

**HOME BANK OF CALIFORNIA  
CRA PUBLIC FILE  
2023**

**Public Comments** – HBC has not received any public comments.

**CRA Public Evaluation** – The Bank’s CRA Public Evaluation prepared by the FDIC as of 06/13/2022 is attached.

**List of Existing Branch Offices/Hours of Operation**

4493 Ruffin Road San Diego, CA 92123 858-270-5881	San Diego County Census Tract # 0085.11 Demo Designation: Middle	9:00 am to 5:00 pm Mon. – Friday

**Recently Opened/Closed Offices** – No Offices were opened or closed in 2023

**Products & Services**

*Loan Products* - Please see a member of our lending staff for information concerning typical interest rates, annual percentage rates, and fees.

<i>Residential Mortgage Loans</i>	<i>Commercial &amp; Industrial Loans</i>	<i>Commercial Loans</i>
<ul style="list-style-type: none"> <li>• Purchase</li> <li>• Construction</li> <li>• Refinance</li> <li>• Rental Property</li> <li>• Lot Purchase</li> <li>• Second/Vacation Home</li> </ul>	<ul style="list-style-type: none"> <li>• Term Loans</li> <li>• Lines of Credit</li> </ul>	<ul style="list-style-type: none"> <li>• Small Business (SBA)</li> <li>• Real Estate</li> <li>• Single &amp; Multi Family Non-Own. Occ.</li> <li>• Commercial</li> <li>• Industrial &amp; Mixed Use</li> </ul>

*Deposit Products/Transaction Fees*

Attached are deposit account brochures, which describe the terms and fees of accounts that are offered by the Bank. In addition, the following services are offered:

Checking Accounts (Personal & Business)	Credit Cards (Branded only)
Interest Checking Accounts (Personal & Business)	ATM & Debit Cards
Passbook Savings Accounts	Cashier’s Checks
Super Money Fund Accounts (Personal & Business)	On-Line Banking & Bill Payment
Certificates of Deposit	Wire Transfers
Individual Retirement Accounts	Statement Imaging
Interest on Attorney Client Trust Accounts	Remote Deposit Capture
Domestic & International Wire Transfers	Mobile Banking

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Mobile Banking Sweep services Positive Pay E-ACH E-Wires Payroll Merchant Services (card processing)	ACH
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*Other Services* - ATM service is available at any Money Pass ATM Location. ATM operator or network fees may be imposed. The Bank intends to install an ATM during the 2024 year.

**Assessment Area**

- ☐ The Bank's office is located in the San Diego California. Management and the Board of Directors have determined that the entire San Diego County is the Bank's assessment area.
- ☐ A map identifying the Bank's assessment area and the census tracts within the assessment area are attached.

**Loan-to-Deposit Ratios**

<b>Quarter</b>	<b>Loan-to-Deposit Ratio</b>
3/31/2023	127.37
6/30/2023	120.04
9/30/2023	115.77
12/29/2023	113.22

**HMDA Disclosure Reports** –The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's Web site ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)). HMDA data for many other financial institutions are also available at this Web site.

Special note regarding HMDA data for calendar years 2016 and earlier: Inquire at this office regarding the locations where HMDA data may be inspected. To receive a copy of these data, send a written request to Home Bank of California 4493 Ruffin Road, San Diego, CA 92123.

**Attachments**

- 1 –FDIC CRA Public Evaluation
- 2 - Deposit Account Brochure & Schedule of Service Fees
- 3 - Assessment Area Map & Census Tract Information

# BUSINESS AND PERSONAL SAVINGS

	Statement Savings	Super Money Fund		Certificate of Deposit
Minimum Opening Deposit	\$50	Consumer \$1,000	Business \$2,000	\$2,500
Fee Waiver Options	Minimum daily balance of \$300 or HBC Checking account or HBC Merchant Services or Payroll.	Minimum daily balance of \$1,000.	Minimum daily balance of \$2,000.	Not Applicable
Transaction Fees	Deposited items <ul style="list-style-type: none"> <li>No fee for first 25 items, then 45¢ per item, no charge for deposit ticket.</li> <li>Cash deposit processing</li> <li>No fee for first \$5,000, then 30¢ per \$100</li> </ul>			Not Applicable
Restrictions	6 withdrawals per month. Withdrawals limited to no more than 6 automatic or pre-authorized transfers, telephone transfers or online transfers or payments each monthly statement period	6 withdrawals per month. Withdrawals limited to no more than 6 automatic or pre-authorized transfers, telephone transfers or online transfers or payments each monthly statement period		Penalty for early withdrawal
Service Charge	\$5.00 If minimum balance is not maintained any day during the quarter	\$15.00 If minimum balance is not maintained any day during the monthly		Not Applicable
Interest	Earned on the entire daily balance  Interest is compounded daily and paid quarterly. Limited to no more than 6 automatic or pre-authorized transfers, telephone transfers or online transfers or payments each monthly statement period.	Earned on the entire daily balance  Interest is compounded daily and paid quarterly. Limited to no more than 6 automatic or pre-authorized transfers, telephone transfers or online transfers or payments each monthly statement period.		Various competitive rates and terms available.
	Variable interest rate subject to change	Variable interest rate subject to change		

## BUSINESS CHECKING

Account	Small Business Checking	Business Checking	Better Business Interest Checking	Business Analysis Checking
Activity Level	Low	Moderate	Moderate	High
Minimum Opening Deposit	\$100.00	\$100.00	\$500	\$100
Minimum Daily Balance to Waive Service Charges	\$100.00	\$100.00	\$2,500 daily or \$25,000 average monthly balance or Business Credit Line or Loan * Combined Balance feature, for HBC accounts, is available upon your request.	
Monthly Service Fee	No monthly service charge	No monthly service charge	\$20.00 If minimum balance is not maintained any day during the month or required service not open	\$15
Interest/Earnings	Not Applicable	Not Applicable	Earned on the entire daily balance Compounded Daily and paid monthly Variable interest rate subject to change	Ask your branch banker
Monthly Activity	No fee up to \$2,000 total combined cash deposited, ATM deposited/withdraw and currency orders.	No fee up to \$3,000 total combined cash deposited, ATM deposited/withdraw and currency orders.	No fee up to \$10,000 total combined cash deposited, ATM deposited/withdraw and currency orders	Mirrors Business Checking which is then offset up to earnings on the account.
Service Fees	No fee up to 200 combined paid and deposited items Cash-\$1.50 per \$1,000 over minimum above Per item overage-\$ .40 for each item over minimum	No fee up to 300 combined paid and deposited items Cash-\$1.50 per \$1,000 over minimum above Per item overage-\$ .40 for each item over minimum	No fee up to 100 combined paid and deposited items Cash-\$1.50 per \$1,000 over minimum above Per item overage-\$ .40 for each item over minimum	Charge per item clearing account (checks, deposits and other) -\$ .225 Cash deposit/order-\$1.50 per \$1,000
Includes	Online Banking Bill Pay Debit/ATM card E-Statements	Online Banking Bill Pay Debit/ATM card E-Statements	Online Banking Bill Pay Debit/ATM card E-Statements	Online Banking Bill Pay Debit/ATM card E-Statements

\*waives fee on one business account

Account	IOLTA
Description	An interest-bearing checking account designed specifically for lawyers who maintain funds for clients
Minimum Opening Deposit	\$500
Minimum Daily Balance to Waive Service Charges	\$1,000
Monthly Service Fee	\$10.00 if minimum balance is not maintained any day during the month
Interest/Earnings	Earned on the entire daily balance Compounded Daily and paid monthly Variable interest rate subject to change
Includes	Online Banking Bill Pay E-Statements

# BUSINESS SERVICES

Positive Pay		E-ACH Debit & Credit		Remote Deposit Capture		Sweep	
Provides early fraud detection and prevention through the review of suspicious or unauthorized checks before they are paid		ACH Origination enables electronic funds disbursements such as direct deposit and vendor payments, as well as electronic funds collection such as loan payments, dues and contributions.		Efficient, fast way to deposit an unlimited number of checks each month.		Helps make the daily cash management process more efficient and less time consuming. Actual end of day collected balances are used to determine daily investment/loan transaction amounts, the need to track intra-day transactions and anticipate an end of day excess cash position is minimized.	
Monthly Fee	\$25/ account/mo.	Monthly Fee	\$35	Equipment	Rent, buy or use existing <sup>1</sup>	Deposit to Deposit account	\$25/ mo.
No fee up to 1000 check limit.		One Time Set up	\$100	Monthly Fee	\$20	Loan to Deposit Account	\$25/ mo.
Fee per check after limit	\$.015	Each Item	\$.02	Transaction Fee	See fees listed for Checking account	Deposit to Loan Account	\$25/ mo.

<sup>1</sup>May need to confirm compatibility with software.

Debit Card Fees		Replacement Card fee	\$5.00
		Rush Replacement Card Fee	\$45.00
ATM Transaction Fees		Non-HBC ATM (Money Pass®) ATM Operator/Network Fee	No Charge by HBC No charge if within Money Pass® Network. Banks out of network may assess their usage fee.
Deposited Item Returned or Cashed Item Returned		Item Returned fee -Domestic Item Returned Fee-Foreign	\$12.00 each item \$15.00 each item
Deposited Item Re-cleared		Redeposit fee	\$14.00 each item
Legal Processing Fee			\$125 each occurrence (or rate set by law)
Overdraft		Overdraft item fee	\$35.00 each item
Returned Items		Returned Item Fee	\$20.00 per item
Overdraft Protection		Credit Transfer Fee	\$2.00
Stop Payment		Check Stop Fee	\$25.00 per item
		ACH Stop Fee	\$25.00 per item
Negotiable Item		Cashier Check	\$8
		Money Order	\$5
Check Cashing		Non-Customer	\$8.00
Inactive account status (180 days)		Checking only	\$10/month
Research, Copies, Statements		Account research and/or reconciliation	\$30.00 per hour
		Check Copy	\$2.00 per item-Free online
		Paper Statement	\$5.00 per statement-Free online
		Returned statement fee-undeliverable	\$5.00 per month
Check Printing		Varies by amount, style, design	Ask your banker
Account Closing Fee		Checking or Savings-within 6 months of opening	\$20.00

# PERSONAL CHECKING

Account	Personal Checking	Personal Interest Checking
<b>Description</b>	A checking account designed for customers who are looking for flexible options to avoid the monthly service fee	An interest earning checking account that allows you to earn a variable rate of interest with the ability to waive the monthly fee
<b>Minimum Opening Deposit</b>	\$100	\$500
<b>Minimum Daily Balance to Waive Service Charges</b>	\$100 daily balance or \$5,000 combined average balance in checking, savings or CD accounts	\$1,000 in checking or \$5,000 combined average balance in checking, savings, or CD accounts
<b>Monthly Service Fee</b>	\$8.00 Waived if balances or combined balance meet the requirements. Combined Balance feature, for HBC accounts, is available upon your request.	\$12.00 Waived if balances or combined balance meet the requirements. Combined Balance feature, for HBC accounts, is available upon your request.
<b>Interest</b>	Not Applicable	Earned on daily balances Compounded daily and paid monthly Variable interest rate subject to change
<b>Included</b>	Online Banking E statements Debit/ATM Card	Online Banking E statements Debit/ATM Card

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# **PUBLIC DISCLOSURE**

June 13, 2022

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Home Bank of California  
Certificate Number: 26271

4493 Ruffin Road  
San Diego, California 92123

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Kansas City Regional Office

1100 Walnut Street, Suite 2100  
Kansas City, Missouri 64106

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION RATING

**INSTITUTION'S CRA RATING:** This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Home Bank of California (HBC)'s satisfactory Community Reinvestment Act (CRA) performance under the applicable performance criteria supports the overall rating. The following points summarize the bank's performance.

- The loan-to-deposit (LTD) ratio is more than reasonable given the institution's size, financial condition, and assessment area (AA) credit needs.
- A majority of small business loans are in the institution's AA.
- The geographic distribution of small business loans reflects reasonable dispersion throughout the AA.
- The distribution of small business borrowers reflects reasonable penetration among businesses of different revenue sizes.
- The institution did not receive any Community Reinvestment Act-related complaints since the previous evaluation; therefore, this factor did not affect the overall rating.

## DESCRIPTION OF INSTITUTION

HBC is a state-chartered commercial bank headquartered in San Diego, California. HBC's affiliate institution is Home Bank Palmyra, Missouri. The institution received a Satisfactory rating at its previous FDIC Performance Evaluation dated May 9, 2016, based on Interagency Small Institution Examination Procedures.

HBC continues to be primarily a commercial lender, and operates one full-service branch in San Diego, California, which also encompasses the main headquarters. The branch is located in a middle-income census tract.

HBC offers various loan products primarily focused on business banking. Business loan products include commercial real estate, commercial and industrial, mixed-use loans, and Small Business Administration (SBA) 7a and 504 loans. HBC offers a variety of deposit products for both business and personal customers including statement savings accounts, checking accounts (personal and business), interest checking accounts (personal and business), super money fund accounts, certificate of deposit accounts, individual retirement accounts, interest on lawyer trust accounts, and passbook savings. Alternative banking services include online banking and bill payment, debit/ATM cards, and mobile banking.

Bank assets totaled \$203.6 million according to the March 31, 2022 Reports of Condition and Income (Call Report), including total loans of \$188.7 million, and total deposits of \$157.7 million. The distribution of the loan portfolio by loan type is illustrated in the following table.

Loan Portfolio Distribution as of 03/31/2022		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	8,976	4.8
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	51,040	27.0
Secured by Multifamily (5 or more) Residential Properties	11,590	6.1
Secured by Nonfarm Nonresidential Properties	109,878	58.2
<b>Total Real Estate Loans</b>	<b>181,484</b>	<b>96.2</b>
Commercial and Industrial Loans	7,891	4.2
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	0	0.0
Obligations of State and Political Subdivisions in the U. S.	0	0.0
Other Loans	0	0.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	(686)	(0.4)
<b>Total Loans</b>	<b>188,689</b>	<b>100.0</b>
<i>Source: 03/31/2022 Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that limit the institution's ability to meet AA credit needs.

## DESCRIPTION OF ASSESSMENT AREA

HBC designated the single AA of San Diego County, which is wholly contained within the San Diego-Chula Vista-Carlsbad Metropolitan Statistical Area (MSA).

### Economic and Demographic Data

The following table illustrates select demographic characteristics of the AA.

Table A – Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	628	9.7	22.6	32.5	34.1	1.1
Population by Geography	3,223,096	8.9	23.6	32.5	34.7	0.3
Housing Units by Geography	1,180,806	7.7	21.7	34.2	36.5	0.0
Owner-Occupied Units by Geography	579,079	2.8	15.1	35.5	46.6	0.0
Occupied Rental Units by Geography	515,078	13.1	28.8	32.8	25.2	0.0
Vacant Units by Geography	86,649	7.6	22.8	33.8	35.8	0.0
Businesses by Geography	345,784	5.6	14.7	34.7	44.9	0.1
Farms by Geography	6,598	4.1	17.2	37.6	41.1	0.0
Family Distribution by Income Level	731,328	23.6	16.9	17.8	41.7	0.0
Household Distribution by Income Level	1,094,157	24.8	15.7	17.1	42.4	0.0
Median Family Income MSA - 41740 San Diego-Chula Vista-Carlsbad, CA MSA		\$75,179	Median Housing Value			\$458,248
			Median Gross Rent			\$1,404
			Families Below Poverty Level			10.6%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Examiners obtained the following economic information from Moody's Analytics as of February 2022.

### ***San Diego County***

San Diego-Carlsbad's economy is slowly recovering in relation to the rest of the nation in part to remote work that supports out-migration. In addition, the growing popularity of remote-working arrangements clouds the outlook for many consumer services and commercial real estate. While office-using employment has nearly returned to its pre-pandemic level, downstream industries are struggling more than their national counterparts. For example, employment in leisure/hospitality, retail, and personal services combined is further below its pre-pandemic level than nationally. With many people working from home and business travel resuming slowly, fewer people are going to restaurants, shopping, or staying in hotels. The increased federal funding to the defense industry

has begun to support the MSA, as San Diego is home to Marine Corps Base Camp Pendleton, Coast Guard bases, and some of the more strategically important Naval bases in the Pacific. The San Diego-Carlsbad MSA will be reliant on professional service roles as tech firms are attracted by the highly educated workforce and existing presence of biotech, information technology, and cybersecurity firms. The current unemployment rate at 4.7 percent is above the national average. The economic strengths for the area include dynamic professional services, and strong national investment in the Pacific naval forces and technology. Weaknesses include high cost of living, weak migration trends, and trade and business flows hindered due to border-crossing bottlenecks with Tijuana. The top employers include the University of California (UC) San Diego, 32<sup>nd</sup> St Naval Station, Marine Corps Community Services/Marine Corps Recruit Depot, Kaiser Permanente, and UC San Diego Health.

### **Competition**

The AA is a highly competitive market for financial services. Competing institutions range from small community banks to larger national financial institutions. According to the June 30, 2021 FDIC Deposit Market Share Report, 48 banks operate 520 offices in the AA. The top five institutions in San Diego County account for 56.0 percent of the branches, and 57.9 percent of the deposits. HBC ranks 34<sup>th</sup> with a deposit market share of less than 1 percent.

### **Community Contact**

Examiners conducted one community contact with a local community development organization that serves the San Diego-Chula Vista-Carlsbad MSA. The organization provides economic development assistance to support new and existing businesses in San Diego County. The contact indicated that the Coronavirus Disease 2019 (COVID-19) has had an effect on individuals and businesses in multiple ways. The most visible way is that remote work has become more prevalent in the area, with many people moving to Utah, Nevada, and Arizona for a better cost of living. In addition, the recent Federal Reserve interest rate increases have caused a shift in banking focus related to lending. Furthermore, the number of small businesses seeking lending has reduced because of changes in lending focus, and the increased cost to acquire and maintain a new business loan. There are opportunities for financial institutions to be involved by joining non-profit organizations as Board members. In this role, they can provide education to small businesses, provide additional funding to small businesses, and explain financial service features in relation to evolving business infrastructure.

### **Credit Needs**

Considering information from the community contact, bank management, and demographic and economic data, examiners determined that there is a need for education in relation to financing options and small business loans. Many small businesses rely on their bankers to explain other lending channels that are available to them outside of a business loan. The contact mentioned many bankers are unaware of grant programs available to small businesses, and are unaware of non-profit organizations within the community that can assist customers in finding grant programs. Small businesses represent a significant portion of the area, with 90.1 percent of businesses having gross annual revenues of \$1 million or less, and 92.0 percent having nine or fewer employees. This

indicates there are small business lending opportunities in the area. Small business lending opportunities and demand are high throughout the AA, even as interest rates continue to increase.

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the period from the prior evaluation dated May 9, 2016, to the current evaluation dated June 13, 2022. Examiners used Interagency Small Institution Examination Procedures to evaluate HBC's CRA performance. These procedures focus on the bank's performance under the Lending Test as outlined in the Small Bank Performance Criteria Appendix. Examiners relied on records provided by the institution, public financial and economic information, demographic data, and community contacts.

### **Activities Reviewed**

Examiners determined that HBC's major product line is small business loans based on the bank's business strategy, loan portfolio composition, and the lending activity during the evaluation period. A review of the Call Report as of March 31, 2021, showed that 62.4 percent of the loan composition is attributed to commercial real estate, and commercial and industrial lending. While 27.0 percent of the loan composition is attributed to 1-4 family residential lending, this was primarily due to real estate being used as collateral for business purpose lending. Therefore, examiners did not analyze or present home mortgage loans. Additionally, HBC does not offer consumer or small farm loans.

Examiners analyzed the universe of small business loans originated or purchased from January 1, 2017, to December 31, 2021. During the evaluation period, HBC originated 363 small business loans totaling \$260.6 million between 2017 and 2021. Examiners analyzed and presented 2021 lending data, because the bank's asset size and lending focus was generally consistent since the previous evaluation. HBC experienced relatively flat trends throughout the evaluation period due to a lack of SBA Paycheck Protection Program (PPP) lending. Specifically, HBC facilitated the origination of PPP loans by processing and funding the loans through its affiliate, Home Bank in Palmyra, Missouri.

For the Lending Test, examiners reviewed the entire universe of loans to evaluate the Assessment Area Concentration criterion. All loans inside of the AA were further reviewed to evaluate the Geographic Distribution and Borrower Profile criteria. The 2021 D&B data provided a standard of comparison for the bank's small business lending performance. While both number and dollar volume of loans are presented, examiners emphasized performance by number of loans since it is a better indicator of the number of businesses served.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

HBC demonstrated reasonable performance under the Lending Test. The bank's Assessment Area Concentration, Geographic Distribution, and Borrower Profile performance supports this conclusion.

#### Loan-to-Deposit Ratio

HBC's LTD ratio is more than reasonable given the institution's size, financial condition, and AA credit needs. The LTD ratio averaged 121.0 percent over the past 24 calendar quarters from June 30, 2016, to March 31, 2022. The ratio ranged from a low of 106.4 percent as of September 30, 2018, to a high of 132.5 percent as of March 31, 2019. The LTD ratio fluctuated during the evaluation period, but remained above 100.00 percent throughout the evaluation period. As shown in the following table, HBC's LTD ratio was higher than one similarly situated institution. Examiners selected this institution based on the institution's asset size, geographic location, and lending focus.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 03/31/2022 (\$000s)	Average Net Loan-to Deposit Ratio (%)
Home Bank of California	203,570	121.0
Similarly-Situated Institution #1	170,368	48.2
<i>Source: Reports of Condition and Income 06/30/2016 – 03/31/2022</i>		

#### Assessment Area Concentration

HBC originated a majority of small business loans, by number, within its AA. A majority of lending by dollar volume was conducted outside of the AA due to larger dollar loans. The bank's performance indicates adequate responsiveness to the AA credit needs. The following table shows the distribution of the bank's small business lending inside and outside of its AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total  #	Dollar Amount of Loans \$(000s)				Total  \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	27	52.9	24	47.1	51	7,148	43.8	9,188	56.2	16,336
Total	27	52.9	24	47.1	51	7,148	43.8	9,188	56.2	16,336
Source: Bank Data Due to rounding, totals may not equal 100.0%										

### Geographic Distribution

HBC's geographic distribution of small business loans reflects reasonable dispersion throughout the AA. Examiners focused on the percentage of small business lending in low- and moderate-income census tracts. The bank's lending performance in both low- and moderate-income census tracts was above corresponding demographic data. The following table illustrates the bank's demographic distribution of small business loans by census tract income level.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	5.6	2	7.4	598	8.4
Moderate	14.7	6	22.2	1,919	26.8
Middle	34.7	10	37.0	2,165	30.3
Upper	44.9	9	33.3	2,466	34.5
Not Available	0.1	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>7,148</b>	<b>100.0</b>
<i>Source: 2021 D&amp;B Data, Bank Data Due to rounding, totals may not equal 100.0%</i>					

### Borrower Profile

HBC's distribution of small business loans reflects reasonable penetration among businesses of different revenue sizes. Examiners focused on lending to businesses with revenues of \$1 million or less. Although the bank's lending performance was below corresponding D&B demographic data, it is noted that not all businesses captured in D&B data may have credit needs or be creditworthy. Additionally, some small businesses may have received PPP loans for their lending needs. HBC facilitated the origination of PPP loans by forwarding the applications to its affiliate. The following table shows the borrower distribution of small business loans by revenue level.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	90.1	20	74.1	6,580	92.1
>\$1,000,000	3.7	7	25.9	568	7.9
Revenue Not Available	6.3	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>7,158</b>	<b>100.0</b>
<i>Source: 2021 D&amp;B Data, Bank Data Due to rounding, totals may not equal 100.0%</i>					

### Response to Complaints

The institution has not received any CRA-related complaints since the prior evaluation; therefore, this criterion did not affect the rating.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, and examiners did not identify any discriminatory or other illegal credit practices.

## **APPENDICES**

### **SMALL BANK PERFORMANCE CRITERIA**

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

## GLOSSARY

**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/assessment area.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**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.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, 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 metropolitan area/assessment area.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

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

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area (also known as non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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.

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

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Loan:** 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 are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.