



## **PUBLIC DISCLOSURE**

June 06, 2016

### **COMMUNITY REINVESTMENT ACT (CRA) PERFORMANCE EVALUATION**

BofI Federal Bank  
Charter Number 716456

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San Diego, CA 92122

Office of the Comptroller of the Currency

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 following table indicates the performance level of Bofl Federal Bank (Bofl or Bank) with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- Bofl’s lending activity in its assessment area (AA), the San Diego-Carlsbad California MSA, is adequate.
- The portion of Bofl’s loans made inside its AA is reasonable considering the Bank’s business focus as an internet bank.
- The geographic distribution of the Bank’s loans in its AA and supplemental areas outside the AA is adequate.
- The borrower distribution of the Bank’s loans in its AA and supplemental areas outside the AA is adequate.
- Bofl provided a high level of community development (CD) loans, which contributes positively to the Lending Test rating.
- The Bank provided an excellent level of qualified investments in its AA.
- The Bank’s branch and alternate delivery systems provide reasonable accessibility to low- and moderate-income (LMI) individuals. Bofl also provided a good level of CD services.

## 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 metropolitan area (MA)/AA.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. CT boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. CTs usually have between 2,500 and 8,000 persons, and their physical sizes vary widely depending upon population density. CTs 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of LMI individuals.

**Community Reinvestment Act:** 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 CT 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 do business or have banking offices in a Metropolitan Statistical Area (MSA) 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, and the disposition of the application (e.g., approved, denied, or withdrawn). Beginning in 2004, the reports also include additional data on 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/AA.

**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:** Any MSA 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 MSA 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 MSA 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 MA. 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 MA, the institution will receive a rating for the multi-state MA.

**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). 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

Bofl is a non-traditional savings bank headquartered in San Diego, California. Bofl is a wholly-owned subsidiary of Bofl Holding, Inc. The Bank operates one branch and one automated teller machine (ATM) in San Diego, California. The bank opened a second branch in Reno, Nevada on August 31, 2015. The Bank has no affiliates outside of the holding company, which is located at the same address as the Bank.

Bofl focuses on serving customers' banking needs primarily through the internet. The Bank distributes its deposit products through the branches, ATM, mobile access, and the internet. The Bank distributes its loan products through retail, correspondent, and wholesale channels. The Bank markets its products using the following brand names: Bank of Internet USA, Bofl Advisor, Apartment Bank, UFB Direct, Annuitants Federal Bank, Virtus Bank, NetBank, and Bank X.

Since the previous CRA examination, Bofl's total assets increased significantly from \$2.9 billion as of December 31, 2012, to \$7.7 billion as of March 31, 2016. The increase in the Bank's assets is primarily attributable to an increase in single-family residence (SFR) loans. As of March 31, 2016, the Bank reported total deposits of \$6.1 billion, total loans of \$6.2 billion, and tier one capital of \$633.8 million.

Bofl is primarily a residential mortgage lender, but does originate a significant number of multifamily (five or more unit) residential mortgages, which includes the financing of mixed-use, student housing, and mobile home parks. The ratio of net loans to total assets is 80 percent. The Bank's loan portfolio is primarily composed of 1-4 family residential loans and multifamily loans, which represent 66 percent and 21 percent of total loans, respectively. The remaining 13 percent of the loan portfolio is composed of commercial and industrial loans, commercial real estate loans, leases, consumer loans, and other loans.

There are no legal, financial or other factors that impede the Bank's ability to help meet the credit needs of its AA. The Bank received a "Satisfactory" rating in its previous CRA evaluation dated May 20, 2013.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation assesses the Bank's performance under the Lending, Investment, and Service Tests. In evaluating Bofl's lending performance, we reviewed the Bank's residential mortgage loans subject to filing under HMDA, small loans to businesses, and the Bank's CD loans. We also reviewed consumer loans the Bank requested to have evaluated. These unsecured loans are the Emerald Advance product, which is a consumer line of credit ranging from \$350 to \$1,000 the Bank began offering in 2015. The Bank did not originate any reportable small farm loans during the review period. Our evaluation of the Bank's performance under the Investment Test included a review of investments, grants, and



donations that meet the definition of CD investments. The Service Test evaluation is based on branch operations, alternate delivery systems, loan/deposit products and services, and CD services provided in Bofl's AA. The review period for HMDA and small business loans is January 1, 2012 through December 31, 2015. The review period for consumer loans is 2015. The review period for CD loans, investments, and services is May 20, 2013 through June 6, 2016.

## **Data Integrity**

Prior to this CRA evaluation, we performed a data integrity examination to ensure the accuracy of Bofl's publicly filed information on home mortgage loans and small loans to businesses. The data we reviewed was collected and reported by the Bank over the evaluation period. In addition, we reviewed the accuracy of consumer loan data which the Bank requested to have evaluated. We concluded that the home mortgage loan, business loan, and consumer loan data could be relied upon for this examination. Additionally, CD loans, investments, and services made or rendered during the evaluation period were reviewed to determine their eligibility for consideration. We included in this examination all activities found to meet the definition of CD.

## **Selection of Areas for Full-Scope Review**

We performed a full-scope review of Bofl's primary AA, the San Diego-Carlsbad, CA MSA. We also assessed the Bank's performance in supplemental AAs that represent a sample of the Bank's entire marketplace. We selected the areas having the highest number of loans and deposits throughout the United States. We did not include the Reno, NV MSA AA in our evaluation since the branch there was only open four months during our lending evaluation period.

## **Ratings**

Bofl is a non-traditional bank that gathers deposits and offers loans throughout the United States. Consequently, the ratings are based on the Bank's CRA performance in the San Diego-Carlsbad, CA MSA (San Diego AA), as well as performance in areas outside the AA where the Bank has originated or purchased a substantial portion of its loans and/or gathered a substantial portion of its deposits. We selected six states (California, Missouri, Nevada, Ohio, Oregon, and Texas) as a representative sample of the Bank's entire marketplace. Together these states include 30 percent of the Bank's deposits by number of accounts, almost 56 percent of the Bank's reported mortgage and small business loans by number, and almost 65 percent of reported lending volume by dollar during the evaluation period.

When evaluating the Bank's performance under the Lending Test, we placed greater weight on mortgage loans than small loans to businesses because of the identified community credit needs for home loans. The weights for mortgage loans were based on the volume in number in each home mortgage loan category. We gave the least weight to consumer loans because, while they represented the majority of reported loans by number, they represented only 5.3 percent of the reported dollar volume of loans during the evaluation period. Additionally, the Bank's performance in California is weighted more heavily than the other supplemental AAs

because it includes approximately 41 percent of the reported mortgage loans and approximately 37 percent of the reported small loans to businesses during the evaluation period.

## **Community Contacts**

Examiners contacted one community group and reviewed one community contact that was recently performed in the Bank's AA. One contact is a state-chartered agency dedicated to preserving and increasing affordable housing within the City of San Diego. The organization also provides rental assistance and homeless solution programs in San Diego. The contact stated that there is a lack of affordable housing in San Diego and a 15-year waitlist for Section 8 housing (rental subsidy vouchers). The other contact is a California housing non-profit organization that specializes in building and renting apartments for low and moderate-income households. This contact also confirmed the need for more affordable housing and homeless solutions, as well as the need for financial literacy programs.

## **Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c), or 12 CFR 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any AA by an affiliate whose loans have been considered as part of the bank or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

The Bank's performance under the Lending Test is rated "Low Satisfactory."

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the Bank's performance in its San Diego AA is adequate.

### **Lending Activity**

Refer to Table 1 Lending Volume and Table 1 Other Products in Appendix C for the facts and data used to evaluate the Bank's lending activity in the San Diego AA.

The Bank's lending activity in its AA is adequate. During the evaluation period, the Bank originated 1,321 HMDA loans in the San Diego AA totaling \$779 million. In addition, the bank originated 35 CD loans, some of which are included as multifamily loans in the HMDA data noted above. HMDA loans in the San Diego AA represent almost nine percent of the total HMDA loans the Bank originated throughout the United States during the review period. Of all HMDA loans reported in the AA during the review period, home refinance loans represented 50 percent, home purchase loans represented 34 percent, multifamily loans represented 10 percent, and home improvement loans represented six percent.

Bofl has one branch and all of its deposits in the AA. As of June 30, 2015, the bank ranked fifth in the AA with almost 6.1 percent deposit market share. The top four institutions hold almost 66 percent deposit market share. The 2014 Peer Mortgage Data indicates the Bank has a negligible market share for home purchase, home improvement, and home refinance loans with 0.46 percent, 0.98 percent, and 0.23 percent respectively. However, the Bank competes with numerous large institutions who dominate the market for home mortgage loans. On the other hand, Bofl ranks seventh out of 57 lenders and has an excellent market share of 3.29 percent for multifamily loans in the San Diego AA. The top two lenders have a combined market share of almost 56 percent.

Small loans to businesses comprised 34.4 percent of reported lending in the AA. Small loans to businesses in the San Diego AA represent 3.8 percent of the total small loans to businesses the Bank originated throughout the United States during the review period. The 2014 Peer Small Business Data indicates Bofl ranked eighteenth out of 134 lenders in the AA with a 0.34 percent market share. Competition among the lenders is strong as the top three lenders have a combined market share of over 54 percent.

Bofl requested that the consumer loans originated in 2015 be evaluated for CRA purposes. The Bank originated 2,275 consumer loans in the San Diego AA totaling \$2.2 million. This represents only 0.41 percent of the almost 561 thousand loans totaling over \$526 million originated throughout the United States.

## **Distribution of Loans by Income Level of the Geography**

Overall, the geographic distribution of the Bank's loans in the San Diego AA is adequate. The distribution of home mortgage loans is adequate, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of the Bank's home mortgage loans in the San Diego AA is adequate. The distribution of home purchase loans is very poor, the distribution of home improvement loans is adequate, the distribution of home refinance loans is adequate, and the distribution of multifamily loans is excellent.

The geographic distribution of home purchase loans in LMI geographies in the San Diego AA is very poor. The percentage of the Bank's loans originated in low-income geographies is significantly below both the aggregate and the demographic comparators. The percentage of the Bank's loans in moderate-income CTs is significantly below both the aggregate and the demographic comparators.

The geographic distribution of home improvement loans in LMI geographies in the San Diego AA is adequate. The percentage of the Bank's loans in moderate-income geographies is near both the aggregate and the demographic comparators. The percentage of the Bank's loans in low-income CTs is near the aggregate and below the demographic comparators.

The geographic distribution for home refinance loans in LMI geographies in the San Diego AA is adequate. The percentage of the Bank's loans made in low-income CTs is near both the aggregate and the demographic comparators. The percentage of home refinance loans in moderate-income CTs is below both the aggregate and the demographic comparator.

The geographic distribution of multifamily loans in LMI geographies in the San Diego AA is excellent. The percentage of the Bank's loans originated in low-income geographies significantly exceeds both the aggregate and the demographic comparators. The percentage of the Bank's loans in moderate-income CTs is near the aggregate comparator and exceeds the demographic comparator.

### ***Small Loans to Businesses***

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses in the San Diego AA is excellent. The percentage of the Bank's small loans to businesses originated in low-income geographies exceeds the aggregate comparator and is near the demographic comparator. The percentage of the Bank's loans in moderate-income CTs significantly exceeds both the aggregate and the demographic comparators.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of consumer loans.

The geographic distribution of consumer loans in the San Diego AA is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans in both low- and moderate-income geographies. There is no aggregate lending data since lenders are not required to report consumer loans.

### ***Lending Gap Analysis***

We reviewed summary reports and maps and analyzed Bofl's home mortgage and small business lending activities in the San Diego AA over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. The bank's AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude any LMI areas.

### ***Inside/Outside Ratio***

This ratio is a bank-wide calculation and is not calculated by individual AA. Analysis is limited to bank originations and purchases and does not include any affiliate data. The Bank's inside/outside ratio is reasonable based on its business model as an internet bank. For the combined four-year evaluation period, Bofl originated a majority of all loan products outside the bank's AA (99.3 percent). The percentage in number of loans made outside the AA by loan type are as follows: home purchase loans (90.4 percent), home improvement loans (91.8 percent), home refinance loans (91.8 percent), small loans to businesses (96.2 percent), and consumer loans (99.6 percent). In comparison, 99.2 percent of the total number of the Bank's deposits was gathered from individuals and businesses that reside outside the San Diego AA.

### **Distribution of Loans by Income Level of the Borrower**

Overall, the distribution of the Bank's loans to LMI borrowers in the San Diego AA is adequate. The distribution of home mortgage loans is poor, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in Appendix C 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 the Bank's home mortgage loans to LMI borrowers in the San Diego AA is poor. The distribution of home purchase loans is poor; the distribution of home improvement loans is very poor, and the distribution of home refinance loans is poor.

The distribution of home purchase loans to LMI borrowers in the San Diego AA is poor. The portion of home purchase loans to low-income borrowers is below the aggregate comparator

and significantly below the demographic comparator. The portion of home purchase loans to moderate-income borrowers is significantly below both the aggregate and the demographic comparators.

The distribution of home improvement loans to LMI borrowers in the San Diego AA is very poor. The portion of home purchase loans is significantly below both the aggregate and the demographic comparators for loans to both low- and moderate-income borrowers.

The distribution of home refinance loans to LMI borrowers in the San Diego AA is poor. The percentage of home refinance loans to both low- and moderate-income borrowers is below the aggregate. The percentage of these loans to both income groups is significantly below the demographic comparator.

### ***Small Loans to Businesses***

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's originations and purchases of small loans to businesses.

The distribution of the bank's small loans to businesses in the San Diego AA is excellent. The bank's lending to small businesses (businesses with revenues of \$1 million or less) is near the percentage of small businesses in the AA. The distribution by size of the loans shows that a majority percentage of the loan originations are for \$100,000 or less. The bank's lending to businesses with revenues less than \$1 million significantly exceeds the percentage of aggregate lending to small businesses in the AA.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of consumer loans.

The distribution of consumer loans to LMI borrowers in the San Diego AA is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans to both low- and moderate-income borrowers. There is no aggregate lending data since lenders are not required to report consumer loans.

### **Community Development Lending**

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the Bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Bofl provided a total of \$32.1 million in CD loans, which represents over five percent of Tier One Capital. These loans primarily helped provide multifamily housing for LMI individuals and thereby contribute positively to the Bank's overall lending performance.

## **Product Innovation and Flexibility**

During the review period, the Bank did not offer any flexible or innovative loan products.

## **Conclusions for Supplemental AAs Outside the San Diego AA**

Overall, the geographic distribution of the Bank's loans in the supplemental AAs is adequate. In California and Oregon, the geographic distribution is adequate; in Missouri, Nevada, Ohio, and Texas, it is good.

Overall, the borrower distribution of the Bank's loans in the supplemental AAs is adequate. The borrower distribution is adequate in California, Nevada, Ohio, Oregon, and Texas. It is good in Missouri.

### **California**

#### **Distribution of Loans by Income Level of the Geography**

Overall, the geographic distribution of the Bank's loans in California is adequate. The distribution of home mortgage loans is poor, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

#### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of the Bank's home mortgage loans in California is poor. The distribution of home purchase loans is poor, the distribution of home improvement loans is poor, the distribution of home refinance loans is poor, and the distribution of multifamily loans is excellent.

The distribution of home purchase loans in LMI geographies in California is poor. The portion of home purchase loans in low-income CTs is below both the aggregate and the demographic comparators. The portion of these loans in moderate-income CTs is significantly below both the aggregate and the demographic comparators.

The distribution of home improvement loans in LMI geographies in California is poor. The portion of home improvement loans in low-income CTs is below both the aggregate and the demographic comparators. The portion of these loans in moderate-income CTs is below the aggregate comparator and significantly below the demographic comparator.

The distribution of home refinance loans in LMI geographies in California is poor. The portion of home refinance loans in low-income CTs is below both the aggregate and the demographic comparators. The portion of these loans in moderate-income CTs is below the aggregate comparator and significantly below the demographic comparator.

The distribution of multifamily loans in LMI geographies in California is excellent. The portion of the Bank's loans in both low and moderate income CTs is significantly above both the aggregate and the demographic comparators.

### ***Small Loans to Businesses***

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses in LMI geographies in California is excellent. The portion of the Bank's loans in both low- and moderate-income CTs is significantly above both the aggregate and the demographic comparators.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of consumer loans.

The geographic distribution of consumer loans in California is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans in both low- and moderate-income geographies. There is no aggregate lending data since lenders are not required to report consumer loans.

## **Distribution of Loans by Income Level of the Borrower**

Overall, the distribution of the Bank's loans to LMI borrowers in California is adequate. The distribution of home mortgage loans is poor, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in Appendix C 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 the Bank's loans to LMI borrowers in California is poor. The distribution of home purchase loans is very poor, the distribution of home improvement loans is very poor, and the distribution of home refinance loans is poor.

The distribution of home purchase loans to LMI borrowers in California is very poor. The portion of the Bank's loans to both low-and moderate-income borrowers is significantly below both the aggregate and the demographic comparators.

The distribution of home improvement loans to LMI borrowers in California is very poor. The portion of the Bank's loans to both low- and moderate-income borrowers is significantly below both the aggregate and the demographic comparators.

The distribution of home refinance loans to LMI borrowers in California is poor. The Bank's portion of loans to both low- and moderate-income borrowers is well below the aggregate. The



portion of these loans to both low- and moderate-income borrowers is significantly below the demographic comparator.

### ***Small Loans to Businesses***

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's originations and purchases of small loans to businesses.

The distribution of the Bank's small loans to businesses in California is excellent. The bank's lending to small businesses is near the percentage of small businesses in the AA. The distribution by size of the loans shows that a majority percentage of the loan originations are for \$100,000 or less. The bank's lending to businesses with revenues less than \$1 million significantly exceeds the percentage of aggregate lending to small businesses in the AA.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of consumer loans.

The distribution of consumer loans to LMI borrowers in California is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans to both low- and moderate-income borrowers. There is no aggregate lending data since lenders are not required to report consumer loans.

## **Missouri**

### **Distribution of Loans by Income Level of the Geography**

Overall, the geographic distribution of the Bank's loans in Missouri is good. The distribution of home mortgage loans is adequate, the distribution of small loans to businesses is good, and the distribution of consumer loans is excellent.

### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of the Bank's home mortgage loans in Missouri is adequate. The distribution of home purchase loans is adequate, and the distribution of home refinance loans is adequate. The Bank originated only four home improvement loans in Missouri during the evaluation period, which is not enough for a meaningful analysis. The Bank did not originate any multifamily loans during the evaluation period.

The distribution of home purchase loans in LMI geographies in Missouri is adequate. The portion of the Bank's home purchase loans in low-income CTs exceeds both the aggregate and the demographic comparators. The bank did not originate any purchase loans in moderate-income CTs.

The distribution of home refinance loans in LMI geographies in Missouri is adequate. The portion of home refinance loans in low-income CTs exceeds the aggregate comparator and is near the demographic comparator. The portion of home refinance loans in moderate-income CTs is significantly below both the aggregate and the demographic comparators.

### ***Small Loans to Businesses***

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses in LMI geographies in Missouri is good. The portion of the Bank's loans in low-income CTs is near both the aggregate and the demographic comparators. The portion of the Bank's loans in moderate-income CTs significantly exceeds both the aggregate and the demographic comparators.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of consumer loans.

The geographic distribution of consumer loans in Missouri is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans in both low- and moderate-income geographies. There is no aggregate lending data since lenders are not required to report consumer loans.

## **Distribution of Loans by Income Level of the Borrower**

Overall, the distribution of the Bank's loans to LMI borrowers in Missouri is good. The distribution of home mortgage loans is adequate, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in Appendix C 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 the Bank's loans to LMI borrowers in Missouri is adequate. The distribution of home purchase loans is very poor and the distribution of home refinance loans is adequate. The Bank originated only four home improvement loans in Missouri during the evaluation period, which is not enough for a meaningful analysis.

The distribution of home purchase loans to LMI borrowers in Missouri is very poor. Bofl did not originate any home purchase loans to low- or moderate-income borrowers during the evaluation period.

The distribution of home refinance loans to LMI borrowers in Missouri is adequate. The portion of home refinance loans to low-income borrowers is significantly below both the aggregate and

the demographic comparators. The portion of these loans to moderate-income borrowers is near both the aggregate and the demographic comparators.

### ***Small Loans to Businesses***

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's originations and purchases of small loans to businesses.

The distribution of the Bank's small loans to businesses in Missouri is excellent. The bank's lending to small businesses exceeds the percentage of small businesses in the AA. The distribution by size of the loans shows that a substantial majority percentage of the loan originations are for \$100,000 or less. The bank's lending to businesses with revenues less than \$1 million significantly exceeds the percentage of aggregate lending to small businesses in the AA.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of consumer loans.

The distribution of consumer loans to LMI borrowers in Missouri is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans to both low- and moderate-income borrowers. There is no aggregate lending data since lenders are not required to report consumer loans.

## **Nevada**

### **Distribution of Loans by Income Level of the Geography**

Overall, the geographic distribution of the Bank's loans in Nevada is good. The distribution of home mortgage loans is adequate, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of the Bank's home mortgage loans in Nevada is adequate. The distribution of home purchase loans is adequate, the distribution of home improvement loans is very poor, and the distribution of home refinance loans is adequate. The Bank originated only five multifamily loans in Nevada during the evaluation, which is not enough for a meaningful analysis.

The distribution of home purchase loans in LMI geographies in Nevada is adequate. The portion of the Bank's home purchase loans in low-income CTs exceeds the aggregate comparator and is near the demographic comparator. The portion of the Bank's home

purchase loans in moderate-income CTs is below the aggregate comparator and significantly below the demographic comparator.

The Bank did not originate any home improvement loans in either low- or moderate-income geographies in Nevada, demonstrating very poor performance.

The distribution of home refinance loans in LMI geographies in Nevada is adequate. The portion of home refinance loans originated in low-income CTs exceeds the aggregate comparator and is near the demographic comparator. The portion of these loans in moderate-income CTs is significantly below both the aggregate and the demographic comparators.

### ***Small Loans to Businesses***

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses in LMI geographies in Nevada is excellent. The portion of the Bank's loans in low-income CTs exceeds the aggregate comparator and is near the demographic comparator. The portion of the Bank's loans in moderate-income CTs significantly exceeds both the aggregate and the demographic comparators.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of consumer loans.

The geographic distribution of consumer loans in Nevada is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans in both low and moderate income geographies. There is no aggregate lending data since lenders are not required to report consumer loans.

## **Distribution of Loans by Income Level of the Borrower**

Overall, the distribution of the Bank's loans to LMI borrowers in Nevada is adequate. The distribution of home mortgage loans is very poor, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in Appendix C 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 the Bank's loans to LMI borrowers in Nevada is very poor. The distribution of home purchase loans is very poor, the distribution of home improvement loans is very poor, and the distribution of home refinance loans is very poor.

The distribution of home purchase loans to LMI borrowers in Nevada is very poor. The portion of the Bank's loans to both low- and moderate-income borrowers is significantly below both the aggregate and the demographic comparators.

The distribution of home improvement loans to LMI borrowers in Nevada is very poor. The Bank did not originate any home improvement loans to low-income borrowers. The portion of the Bank's loans to moderate-income borrowers is significantly below both the aggregate and the demographic comparators.

The distribution of home refinance loans to LMI borrowers in Nevada is very poor. The portion of the Bank's loans to both low- and moderate-income borrowers is significantly below both the aggregate and the demographic comparators.

### ***Small Loans to Businesses***

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's originations and purchases of small loans to businesses.

The distribution of the Bank's small loans to businesses is excellent. The bank's lending to small businesses is near the percentage of small businesses in the AA. The distribution by size of the loans shows that a majority percentage of the loan originations are for \$100,000 or less. The bank's lending to businesses with revenues less than \$1 million significantly exceeds the percentage of aggregate lending to small businesses in the AA.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of consumer loans.

The distribution of consumer loans to LMI borrowers in Nevada is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans to both low- and moderate-income borrowers. There is no aggregate lending data since lenders are not required to report consumer loans.

## **Ohio**

### **Distribution of Loans by Income Level of the Geography**

Overall, the geographic distribution of the Bank's loans in Ohio is good. The distribution of home mortgage loans is adequate, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of the Bank's home mortgage loans in Ohio is adequate. The bank originated only 13 home purchase loans, six home improvement loans, and three multifamily loans in Ohio during the evaluation period, which is not enough for meaningful analysis.

The distribution of home refinance loans in LMI geographies in Ohio is adequate. The portion of the Bank's refinance loans in low-income CTs exceeds the aggregate comparator and is near the demographic comparator. The portion of these loans in moderate-income CTs is significantly below both the aggregate and the demographic comparators.

### ***Small Loans to Businesses***

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses in LMI geographies in Ohio is excellent. The portion of the Bank's loans in both low- and moderate-income CTs exceeds both the aggregate and the demographic comparators.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of consumer loans.

The geographic distribution of consumer loans in Ohio is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans in both low- and moderate-income geographies. There is no aggregate lending data since lenders are not required to report consumer loans.

## **Distribution of Loans by Income Level of the Borrower**

Overall, the distribution of the Bank's loans to LMI borrowers in Ohio is adequate. The distribution of home mortgage loans is very poor, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in Appendix C 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 the Bank's loans to LMI borrowers in Ohio is very poor. The distribution of home refinance loans is very poor. The bank originated only 13 home purchase loans and six home improvement loans in Ohio during the evaluation period, which is not enough for meaningful analysis.

The distribution of home refinance loans to LMI borrowers in Ohio is very poor. The portion of the Bank's loans to LMI borrowers is significantly below both the aggregate and the demographic comparators.

### ***Small Loans to Businesses***

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's originations and purchases of small loans to businesses.

The distribution of the Bank's small loans to businesses in Ohio is excellent. The bank's lending to small businesses exceeds the percentage of small businesses in the AA. The distribution by size of the loans shows that a substantial majority percentage of the loan originations are for \$100,000 or less. The bank's lending to businesses with revenues less than \$1 million significantly exceeds the percentage of aggregate lending to small businesses in the AA.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of consumer loans.

The distribution of consumer loans to LMI borrowers in Ohio is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans to both low- and moderate-income borrowers. There is no aggregate lending data since lenders are not required to report consumer loans.

## **Oregon**

### **Distribution of Loans by Income Level of the Geography**

Overall, the geographic distribution of the Bank's loans in Oregon is adequate. The distribution of home mortgage loans is poor, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

#### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of the Bank's home mortgage loans in Oregon is poor. The distribution of home purchase loans is poor, the distribution of home improvement loans is good, and the distribution of home refinance loans is poor. The Bank originated only 10 multifamily loans in Oregon during the evaluation, which is not enough for a meaningful analysis.

The distribution of home purchase loans in LMI geographies in Oregon is poor. The Bank did not originate any home purchase loans in low-income CTs. The portion of the Bank's loans in moderate-income CTs is significantly below both the aggregate and the demographic comparators.

The distribution of home improvement loans in LMI geographies in Oregon is good. The Bank did not make any home improvement loans in low-income CTs. However, the portion of these loans in moderate-income CTs significantly exceeds both the aggregate and the demographic comparators.

The distribution of home refinance loans in LMI geographies in Oregon is poor. The Bank did not originate any home refinance loans in low-income geographies. The portion of the Bank's loans in moderate-income geographies is significantly below both the aggregate and the demographic comparators.

### ***Small Loans to Businesses***

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses in LMI geographies in Oregon is excellent. The portion of the Bank's loans in both low and moderate income CTs significantly exceeds both the aggregate and the demographic comparators.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of consumer loans.

The geographic distribution of consumer loans in Oregon is excellent. The percentage of the Bank's consumer loans exceeds the demographic comparator for loans in low-income geographies and significantly exceeds the demographic comparator in moderate-income geographies. There is no aggregate lending data since lenders are not required to report consumer loans.

## **Distribution of Loans by Income Level of the Borrower**

Overall, the distribution of the Bank's loans to LMI borrowers in Oregon is adequate. The distribution of home mortgage loans is poor, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in Appendix C 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 the Bank's loans to LMI borrowers in Oregon is poor. The distribution of home purchase loans is poor, the distribution of home improvement loans is poor, and the distribution of home refinance loans is poor.

The distribution of the Bank's home purchase loans to LMI borrowers in Oregon is poor. The portion of the Bank's home purchase loans to low-income borrowers is near the aggregate and



significantly below the demographic comparator. The portion of these loans to moderate-income borrowers is significantly below both the aggregate and the demographic comparators.

The distribution of the Bank's home improvement loans to LMI borrowers in Oregon is poor. The Bank's did not originate any home improvement loans to low-income borrowers. The portion of these loans to moderate-income borrowers is below both the aggregate and the demographic comparators.

The distribution of the Bank's home refinance loans to LMI borrowers in Oregon is poor. The portion of the Bank's loans to both low- and moderate-income borrowers is significantly below both the aggregate and the demographic comparators.

### ***Small Loans to Businesses***

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's originations and purchases of small loans to businesses.

The distribution of the Bank's small loans to businesses in Oregon is excellent. The bank's lending to small businesses is near the percentage of small businesses in the AA. The distribution by size of the loans shows that a substantial majority percentage of the loan originations are for \$100,000 or less. The bank's lending to businesses with revenues less than \$1 million significantly exceeds the percentage of aggregate lending to small businesses in the AA.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of consumer loans.

The distribution of consumer loans to LMI borrowers in Oregon is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans to both low- and moderate-income borrowers. There is no aggregate lending data since lenders are not required to report consumer loans.

## **Texas**

### **Distribution of Loans by Income Level of the Geography**

Overall, the geographic distribution of the Bank's loans in Texas is good. The distribution of home mortgage loans is poor, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of the Bank's home mortgage loans in Texas is poor. The distribution of home purchase loans is poor, the distribution of home improvement loans is poor, the distribution of home refinance loans is poor, and the distribution of multifamily loans is excellent.

The geographic distribution of home purchase loans in LMI geographies in Texas is poor. The Bank did not originate any home purchase loans in low-income CTs, which is below the aggregate and the demographic comparators. The portion of these loans in moderate-income CTs is near the aggregate comparator and significantly below the demographic comparator.

The geographic distribution of home improvement loans in LMI geographies in Texas is poor. The Bank did not originate any home improvement loans in low-income CTs, which is below both the aggregate and demographic comparators. The portion of these loans in moderate-income CTs is near the aggregate comparator and significantly below the demographic comparator.

The distribution of home refinance loans in LMI geographies in Texas is poor. The distribution of home refinance loans in low-income CTs is near the aggregate comparator and below the demographic comparator. The portion of these loans in moderate-income CTs is significantly below both the aggregate and the demographic comparators.

The distribution of multifamily loans in LMI geographies in Texas is excellent. The portion of the Bank's loans is significantly above both the aggregate and the demographic comparators in low-income CTs. The distribution is also near both the aggregate and the demographic comparators in moderate-income CTs.

### ***Small Loans to Businesses***

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses in Texas is excellent. The percentage of the Bank's small loans to businesses originated in LMI geographies exceeds both the aggregate and the demographic comparators.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of consumer loans.

The geographic distribution of consumer loans in Texas is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans in both low- and moderate-income geographies. There is no aggregate lending data since lenders are not required to report consumer loans.

## **Distribution of Loans by Income Level of the Borrower**

Overall, the distribution of the Bank's loans to LMI borrowers in Texas is adequate. The distribution of home mortgage loans is very poor, the distribution of small loans to businesses is excellent, and the distribution of consumer loans is excellent.

### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in Appendix C 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 the Bank's loans to LMI borrowers in Texas is very poor. The distribution of home purchase loans is very poor, the distribution of home improvement loans is poor, and the distribution of home refinance loans is very poor.

The distribution of home purchase loans to LMI borrowers in Texas is very poor. The portion of the Bank's loans to LMI borrowers is significantly below both the aggregate and the demographic comparators.

The distribution of home improvement loans to LMI borrowers in Texas is poor. The percentage of the Bank's loans to low-income borrowers is near the aggregate comparator and significantly below the demographic comparator. The percentage of the Bank's loans to moderate-income borrowers is significantly below both the aggregate and the demographic comparators.

The distribution of home refinance loans to LMI borrowers in Texas is very poor. The portion of the Bank's loans to LMI borrowers is significantly below both the aggregate and the demographic comparator.

### ***Small Loans to Businesses***

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's originations and purchases of small loans to businesses.

The distribution of the Bank's small loans to businesses in Texas is excellent. The bank's lending to small businesses is near the percentage of small businesses in the AA. The distribution by size of the loans shows that a majority percentage of the loan originations are for \$100,000 or less. The bank's lending to businesses with revenues less than \$1 million significantly exceeds the percentage of aggregate lending to small businesses in the AA.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of consumer loans.

The distribution of consumer loans to LMI borrowers in Texas is excellent. The percentage of the Bank's consumer loans significantly exceeds the demographic comparator for loans to both

low- and moderate-income borrowers. There is no aggregate lending data since lenders are not required to report consumer loans.

## INVESTMENT TEST

Bofl's performance under the Investment Test is rated "Outstanding."

### Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in Appendix C for the facts and data used to evaluate the Bank's level of qualified investments.

Based on a full-scope review, the Bank's performance in the San Diego AA is excellent.

During the evaluation period, Bofl made 33 investments totaling \$37.5 million with \$35.8 million currently funded. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had within the AA. The remaining balance on 10 prior period investments as of the date of our examination was \$30.3 million. Bofl also made four qualifying CD investments totaling \$11.4 million in the broader statewide area. When considering these investments, along with all the investments in the Bank's AA, the total amount represents 12.2 percent of Tier One Capital. The investments are non-complex, but responsive to identified needs for affordable housing and community services for LMI individuals. Examples of community development investments during the evaluation period include:

- \$28 million invested in bonds that provide essential community needs that benefit LMI individuals in the San Diego AA.
- \$7 million in Community Development Financial Institution (CDFI) investments in a company that provides consumer loans to underserved communities both in the San Diego AA and statewide.
- \$3 million investment in a low-income housing tax credit for affordable housing.
- \$2 million in Small Business Investment Company (SBIC) investments that promote economic development by financing small businesses in the San Diego AA.
- \$747 thousand in deposits at various minority-owned depository institutions.
- Over \$66 thousand in donations to various organizations that primarily provide target services to LMI individuals throughout the AA. The Bank made the largest donation to an organization that provides services that primarily benefit disadvantaged inner-city youth by supporting financial literacy and entrepreneurship programs.

## **SERVICE TEST**

The Bank's performance under the Service Test is rated "High Satisfactory."

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, Bofl's performance in the San Diego AA is good.

#### **Retail Banking Services**

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

Bofl's branch location is reasonably accessible to geographies and individuals of different income levels in the San Diego AA. The Bank's main office is located in an upper-income CT, but it is accessible to LMI individuals who work in the numerous businesses located in the area. Customers are able to make deposits, withdraw funds, and make loan payments. The branch business hours are Monday through Friday 9:00 AM to 5:00 PM. The Bank also has a full-service 24-hour ATM.

#### **Alternate Delivery Systems**

Bofl is primarily an internet bank with the majority of services offered nationwide via the internet and mobile banking applications. Through the internet, customers can establish a deposit relationship, apply for lending products, transfer funds, conduct bill payment transactions, have the ability to deposit checks from home or office with "MyDeposit," and conduct free person-to-person fund transfers with "Popmoney." The Bank offers free mobile banking with many of the same features available through online banking, including free "Mobile Deposit," which allows customers to deposit checks through their mobile phone or tablet. ATM service fees are reimbursed for most U.S. domestic ATMs depending upon the type of account held at the Bank or products used. Additionally, the Bank provides 24-hour automated telephone banking services. Internet and mobile banking services are accessible to anyone who has access to a computer or a compatible mobile phone device. However, Bofl does not have specific information available that indicates the extent to which LMI individuals use the Bank's alternate delivery channels.

Bofl offers additional products with features that may benefit LMI and under-banked individuals. The Bank provides payroll debit cards for various employers in a variety of industries and companies. Employees who do not have bank accounts are able to access their wages with the payroll debit cards and avoid paying check-cashing fees. This also provides access to online purchases, bill payment, and other financial services and offers protection against unauthorized usage. Additionally, the Bank offers a "second chance" bank account for customers who are unable to obtain checking or savings accounts at other institutions. Consumers then have increased access to financial services with potentially lower cost. While these products may likely benefit LMI individuals, we do not have the data to confirm this.

## **Community Development Services**

Bofl provides a good level of CD services. During the evaluation period, 128 employees provided approximately 1,248 hours of service to organizations that benefit LMI individuals in the AA through community services, economic development, and affordable housing. Examples of the bank's CD services include:

- Eighty-nine bank employees volunteered to be instructors to provide a "real world" financial education to students from LMI households in the AA.
- Fifty-three bank employees volunteered to provide financial literacy education through a non-profit organization that works to reach San Diego's disadvantaged youth.
- Two bank officers serve as board members for a non-profit organization that provides health services to low-income families and children throughout the AA.
- A bank officer serves on two committees for a non-profit CD organization that helps promote neighborhood revitalization.
- A senior executive officer serves as a board member and treasurer for a non-profit organization that provides community services to LMI elderly individuals.

## 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 1/1/12 to 12/31/15 Investment and Service Tests and CD Loans: 5/20/13 to 6/6/16	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
BofI Federal Bank (BofI) San Diego, CA	Home Mortgage Loans Small Loans to Businesses Consumer Loans CD Loans, Investments, and Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	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 Diego-Carlsbad, CA MSA #41740 (San Diego AA)  Supplemental AAs <ul style="list-style-type: none"><li>• California</li><li>• Missouri</li><li>• Nevada</li><li>• Ohio</li><li>• Oregon</li><li>• Texas</li></ul> Reno, NV MSA #39900	Full-Scope Review  Expanded Review	We did not evaluate the Reno, NV MSA AA since the branch was only open four months out of our lending evaluation period.



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

### San Diego-Carlsbad CA MSA

Demographic Information for Full Scope Area: San Diego-Carlsbad CA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	628	10.03	21.34	36.15	31.53	0.96
Population by Geography	3,095,313	9.80	21.57	35.24	33.05	0.33
Owner-Occupied Housing by Geography	593,945	3.31	14.32	38.78	43.59	0.00
Business by Geography	263,161	5.79	15.55	35.28	43.27	0.12
Farms by Geography	5,012	3.73	16.20	38.95	41.12	0.00
Family Distribution by Income Level	703,747	22.36	17.55	18.75	41.34	0.00
Distribution of LMI Families throughout AA Geographies	280,889	16.43	31.05	33.90	18.62	0.00
MFI HUD Adjusted MFI for 2015 Households Below Poverty Level		73,560 72,700 11%	Median Housing Value Unemployment Rate (2010 US Census)	496,417 3.78%		

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 U.S. Census and 2015 HUD updated MFI

This San Diego-Carlsbad CA MSA represents Boff's only AA for this evaluation. The Bank operates one branch and one ATM in this AA. The bank has another branch in Reno, Nevada that was opened on August 31, 2015 but it was not included in our evaluation because it was open only four months in 2015.

Based on the 2010 U.S. Census data, the San Diego-Carlsbad CA MSA consists of 628 CTs in one county – San Diego County. There are 63 low-income CTs, 134 moderate-income CTs, 227 middle-income CTs, 198 upper-income CTs, and six CTs with no income data available. Low- and moderate-income CTs account for 10.0 per cent and 21.3 per cent, respectively, of the total number of tracts in this AA. The San Diego-Carlsbad CA MSA is the 17<sup>th</sup> most populous MSA in the U.S., with a population of almost 3.1 million based on 2010 U.S. Census data. It is the second largest MSA in California. The area has a large population of military personnel. A number of U.S. naval bases and stations, as well as the Naval Medical Center San Diego are located in the MSA. The U.S. Marine Corps and the U.S. Coast Guard also have a large presence.

According to the Employment Development Department of California, the unemployment rate in San Diego peaked in 2010 at 11.1 per cent, but has declined steadily every year since and is currently at 4.2 percent. In comparison, the unemployment rate in California is currently at 4.7 percent. The MSA's main economic drivers include military and defense related activities, biotechnology, tourism, international trade, and manufacturing. The area's largest employers include the U.S. Marine Corps., U.S. Navy, University of California San Diego (UCSD), UCSD Medical Center, Kaiser Permanente, Scripps Clinics, Sea World, and Qualcomm.

The June 30, 2015 FDIC Summary of Deposits indicates there is significant banking competition in the AA. There are forty-nine chartered banks operating 608 branches in the San Diego-Carlsbad MSA. This includes Wells Fargo Bank, N.A., MUFG Union Bank, N.A., Bank of America, N.A., and JP Morgan Chase Bank, N.A., which have the largest deposit share, with combined deposits of \$48.5 billion representing 65.7 percent of total deposits. In comparison, BofI ranks fifth and has a 6.1 percent market share with \$4.5 billion in deposits.

The 2010 Census median housing value was \$496,417. Approximately, 51.4 percent of all housing units are owner-occupied. The 2015 Federal Financial Institutions Examination Council (FFIEC) MSA MFI was \$73,500. According to the National Association of Realtors, the median home price in 2015 was \$542,600, having increased by 55 percent from \$349,000 in 2012. San Diego has the 10<sup>th</sup> least affordable housing market in the U.S.

## Appendix C: Tables of Performance Data

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### Content of Standardized 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 loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this Performance Evaluation.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/AA. Community development loans to statewide or regional entities or made outside the bank’s AA may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/AA. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size)

throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table 8. Borrower Distribution of Home Purchase Loans** - 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/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/AA.

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's AA. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments

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

**Table 1. Lending Volume**

LENDING VOLUME		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area (2015):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
San Diego-Carlsbad CA MSA	100.00	1,321	778,716	711	40,675	0	0	35	32,065	2,067	851,456	100.00

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2015.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						
Assessment Area (2015):	% of Rated Area Loans (#) in MA/AA <sup>*</sup>	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA <sup>**</sup>
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
San Diego-Carlsbad CA MSA	100.00	2,275	2,182	0	0	0	0	0	0	0	0	0	0	100.00

<sup>\*</sup> Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

<sup>\*\*</sup> The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2015.

<sup>\*\*\*</sup> Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015	
Assessment Area (2015):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
San Diego-Carlsbad CA MSA	2,275	2,182	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2015.



**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE 2015		Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
San Diego-Carlsbad CA MSA	450	100.00	3.31	1.11	14.32	4.89	38.78	21.33	43.59	72.67	3.59	13.47	37.76	45.18

\* Based on 2014 Peer Mortgage Data – U.S. and Puerto Rico

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT 2015		Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income <sup>*</sup>			
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
San Diego-Carlsbad CA MSA	78	100.00	3.31	1.28	14.32	10.26	38.78	29.49	43.59	58.97	2.85	12.57	40.56	44.02

<sup>\*</sup> Based on 2014 Peer Mortgage Data – U.S. and Puerto Rico

<sup>\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE 31, 2015			Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2012 TO DECEMBER			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
San Diego-Carlsbad CA MSA	654	100.00	3.31	2.60	14.32	6.57	38.78	28.44	43.59	62.39	3.01	12.99	37.89	46.11

\* Based on 2014 Peer Mortgage Data – U.S. and Puerto Rico

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units**	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
San Diego-Carlsbad CA MSA	139	100.00	14.62	42.45	26.63	30.22	33.39	17.99	25.36	9.35	33.25	32.40	24.36	9.99

\* Based on 2014 Peer Mortgage Data – U.S. and Puerto Rico

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2015		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2012 TO						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income <sup>*</sup>			
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
San Diego-Carlsbad CA MSA	711	100.00	5.79	5.34	15.55	19.97	35.28	41.35	43.27	33.33	4.83	14.60	34.13	46.44

<sup>\*</sup> Based on 2014 Peer Small Business Data – U.S. and Puerto Rico

<sup>\*\*</sup> Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2015).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS 2015			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
San Diego-Carlsbad CA MSA	0	0.00	3.73	0.00	16.20	0.00	38.95	0.00	41.12	0.00	1.54	14.29	28.96	55.21

\* Based on 2014 Peer Small Business Data -- U.S. and Puerto Rico

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2015).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data <sup>*</sup>			
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>1</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	Low	Mod	Mid	Upp
<b>Full Review:</b>														
San Diego-Carlsbad CA MSA	450	100.00	22.36	0.00	17.55	1.56	18.75	6.00	41.34	92.44	1.34	8.48	22.89	67.29

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- U.S. and Puerto Rico

<sup>\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>1</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT 2015		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data <sup>*</sup>			
	#	% of Total <sup>**</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>2</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup> **	% BANK Loans <sup>****</sup>	% Families <sup>*</sup> **	% BANK Loans <sup>****</sup>	Low	Mod	Mid	Upp
<b>Full Review:</b>														
San Diego-Carlsbad CA MSA	78	100.00	22.36	0.00	17.55	5.13	18.75	21.79	41.34	73.08	17.03	9.10	18.68	55.19

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- U.S. and Puerto Rico

<sup>\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>2</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE 31, 2015		Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data <sup>*</sup>			
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>3</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	Low	Mod	Mid	Upp
<b>Full Review:</b>														
San Diego-Carlsbad CA MSA	654	100.00	22.36	1.99	17.55	7.95	18.75	18.04	41.34	72.02	4.06	10.59	21.31	64.04

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- U.S. and Puerto Rico

<sup>\*\*</sup> Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>3</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES 31, 2015			Geography: CALIFORNIA		Evaluation Period: JANUARY 1, 2012 TO DECEMBER				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
San Diego-Carlsbad CA MSA	711	100.00	80.26	70.60	86.78	12.80	0.42	78,209	37,125

\* Based on 2014 Peer Small Business Data -- U.S. and Puerto Rico

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source Dun & Bradstreet - 2015).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS 2015		Geography: CALIFORNIA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
San Diego-Carlsbad CA MSA	0	0.00	94.71	0.00	0.00	0.00	0.00	272	133

\* Based on 2014 Peer Small Business Data -- U.S. and Puerto Rico

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source Dun & Bradstreet - 2015).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution’s Option)**

Geographic and Borrower Distribution: CONSUMER LOANS 31, 2015		Geography: CALIFORNIA										Evaluation Period: JANUARY 1, 2012 TO DECEMBER							
Assessment Area:	Geographic Distribution										Borrower Distribution								
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds*	% of BANK Loans	
<b>Full Review:</b>																			
San Diego-Carlsbad CA MSA	2,275	100.00	8.47	26.55	20.15	36.84	36.63	29.89	34.75	6.73	23.71	76.70	16.60	18.64	17.75	3.52	41.94	1.14	

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census information.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: CALIFORNIA				Evaluation Period: MAY 20, 2013 TO JUNE 6, 2016			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
San Diego-Carlsbad CA MSA	0	30,294	33	35,842	43	66,136	85.28	2	1,652
Regional or Statewide	0	0	4	11,415	4	11,415	14.72	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS TO JUNE 6, 2016								Geography: CALIFORNIA				Evaluation Period: MAY 20, 2013					
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
San Diego-Carlsbad CA MSA	100.00	0	100.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	9.80	21.57	35.24	33.05

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM				Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015									
Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
San Diego-Carlsbad CA MSA	100.00	0	100.00	0	0	0	100.00	0	100.00	0	0	0	100.00	9.80	21.57	35.24	33.05

**Table 1a. Lending Volume**

LENDING VOLUME DECEMBER 31, 2015		Geography: SUPPLEMENTAL ASSESSMENT AREAS								Evaluation Period: JANUARY 1, 2012 TO		
Assessment Area (2015):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
California	77.75	6,254	4,547,858	6,962	375,108	0	0	0	0	13,216	4,922,966	0.00
Missouri	1.18	71	11,896	129	4,581	0	0	0	0	200	16,477	0.00
Nevada	5.98	374	126,689	643	32,277	0	0	0	0	1,017	158,966	0.00
Ohio	2.01	95	19,198	246	7,531	0	0	0	0	341	26,729	0.00
Oregon	2.81	300	89,870	177	8,016	0	0	0	0	477	97,886	0.00
Texas	10.28	575	166,856	1,173	65,032	0	0	0	0	1,748	231,888	0.00

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2015.

\*\*\* Deposit Data as of June 09, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.



**Table 1a. Other Products**

LENDING VOLUME DECEMBER 31, 2015		Geography: SUPPLEMENTAL ASSESSMENT AREAS								Evaluation Period: JANUARY 1, 2012 TO				
Assessment Area (2015):	% of Rated Area Loans (#) in MA/AA	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposit s in MA/AA**
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
California	17.90	20,917	19,860	0	0	0	0	0	0	0	0	0	0	0.00
Missouri	14.43	16,863	15,835	0	0	0	0	0	0	0	0	0	0	0.00
Nevada	2.58	3,015	2,863	0	0	0	0	0	0	0	0	0	0	0.00
Ohio	29.91	34,945	32,385	0	0	0	0	0	0	0	0	0	0	0.00
Oregon	3.80	4,436	4,182	0	0	0	0	0	0	0	0	0	0	0.00
Texas	31.37	36,655	35,216	0	0	0	0	0	0	0	0	0	0	0.00

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2015.

\*\*\* Deposit Data as of June 09, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1a. Other Products**

LENDING VOLUME DECEMBER 31, 2015		Geography: SUPPLEMENTAL ASSESSMENT AREAS		Evaluation Period: JANUARY 1, 2012 TO	
Assessment Area (2015):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
California	20,917	19,860	0	0	0
Missouri	16,863	15,835	0	0	0
Nevada	3,015	2,863	0	0	0
Ohio	34,945	32,385	0	0	0
Oregon	4,436	4,182	0	0	0
Texas	36,655	35,216	0	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2015.

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE 2012 TO DECEMBER 31, 2015		Geography: SUPPLEMENTAL ASSESSMENT AREAS									Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015			
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
California	2,002	85.16	2.71	0.90	17.85	4.35	37.32	18.78	42.12	75.97	2.97	17.50	36.72	42.82
Missouri	17	0.72	2.84	5.88	15.80	0.00	54.86	47.06	26.50	47.06	1.24	12.00	52.01	34.75
Nevada	97	4.13	1.94	1.03	16.06	6.19	46.71	28.87	35.29	63.92	0.94	10.26	46.42	42.38
Ohio	13	0.55	3.66	0.00	15.46	0.00	49.73	23.08	31.15	76.92	1.66	11.34	46.68	40.32
Oregon	69	2.93	0.76	0.00	14.27	5.80	59.29	44.93	25.68	49.28	0.99	14.55	56.53	27.93
Texas	153	6.51	3.52	0.00	19.66	7.19	39.71	24.84	37.11	67.97	1.56	10.93	36.31	51.20

\* Based on 2014 Peer Mortgage Data -- U.S. and Puerto Rico

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT 1, 2012 TO DECEMBER 31, 2015		Geography: SUPPLEMENTAL ASSESSMENT AREAS									Evaluation Period: JANUARY			
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income <sup>*</sup>			
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
California	415	82.18	2.71	1.45	17.85	9.16	37.32	27.47	42.12	61.93	2.35	14.76	36.36	46.53
Missouri	4	0.79	2.84	0.00	15.80	0.00	54.86	50.00	26.50	50.00	2.41	14.83	55.58	27.19
Nevada	23	4.55	1.94	0.00	16.06	0.00	46.71	34.78	35.29	65.22	0.92	10.25	40.81	48.03
Ohio	6	1.19	3.66	0.00	15.46	16.67	49.73	0.00	31.15	83.33	3.04	13.93	50.83	32.21
Oregon	25	4.95	0.76	0.00	14.27	20.00	59.29	48.00	25.68	32.00	0.80	14.78	57.90	26.52
Texas	32	6.34	3.52	0.00	19.66	9.38	39.71	25.00	37.11	65.63	2.41	14.19	35.05	48.35

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- U.S. and Puerto Rico

<sup>\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

<sup>\*\*\*\*</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2012 TO DECEMBER 31, 2015			Geography: SUPPLEMENTAL ASSESSMENT AREAS								Evaluation Period:			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
California	2,668	74.38	2.71	0.90	17.85	8.36	37.32	27.29	42.12	63.46	2.25	15.00	36.20	46.55
Missouri	50	1.39	2.84	2.00	15.80	2.00	54.86	46.00	26.50	50.00	1.61	12.52	51.61	34.26
Nevada	249	6.94	1.94	1.20	16.06	3.61	46.71	30.52	35.29	64.66	0.82	9.29	44.26	45.62
Ohio	73	2.04	3.66	2.74	15.46	5.48	49.73	19.18	31.15	72.60	2.00	12.08	47.58	38.34
Oregon	196	5.46	0.76	0.00	14.27	9.18	59.29	48.98	25.68	41.84	0.76	15.18	56.57	27.49
Texas	351	9.79	3.52	1.14	19.66	3.42	39.71	24.50	37.11	70.94	1.69	11.54	35.68	51.09

\* Based on 2014 Peer Mortgage Data -- U.S. and Puerto Rico

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY 2012 TO DECEMBER 31, 2015			Geography: SUPPLEMENTAL ASSESSMENT AREAS								Evaluation Period: JANUARY 1,			
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% of MF Units***	% BANK Loans***	% MF Units** *	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
California	1,164	95.33	13.66	19.50	31.21	45.79	30.85	19.76	24.28	14.95	15.88	39.05	26.09	18.98
Missouri	0	0.00	12.26	0.00	23.94	0.00	39.88	0.00	23.92	0.00	13.30	28.85	38.14	19.71
Nevada	5	0.41	14.39	0.00	40.99	80.00	34.09	20.00	10.52	0.00	22.13	39.34	31.15	7.38
Ohio	3	0.25	14.88	0.00	26.76	33.33	39.71	33.33	18.66	33.33	11.92	26.99	41.82	19.28
Oregon	10	0.82	5.07	0.00	29.89	70.00	45.12	10.00	19.92	20.00	3.47	38.54	42.36	15.63
Texas	39	3.19	18.17	25.64	29.34	25.64	29.20	30.77	23.29	17.95	16.76	30.25	31.67	21.32

\* Based on 2014 Peer Mortgage Data -- U.S. and Puerto Rico

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of multifamily Units is the number of multifamily units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2012 TO DECEMBER 31, 2015		Geography: SUPPLEMENTAL ASSESSMENT AREAS									Evaluation Period:			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
California	6,906	74.59	6.45	8.44	20.21	25.14	33.24	34.84	39.55	31.58	5.84	19.06	32.91	42.19
Missouri	129	1.39	4.78	3.88	17.36	22.48	49.17	58.14	28.59	15.50	4.25	16.10	46.48	33.17
Nevada	630	6.80	5.41	4.29	21.66	25.40	42.15	43.02	29.89	27.30	3.89	18.43	41.82	35.85
Ohio	246	2.66	6.13	6.91	16.87	19.11	43.58	43.90	33.26	30.08	5.34	15.88	41.68	37.09
Oregon	177	1.91	3.30	3.95	19.30	27.12	52.11	48.59	25.22	20.34	3.03	18.84	51.17	26.95
Texas	1,171	12.65	6.10	7.77	19.30	22.80	33.49	36.55	40.95	32.88	6.15	18.12	32.23	43.50

\* Based on 2014 Peer Small Business Data -- U.S. and Puerto Rico

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2015).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS 1, 2012 TO DECEMBER 31, 2015			Geography: SUPPLEMENTAL ASSESSMENT AREAS								Evaluation Period: JANUARY			
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*			
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
<b>Full Review:</b>														
California	0	0.00	3.19	0.00	18.76	0.00	40.88	0.00	37.05	0.00	2.52	15.66	46.45	35.37
Missouri	0	0.00	0.76	0.00	11.35	0.00	66.63	0.00	21.23	0.00	0.11	9.55	73.84	16.50
Nevada	0	0.00	2.86	0.00	16.24	0.00	50.86	0.00	29.72	0.00	1.59	6.67	68.25	23.49
Ohio	0	0.00	1.29	0.00	8.77	0.00	60.43	0.00	29.50	0.00	0.20	3.72	68.64	27.43
Oregon	0	0.00	0.85	0.00	9.76	0.00	68.30	0.00	21.08	0.00	0.19	4.59	77.63	17.59
Texas	0	0.00	2.65	0.00	14.04	0.00	47.04	0.00	36.25	0.00	0.68	8.52	60.95	29.85

\* Based on 2014 Peer Small Business Data -- U.S. and Puerto Rico

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2015).



**Table 8a. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE TO DECEMBER 31, 2015		Geography: SUPPLEMENTAL ASSESSMENT AREAS										Evaluation Period: JANUARY 1, 2012			
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>4</sup>	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Low	Mod	Mid	Upp	
<b>Full Review:</b>															
California	2,005	85.17	22.86	0.15	16.91	0.90	18.92	6.03	41.30	92.92	2.35	11.38	22.66	63.61	
Missouri	17	0.72	20.56	0.00	18.06	0.00	21.67	17.65	39.70	82.35	11.36	25.05	24.91	38.69	
Nevada	97	4.12	20.36	1.03	17.91	5.15	21.87	8.25	39.86	85.57	5.21	21.19	26.05	47.55	
Ohio	13	0.55	20.77	0.00	17.71	0.00	21.24	46.15	40.28	53.85	9.45	24.86	25.25	40.44	
Oregon	69	2.93	20.49	2.90	17.90	4.35	21.31	8.70	40.30	84.06	3.59	17.42	26.73	52.26	
Texas	153	6.50	22.78	1.96	16.91	5.23	18.70	7.84	41.61	84.97	3.84	15.19	23.01	57.96	

\* Based on 2014 Peer Mortgage Data -- U.S. and Puerto Rico

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>4</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT 2012 TO DECEMBER 31, 2015		Geography: SUPPLEMENTAL ASSESSMENT AREAS									Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015			
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data <sup>*</sup>			
	#	% of Total <sup>**</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>5</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	% Families <sup>*</sup>	% BANK Loans <sup>****</sup>	Low	Mod	Mid	Upp
<b>Full Review:</b>														
California	415	82.18	22.86	1.20	16.91	6.75	18.92	13.25	41.30	78.80	5.75	11.78	21.07	61.40
Missouri	4	0.79	20.56	0.00	18.06	0.00	21.67	25.00	39.70	75.00	12.52	20.03	24.27	43.18
Nevada	23	4.55	20.36	0.00	17.91	4.35	21.87	21.74	39.86	73.91	9.79	16.02	23.73	50.47
Ohio	6	1.19	20.77	0.00	17.71	16.67	21.24	16.67	40.28	66.67	11.66	21.15	24.44	42.75
Oregon	25	4.95	20.49	0.00	17.90	12.00	21.31	28.00	40.30	60.00	5.23	16.43	27.29	51.05
Texas	32	6.34	22.78	6.25	16.91	3.13	18.70	18.75	41.61	71.88	7.95	11.62	17.41	63.01

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- U.S. and Puerto Rico

<sup>\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>5</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10a. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE JANUARY 1, 2012 TO DECEMBER 31, 2015		Geography: SUPPLEMENTAL ASSESSMENT AREAS										Evaluation Period:			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>6</sup>	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Low	Mod	Mid	Upp	
<b>Full Review:</b>															
California	2,669	74.39	22.86	1.87	16.91	7.98	18.92	15.96	41.30	74.19	4.65	11.76	21.03	62.56	
Missouri	50	1.39	20.56	2.00	18.06	18.00	21.67	22.00	39.70	58.00	10.19	19.66	25.43	44.72	
Nevada	249	6.94	20.36	1.61	17.91	8.03	21.87	19.68	39.86	70.68	6.80	17.39	24.43	51.39	
Ohio	73	2.03	20.77	0.00	17.71	4.11	21.24	20.55	40.28	75.34	8.96	19.41	25.61	46.02	
Oregon	196	5.46	20.49	2.04	17.90	11.22	21.31	22.96	40.30	63.78	6.07	16.32	25.10	52.51	
Texas	351	9.78	22.78	1.71	16.91	5.70	18.70	17.09	41.61	75.50	5.52	13.27	21.00	60.21	

\* Based on 2014 Peer Mortgage Data -- U.S. and Puerto Rico

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

<sup>6</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11a. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES JANUARY 1, 2012 TO DECEMBER 31, 2015			Geography: SUPPLEMENTAL ASSESSMENT AREAS					Evaluation Period:	
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
California	6,962	74.63	78.79	70.88	86.91	13.03	0.06	801,844	378,059
Missouri	129	1.38	77.27	82.17	93.02	6.20	0.78	89,996	40,281
Nevada	643	6.89	75.35	69.52	89.11	10.73	0.16	51,549	25,300
Ohio	246	2.64	77.20	80.49	96.34	3.66	0.00	156,870	64,659
Oregon	177	1.90	80.09	71.75	91.53	7.34	1.13	82,787	39,432
Texas	1,172	12.56	78.44	68.43	88.74	8.11	3.16	452,031	199,735

\* Based on 2014 Peer Small Business Data -- U.S. and Puerto Rico

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source Dun & Bradstreet - 2015).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS 1, 2012 TO DECEMBER 31, 2015		Geography: SUPPLEMENTAL ASSESSMENT AREAS					Evaluation Period: JANUARY		
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
California	0	0.00	92.63	0.00	0.00	0.00	0.00	6,324	3,048
Missouri	0	0.00	98.36	0.00	0.00	0.00	0.00	8,436	6,301
Nevada	0	0.00	92.98	0.00	0.00	0.00	0.00	341	203
Ohio	0	0.00	98.00	0.00	0.00	0.00	0.00	4,462	2,755
Oregon	0	0.00	95.61	0.00	0.00	0.00	0.00	2,668	1,546
Texas	0	0.00	96.82	0.00	0.00	0.00	0.00	13,891	8,243

\* Based on 2014 Peer Small Business Data -- U.S. and Puerto Rico

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source Dun & Bradstreet - 2015).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 13a. Geographic and Borrower Distribution of Consumer Loans (Institution’s Option)**

Geographic and Borrower Distribution: CONSUMER LOANS																		Geography: SUPPLEMENTAL ASSESSMENT AREAS																		Evaluation Period:			
JANUARY 1, 2012 TO DECEMBER 31, 2015																																							
Assessment Area:	Geographic Distribution										Borrower Distribution																												
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers																						
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds*	% of BANK Loans																					
<b>Full Review:</b>																																							
California	20,917	17.90	6.39	10.82	24.32	41.01	35.64	35.22	33.62	12.93	24.46	61.67	15.96	27.25	17.48	8.04	42.10	3.05																					
Missouri	16,863	14.43	5.24	8.69	18.95	27.14	52.47	55.45	23.32	8.72	23.99	67.53	16.59	24.28	18.47	6.69	40.95	1.51																					
Nevada	3,015	2.58	5.79	9.05	22.71	32.87	44.03	47.53	27.46	10.48	22.18	56.35	17.29	32.57	19.50	8.23	41.03	2.85																					
Ohio	34,945	29.91	7.16	12.73	19.31	31.60	47.25	48.04	26.28	7.62	24.13	64.65	16.11	25.47	18.01	7.80	41.74	2.08																					
Oregon	4,436	3.80	1.72	1.76	19.07	29.19	56.96	60.87	22.25	8.18	23.50	61.45	16.53	30.23	18.54	6.67	41.43	1.65																					
Texas	36,655	31.37	7.15	8.92	23.48	33.88	38.02	43.88	31.35	13.29	24.10	55.33	16.32	29.24	17.44	10.57	42.14	4.85																					

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2010 Census information.

