# and % of Businesses		# and % of Families	
Low Income	1	1.96%	51	0.35%	550	1.05%
Moderate Income	14	27.45%	4,027	28.19%	10,719	20.47%
Middle Income	25	49.02%	6,100	42.70%	26,914	51.39%
Upper Income	11	21.57%	4,108	28.76%	14,194	27.10%
N/A	0	0%	0	0%	0	0%
Total:	51	100.00%	14,286	100.00%	52,377	100.00%

Data Source: D&B as of June 2016; 2010 US Census

Table 3

CHICO AA COMPOSITION						
INCOME CHARACTERISTICS OF CENSUS TRACTS, BUSINESSES AND FAMILIES						
Income of Census Tract	# and % of Census Tracts		# and % of Businesses		# and % of Families	
Low Income	2	3.92%	182	1.22%	974	1.91%
Moderate Income	14	27.45%	3,826	25.58%	11,805	23.16%
Middle Income	24	47.06%	7,000	46.81%	24,780	48.62%
Upper Income	11	21.57%	3,947	26.39%	13,404	26.30%
N/A	0	0%	0	0%	0	0%
Total:	51	100.00%	14,955	100.00%	50,963	100.00%

Data Source: D&B as of June 2018; 2015 ACS US Census

Ratings

The bank's overall rating is based on a full-scope review of performance in its single AA of Butte County.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

Conclusions with Respect to Performance Tests

Lending Test

The bank's performance under the Lending Test is rated "Satisfactory." Based on a full-scope review, the bank's performance in Butte County is reasonable.

Loan-to-Deposit Ratio

NCNB's loan-to-deposit (LTD) ratio is less than reasonable given the bank's size, financial condition, and the credit needs of the community. Average LTD ratios were computed from November 30, 2014 to December 31, 2018. NCNB's average quarterly LTD ratio is 43 percent. The following table shows the quarter by quarter LTD since the last CRA evaluation.

Table 4

LOAN-TO-DEPOSIT RATIOS																
4Q18	3Q18	2Q18	1Q18	4Q17	3Q17	2Q17	1Q17	4Q16	3Q16	2Q16	1Q16	4Q15	3Q15	2Q15	1Q15	4Q14
45.75	49.27	47.21	41.70	47.59	45.23	42.99	42.47	45.60	38.89	40.23	38.85	44.98	39.60	40.62	39.66	46.27

Data Source: Consolidated Report of Condition

The bank's average quarterly LTD of 43 percent is not a concern as the bank's loan portfolio has significantly increased since the previous CRA evaluation. From December 31, 2014 to December 31, 2018, loan portfolio grew by \$38.6 million, with an average year over year growth rate of 12.7 percent. In the same period, core deposits grew by \$99.4 million, with an average year over year growth rate of 19.6 percent. While the LTD increased by 300 bps from the previous CRA evaluation, it does not reflect the loan growth because core deposits grew more as the bank was able to gather deposits more easily than compete for loans. There are 26 large bank lenders in addition to a multitude of smaller lenders in the Butte County area, which lend to small businesses. The bank competes with national large bank lenders, such as Citibank, US Bank, Wells Fargo, Chase Bank, Capital One, and Bank of America who dominate in market share. OCC examiners found only one other institution similar in size and location to NCNB. This institution had an average quarterly LTD ratio of 72 percent. NCNB management explained that the bank's below peer bank ratio is due to the bank's conservative risk profile and strategic focus on maintaining very high credit standards.

While the bank's conservative lending practices and market competition hinder the bank's ability to extend credit in the community, the bank continues to actively market for high quality loans.

Lending in Assessment Area

NCNB's level of lending within the assessment area exceeds the standard for satisfactory performance. A substantial majority of NCNB's business loans were originated inside of its AA. Based on examiner's initial sample of 50 loans, 39 loans were granted in the AA. This shows that 78 percent of the number of loans, and 67 percent of dollar volume, are made in NCNB's AA as illustrated in the following table:

Table 5

NORTHERN CALIFORNIA NATIONAL BANK								
Loan Type	Number of Loans				Dollars of Loans			
	Inside		Outside		Inside		Outside	
	#	%	#	%	\$	%	\$	%
Business Loans	39	78	11	22	26,976,939	67	13,068,634	33
Total	39	78	11	22	26,976,939	67	13,068,634	33

Source: Sample of 50 business loans originated from January 1, 2016 to December 31, 2018.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

NCNB's distribution of loans to businesses of different sizes is reasonable and meets the standard for satisfactory CRA performance. The analysis is based on the randomly selected sample of 20 business loans originated in 2016 and 20 business loans originated in 2017 and 2018 within Butte County. The following tables show the distribution of business loans by the size of the business (Table 5 and Table 6). Note that businesses with annual gross revenues of \$1 million dollars or less were deemed to be small businesses.

Table 6

2016 CHICO AA				
INCOME DISTRIBUTION OF LOANS TO BUSINESSES				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	85.29%	4.51%	10.20%	100%
% of Bank Loans in AA by #	70.00%	25.00%	5.00%	100%
% of Bank Loans in AA by \$	26.27%	71.91%	1.82%	100%

Data Source: D&B as of June 2016; 2010 US Census

Based on the sample, the percentage of loans to small businesses, as defined as businesses with revenues of less than or equal to \$1 million, within the bank's AA was 70 percent by number and 26 percent by dollar, as compared to area demographics of 85 percent.

Table 7

2017 – 2018 CHICO AA				
INCOME DISTRIBUTION OF LOANS TO BUSINESSES				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	85.43%	4.47%	10.10%	100%
% of Bank Loans in AA by #	60.00%	30.00%	10.00%	100%
% of Bank Loans in AA by \$	36.13%	25.89%	37.98%	100%

Data Source: D&B as of June 2018; 2015 ACS US Census

Based on the sample, the percentage of loans to small businesses within the bank's AA was 60 percent by number and 36 percent by dollar, as compared to area demographics of 85 percent.

Although the bank's performance in both analyses is below area demographics, there is a good level of competition from large institutions. Based on CRA loan data, the top seven institutions

made 96 percent of loans by number to businesses with revenues of \$1 million or less in 2016 and 90 percent in 2017. By dollar amount, these same seven institutions made 87 percent to businesses with revenues of \$1 million or less in 2016 and 54 percent in 2017. The top seven institutions in 2016 consist of Citibank, US Bank, American Express, Wells Fargo Bank, Capital One Bank, Tri Counties Bank, and Bank of America. In 2017, the top seven institutions consist of Citibank, US Bank, American Express, Wells Fargo Bank, Chase Bank, Capital One Bank and Bank of America.

Geographic Distribution of Loans

Based on the sample, the bank has reasonable dispersion of loans throughout the AA. The bank did not penetrate all census tracts within its AA. However, examiners found no conspicuous gaps in the bank's distribution of loans.

Table 8

2016 CHICO AA GEOGRAPHIC DISTRIBUTION OF LOANS TO BUSINESSES								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	0.35	0.00	28.68	25.00	43.18	30.00	27.79	45.00

Data Source: D&B as of June 2016; 2010 US Census

As shown in the table above, the bank's distribution of business loans originated in low-income geographies, by the percentage of number of loans, was zero, near to area demographics of 2016. The bank's distribution of business loans originated in the moderate-income geographies, by percentage of number of loans, was 25 percent. The percentage of loans in this geography were slightly below the percentage of business in the AA.

Table 9

2017 – 2018 CHICO AA GEOGRAPHIC DISTRIBUTION OF LOANS TO BUSINESSES								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	1.26	0.00	26.17	20.00	47.11	30.00	25.47	50.00

Data Source: D&B as of June 2018; 2015 ACS US Census

As shown in the table above, the bank's distribution of business loans originated in low-income geographies, by the percentage of number of loans, was zero, near to area demographics of 2018. Area demographics for businesses in low census tracts increased in this analysis compared to the

2016 analysis because the 2015 American Community Survey (ACS) data describes that there are now two census tracts considered low income instead of one.

In 2018, the bank's distribution of business loans originated in the moderate-income geographies, by percentage of number of loans, was 20 percent. The percentage of loans in this geography was slightly below the percentage of business in the AA.

Responses to Complaints

No written complaints concerning NCNB's CRA performance have been received since the bank's previous CRA examination, dated October 6, 2014.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (Small business loans): 01/01/2016 to 12/31/2018	
Financial Institution		Products Reviewed
Northern California National Bank Chico, California		Business Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
California Butte County – Chico MSA	CRA exam	

Appendix B: Community Profiles for Full-Scope Areas

Butte County

NCNB AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income individuals or geographies. The AA consists of 51 census tracts in Butte County, which are determined by the 2010 U.S. Census. The City of Chico serves as the county seat of Butte County. Butte County is located 80 miles north of Sacramento, with an estimated total population of 222,564 according to 2015 ACS data. According to Moody's Analytics for 2018, Chico has continued to experience economic growth, with an unemployment rate of 5.0 percent, its lowest over the past six years. Moody's Analytics noted the unemployment rate is projected to increase over the next few years.

The Camp Fire in 2018 burned one-tenth of Butte County's surface, and one town (Paradise) was destroyed. The fire caused employment disruptions with the largest disruption in the health sector, as the Feather River Hospital does not have a set date to reopen. Moody's Analytics noted that it will be several years before the economy makes a full recovery but will boost employment in construction and consumer services. The major employers in the area are Enloe Medical Center and California State University – Chico. The following table provides additional information about the demographics of Butte County.

Demographic Information for Full Scope Area: Butte County (2018)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	51	3.92%	27.45%	47.06%	21.57%	0.00%
Population by Geography	222,564	3.93%	26.18%	46.63%	23.26%	0.00%
Owner-Occupied Housing by Geography	97,133	0.89%	20.25%	51.64%	27.22%	0.00%
Business by Geography	14,003	1.26%	26.17%	47.11%	25.47%	0.00%
Farms by Geography	952	0.63%	17.02%	42.33%	40.02%	0.00%
Family Distribution by Income Level	50,963	1.91%	23.16%	48.62%	26.30%	0.00%
Median Family Income		\$58,679	Median Housing Value			\$225,491
FFIEC Adjusted Median Family Income for 2018		\$60,500	Unemployment Rate (2010 US Census)			6.71%
Households Below Poverty Level		20.07%				

Source: 2015 ACS US Census and 2018 FFIEC updated MFI

Competition in the area is strong with nine banks operating within Butte County at June 30, 2018, according to the FDIC summary of deposits report. NCNB ranks 3rd in deposit market share with 12.26 percent. The five largest banks hold 87 percent of the deposit market share. Other area banks include Tri Counties Bank; Wells Fargo Bank, N.A.; Bank of America, N.A.; JPMorgan Chase Bank, N.A.; and Rabobank, N.A.

One community contact with a representative of the community identified credit needs and possible opportunities for banks. The needs include affordable housing, and technical assistance such as financial planning or developing budgets for small businesses.