

# Community Reinvestment Act Public File

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# **COMMUNITY REINVESTMENT ACT NOTICE**



Under the federal Community Reinvestment Act (CRA), the Federal Deposit Insurance Corporation (FDIC) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The FDIC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the FDIC; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Regional Director, FDIC, 25 Jessie Street at Ecker Square, Suite 2300, San Francisco, CA 94105. You may send written comments about our performance in helping to meet community credit needs to Stacey Craghead, Vice President, Community Commerce Bank, 358 Foothill Blvd., Claremont, CA 91711 and FDIC Regional Director. You may also submit comments electronically through the FDIC's Web site at <a href="https://www.fdic.gov/regulations/cra">www.fdic.gov/regulations/cra</a>. Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC.

# **WRITTEN COMMENTS**

This section contains all written comments received from the public for the current year and each of the prior two calendar years that specifically relate to the Bank's performance in helping to meet community credit needs, and any response to the comments by the Bank, if neither the comments nor the responses contain statements that reflect adversely on the good name or reputation of any persons other than the Bank or publication of which would violate specific provisions of law.

2024: NO WRITTEN COMMENTS (to date)

2023: NO WRITTEN COMMENTS

2022: NO WRITTEN COMMENTS

# **III** CRA PERFORMANCE EVALUATION

This section contains a copy of the public section of the bank's most recent CRA Performance Evaluation prepared by the FDIC as of November 23, 2020.

Community Commerce Bank Certificate Number: 26363

358 West Foothill Boulevard Claremont, California 91711

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
San Francisco Regional Office
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, California 94105

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.

### **INSTITUTION RATING**

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

An institution in this group has an outstanding 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.

#### The Lending Test is rated **Outstanding**.

- The loan-to-deposit ratio (LTD) 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 AA.
- The geographic distribution of loans reflect excellent dispersion throughout the AA.
- The distribution of borrowers reflect excellent penetration among businesses of different sizes.
- Community Commerce Bank (CCB) did not receive any CRA-related complaints since the prior evaluation; therefore, this factor did not affect the lending test rating.

#### **DESCRIPTION OF INSTITUTION**

CCB is a minority industrial loan company headquartered in Claremont, California. CCB is 98 percent owned by The East Los Angeles Community Union (TELACU), Industries Incorporated, a wholly owned profit-oriented subsidiary of TELACU, a California private non-profit corporation. TELACU primarily serves low-income communities in Southern California and is one of the largest community development corporations in the United States. It has been in operation for over 50 years.

CCB was founded for the express purpose of serving the credit needs of the local community. In addition to the administrative office, which is located in an upper-income census tract (CT), CCB operates three full-service branch offices in Southern California. Branches located in Claremont and Tarzana are situated in upper-income CTS, and the Monterey Park branch is located in a middle income CT. Since the prior evaluation,

CCB closed the Woodland Hills branch and opened the Tarzana branch in December 2016. No merger or acquisition activities occurred since the previous evaluation. CCB received a "Satisfactory" rating at its previous FDIC Performance Evaluation based on the Interagency Small Institution Examination Procedures.

CCB provides statement savings accounts and time deposit accounts. The bank specializes in construction loans, commercial real estate loans, loans to non-profits and religious organizations, and other real estate lending for both consumer (commercial properties) and business purposes. CCB has been an approved Small Business Administration (SBA) 7(a) lender since 2015. CCB operates a website that allows borrowers to initiate an ACH payment for their loan payment.

CCB's assets totaled approximately \$338.4 million as of September 30, 2020, and included total loans of \$254.1 million and total securities of \$142.0 million. The bank reported deposits of \$203.5 million. The distribution of the loan portfolio by loan type is illustrated in the following table.

Loan Portfolio Distribution as of 09/30/2020						
Loan Category	\$(000s)	%				
Construction, Land Development, and Other Land Loans		0.0				
Secured by Farmland		0.0				
Secured by 14 Family Residential Properties	20,808	8.2				
Secured by Multifamily (5 or more) Residential Properties	29,936	11.8				
Secured by Nonfarm Nonresidential Properties	133,655	52.6				
Total Real Estate Loans	184,399	72.6				
Commercial and Industrial Loans	33,612	13.2				
Agricultural Production and Other Loans to Farmers		0.0				
Consumer Loans	36,125	14.2				
Obligations of State and Political Subdivisions in the U.S.		0.0				
Other Loans		0.0				
Lease Financing Receivable (net of unearned income)		0.0				
Less: Unearned Income		0.0				
Total Loans	254,136	100.0				

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

#### **DESCRIPTION OF ASSESSMENT AREA**

CCB's AA is comprised of the contiguous area consisting of Los Angeles, Orange, Riverside, and San Bernardino Counties. These four counties are contained in the Los Angeles-Long Beach, California combined statistical area (CSA) #346. The CSA includes the following metropolitan divisions ODs) or metropolitan statistical areas (MSAs): 1) Los Angeles-Long Beach-Glendale, CA #31084 (Los Angeles County); 2) Riverside-San Bernardino-Ontario, CA MSA #40140 (San Bernardino and Riverside Counties); and 3) Anaheim-Santa Ana-Irvine, CA MD #11244 (Orange County).

The AA complies with all of the technical requirements of the CRA regulation by containing whole geographies, does not reflect illegal discrimination, and does not arbitrarily exclude any low- and moderate-income (LMI) areas. The AA is densely populated and economically and demographically diverse. Management selected these geographies based on the location of the bank's offices and the expectation of attracting and retaining a consumer base within these geographies.

#### **Economic and Demographic Data**

#### Los Angeles County

Based on Moody's Analytics published as of August 2020, the Los Angeles County economy is recovering from a recession after the devastating effects of the COVID-19 pandemic on the area and labor market. The unemployment rate was among the highest in the county at 17.5 percent as of July 2020. State and locally mandated lockdowns have crippled nonessential businesses, with the leisure/hospitality industry experiencing the greatest job losses. The seaports of Los Angeles and Long Beach are vital economic drivers that were already negatively impacted by the trade war going into the pandemic. Year-to-date cargo volumes rose slightly in July but were down compared to 2019. The July increase was driven by imports; exports remained especially weak. The main economic drivers for the Los Angeles area include the tourism, logistics, and medical industries. Economic strengths include a strong healthcare base and a growing technology presence; global links through entertainment, tourism, and fashion; and the advantage of the San Pedro Harbor to handle megaships that other ports cannot. Economic weaknesses include high costs that hinder net migration gains and that the area is prone to natural disasters, including drought, wildfires, and earthquakes. The top employers include the Cedars-Sinai Medical Center, Los Angeles International Airport, University of California, Los Angeles, VXI Global Solutions, and the Walt Disney Company.

#### **Orange County**

Based on Moody's Analytics published as of August 2020, the Orange County economy is also recovering from a recession after the devastating effects of the COVID-19 pandemic on the area and labor market. Payroll employment plummeted 16.5 percent at the peak of the pandemic in April; no industry was untouched, but leisure/hospitality was hardest hit with a 46 percent drop. While the unemployment rate is falling slowly at 13.5 percent as of June 2020, the labor force is still far below its pre-pandemic levels and only about onequarter of the jobs lost in March and April have been recouped. As one of the area's leading employers, the closure of Disneyland for the past seven months has left thousands of employees furloughed. The move to virtual learning and the 13 percent reduction in funding by the Governor has lead the area's second largest employer, the University of California- Irvine, to consider salary cuts, furloughs or layoffs to reduce spending. Passenger counts at John Wayne Airport were down 75 percent from a year earlier in July. Hotel occupancy rates are also deeply depressed and caution by travelers will weigh on airlines and hotels even as the economy rebounds. The main economic drivers for Orange County include the tourism, technology, and medical industries. Economic strengths include a highly trained and well-educated workforce, research and development clusters underpin the demand for offce space, and the coastline and climate attract residents and visitors. Economic weaknesses include theme parks closed through the end of the year, and tourists being more hesitant to travel. The top employers include the Disney Resorts, University of California, Irvine, St Joseph Health, Kaiser Permanente, and Target Brands Inc.

#### Riverside-San Bernardino Counties

Based on Moody's Analytics published as of August 2020, the Riverside-San Bernardino Counties economy is slowly recovering from a recession after the devastating effects of the COVID-19 pandemic on the area and labor market. The decimated leisure/hospitality industry has been the main drag on job growth. The unemployment rate has come down very little in recent months. Logistics will keep the recovery moving. Among the 65 metro areas or divisions with at least 1 million residents, Riverside-San Bernardino boasts the second-highest share of jobs in transportation and warehousing. Proximity to Southern California's biggest cities and cheaper land costs make Riverside-San Bernardino an ideal distribution point for major retailers. The pandemic's severity was minimized because Target, Walmart, and Amazon were classified as essential employers during the start of the COVID-19 shutdowns, allowing their Riverside-San Bernardino warehouses to remain open. The outlook for logistics is bright given the importance of e-commerce in helping consumers weather the pandemic. Economic strengths of the area include comparative advantage in transportation, distribution, and warehousing; lower business and housing costs than in nearby coastal areas; and a young population with a positive net migration. Economic weaknesses include lack of a

central core downtown, low per capita income and poorly educated workforce, and lack of knowledge-based industries. The top employers include the Stater Brothers, Arrowhead Regional Medical Center, U.S. Marine Corps Air Ground Combat Center, Fort Irwin, Walmart, and University of California, Riverside.

#### **Demographics**

Based on 2015 American Community Survey (ACS) data, the AA consists of 3,751 CTS, of which 309 are low-income, 1,067 are moderate-income, 1,061 are middle-income, 1,254 are upper income, and 60 do not have an income designation. The following table illustrates demographic information within the AA.

Demogr	aphic Informat	ion of the	Assessment A	rea		
Demographic Characteristics	#	<b>Low</b> % of #	Moderate % of #	Middle % of #	Upper % of #	<b>NA*</b> % of #
Geographies (Census Tracts)	3,751	8.2	28.5	28.3	33.4	1.6
Population by Geography	17,547,258	7.8	28.6	29.0	34.0	0.5
Housing Units by Geography		6.9	26.2	28.7	37.9	0.3
Owner-Occupied Units by Geography		2.6	18.5	30.3	48.5	0.1
Occupied Rental Units by Geography		11.5	34.5	26.7	26.7	0.6
Vacant Units by Geography	476,665	6.5	25.9	31.2	35.8	0.7
Businesses by Geography		4.7	20.0	26.6	47.2	1.6
Farms by Geography	18,013	3.6	20.3	30.6	44.8	0.7
Family Distribution by Income Level	3,892,727	24.0	16.4	17.5	42.1	0.0
Household Distribution by Income Level	5,585,979	25.4	15.6	16.4	42.7	0.0
Median Family Income – MSA 31084 Los Angeles-Long Beach-Glendale, CA		\$62,703	Median Housing Value			\$448,193
Median Family Income – MSA 40140 Riverside-San Bernardino-Ontario, CA		\$61,507	Median Gross Rent			\$1,322
Median Family Income – MSA 11244 Anaheim-Santa Ana-Irvine, CA		\$86,003	Families Below Poverty Level		13.4%	

According to 2019 D&B data, there are 1,470,537 businesses in the AA, of which 85.8 percent have gross annual revenues (GARs) of \$1.0 million or less, 7.8 percent have GARs above \$1.0 million, and 6.4 percent have unknown revenues. The services industry represents the largest portion of businesses at 39.0 percent, followed by non-classifiable industries at 21.8 percent, and retail trade at 11.6 percent. Additionally, 62.0 percent of area businesses have 4 or fewer employees and 92.5 percent of area businesses operate from a single location.

#### Competition

CCB operates in a highly competitive market that includes a number of large national and regional financial institutions within the AA. According to the June 30, 2020 Deposit Market Share Report, 123 financial institutions operated 2,847 branches inside the AA. Of these institutions, CCB ranked 92nd with less than one percent of the deposit market share. The top five institutions in the AA control approximately 59.3 percent of the deposit market share and approximately 54.4 percent of the branches.

CCB is not required to report small business lending data and has not elected to do so. Although reported data is an indicator of competition and demand for small business loans in the AA, data for 2019 small business lending is not available as of the evaluation date.

#### **Community Contact**

As part of the evaluation process, examiners contact third parties to assist in identifying the credit needs of the AA. Examiners conducted a community contact interview with a small business development organization that provides SBA 504 loans and access to working capital for clients not typically eligible for bank financing. The contact identified that small business loans remain a primary credit need for both existing and new businesses during the COVID-19 pandemic. The contact stated that financing requests for restaurants, start-up businesses, online retail, and healthcare services have increased. The contact indicated that opportunities exist for financial institutions to provide start-up loans, micro-loans, and other short-term small business credit assistance within the AA. In addition to new lending, relief for current loans and flexibility on the payment side were also identified as a significant need.

#### **Credit Needs**

Examiners determined that small business loans represent a primary credit need in the AA.

Information gathered from community contacts, bank management, and demographic and economic data support this conclusion. The AA consists of a large percentage of small businesses and there is a considerable need for micro-loans. Opportunities for small business lending and other credit-related projects are present throughout the AA.

#### SCOPE OF EVALUATION

#### General Information

This evaluation covers the period from the prior evaluation dated January 11, 2016, to the current evaluation dated November 23, 2020. Examiners used the Interagency Small Institution Examination Procedures to evaluate CCB's CRA performance. This Evaluation does not include any affiliate lending activity.

The Lending Test considered the institution's performance according to the following criteria: loan-to-deposit ratio, AA concentration, geographic distribution, borrower profile, and response to CRA-related complaints.

#### **Activities Reviewed**

Examiners determined that the CCB's major product line is small business loans. This conclusion considered the bank's business strategy and the number and dollar volume of loans originated and purchased during the evaluation period.

According to the September 30, 2020 Consolidated Report of Condition and Income (Call Report), commercial real estate and commercial/industrial loans represent 65.8 percent of the bank's loan portfolio and consumer loans and multi-family loans represent 14.2 percent and 11.8 percent, respectively. CCB's consumer loans are comprised entirely of purchased auto loan contracts secured by vintage vehicles. Consumer loans will not be included in this CRA review, as specialty car lending is not a major business line of the bank. Although multi-family loans represent 11.8 percent of the loan portfolio, they will not be included in the review due to the nominal volume by both number and dollar amount relative to small business lending. The bank did not originate any farm loans or consumer loans during the review period.

Bank records indicate that the lending focus and product mix remained consistent throughout the evaluation period. Examiners reviewed and analyzed the universe of small business loans originated in the period of January 1, 2018, through December 31, 2019. The bank originated 42 small business loans in 2018 totaling \$17.3 million, and 30 small business loans in 2019 totaling \$12.8 million. This represents an increase from the lending levels at the prior evaluation when the bank originated 23 small business loans totaling \$10.3 million for the years 2014 through 2015.

Examiners did not identify any small business lending trends between 2018 and 2019 that would materially affect overall conclusions; therefore, this evaluation only presents information regarding CCB's 2019 small business lending performance for geographic distribution and borrower profile.

Examiners analyzed both the number and dollar volume of loans originated. While number and dollar volume of loans are presented, examiners emphasized performance by number of loans as this is generally a better indicator of the number of businesses sewed. Additionally, the percentage by dollar volume is generally consistent with the percentage by number of loans.

Examiners relied on CCB's financial records, Reports of Condition and Income, demographic data from the 2015 ACS Census data, 2019 D&B Data, the institution's small business loan data, regulatory data from the FDIC, and information gathered from community contacts.

### **CONCLUSIONS ON PERFORMANCE CRITERIA**

#### **Lending Test**

CCB's Lending Test is rated Outstanding. Performance under the Loan-to-Deposit Ratio, AA Concentration, Geographic Distribution, and Borrower Profile criteria support this conclusion.

#### Loan-to-Deposit Ratio

CCB's average net LTD ratio is more than reasonable given the institution's asset size, financial condition, competition, and AA credit needs. The institution's net LTD ratio averaged 120.0 percent over the prior 19 calendar quarters from March 31, 2016 through September 30, 2020. The ratio ranged from a low of 107.9 percent as of June 30, 2019, to a high of 128.4 percent as of March 31, 2016, and has generally remained stable throughout the evaluation period. CCB's average LTD ratio is above that of the identified similarly situated intuition by 32.2 percent.

Loa	an-to-Deposit (LTD) Ratio Comparison	
Bank	Total Assets as of 09/30/2020 (\$000s)	Average Net LTD Ratio
Community Commerce Bank	\$338,351	120.0
Similarly – Situated Institution #1	\$358,668	87.8
Source: Reports of Condition and Income 3/31/2016 - 9/30/2020		

#### Assessment Area Concentration

CCB originated a majority of small business loans within its AA by both number and dollar volume. The following table shows that the bank originated 76.4 percent by number and 76.3 percent by dollar volume of small business loans inside its AA during the evaluation period.

	Lending	Inside ar	nd Outsi	de of the	Assess	ment Area	1			
Loan Category		Number Of Loans				Dollar Amount of Loans \$(000s)				Total \$
	Ins	side	Out	tside Total		Inside		Outside		(000s)
Small Business										
2018	34	81.0	8	19.0	42	14,415	83.4	2,867	16.6	17,282
2019	21	70.0	9	30.0	30	8,516	66.8	4,238	33.2	12,754
Subtotal	55	76.4	17	23.6	72	22,931	76.3	7,105	23.7	30,036
Total	55	76.4	17	23.6	72	22,931	76.3	7,105	23.7	30,036
Source: Bank Data. Due to rounding totals	may not equal 100.0%									

#### Geographic Distribution

The geographic distribution of loans reflects excellent dispersion throughout the bank's AA. The following table illustrates the bank's geographic distribution of small business loans by CT income level.

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Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2019	4.7	3	14.3	907	10.7
Moderate					
2019	20.0	11	52.4	3,967	46.6
Middle					
2019	26.6	3	14.3	1,578	18.5
Upper					
2019	47.2	3	14.3	1,404	16.5
Not Available					
2019	1.6	1	4.8	660	7.8
Totals					
2019	100.0	21	100.0	8,516	100.0

In 2019, CCB originated three small business loans in low-income CTS. CCB's lending in low-income CTS at 14.3 percent is 9.6 percentage points greater than the percent of businesses in the in 2019, CCB originated 11 small business loans in moderate-income CTS. CCB's lending in moderate-income CTS at 52.4 percent is significantly greater than businesses in the AA by 32.4 percentage points.

The bank's level of small business lending showed a slight decrease by number volume from 2018 to 2019 but lending in moderate-income CTS increased by 8.3 percentage points in 2019.

While not used as a direct benchmark for small bank lending performance, aggregate lending data is a good tool to gauge small business loan demand in the AA. In 2018, CCB exceeded the aggregate performance of 4.4 percent in low-income CTS with lending at 23.5 percent. Similarly, the bank's 2018 small business lending in moderate-income CTS at 44.1 percent exceeded the aggregate performance by 23.6 percentage points. Aggregate data for 2019 small business lending was not available as of the evaluation date.

CCB's level of small business lending, particularly in moderate-income CTS reflects favorably on AA lending performance. Overall, this demonstrates excellent dispersion throughout the AA and is an improvement from the prior evaluation's rating of reasonable.

#### **Borrower Profile**

The distribution of borrowers reflects, given the demographics of the AA, excellent penetration among businesses of different revenue sizes. CCBs small business lending performance is compared to businesses with GARs of less than or equal to \$1 million as reported in 2019 D&B data.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%	
<= \$1,000,000						
2019	88.6	21	100.0	8,516	100.0	
>\$1,000,000						
2019	4.8	0	0.0	0	0.0	
Revenue Not Available						
2019	6.5	0	0.0	0	0.0	
Totals						
2019	100.0	21	100.0	8,516	100.0	

In 2019, all of CCB's small business loans were to small businesses with GARs of \$1 million or less, which is more than the percentage of small businesses within the AA as reported by D&B at 88.6 percent.

Although the number of originations decreased from 33 loans to 21 loans between 2018 and 2019, both the number volume and dollar volume of lending to businesses with GARs of \$1 million or less increased, by 2.9 percentage points and 1.7 percentage points respectively.

While not used as a direct benchmark for small bank lending performance, aggregate lending data is a good tool to gauge small business loan demand in the AA. In 2018, aggregate lending data showed that 47.0 percent of small business loans were to businesses with GARs of \$1 million or less in the AA by institutions required to report such data. CCB's 2018 small business lending performance of 97.1 percent by number volume and 98.3 percent by dollar volume is significantly above aggregate data. Aggregate data for 2019 was not available as of the date of this evaluation; however, the trend analysis of CCBs performance is favorable.

#### Response to Complaints

The institution has not received any CRA-related complaints since the previous 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, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA Rating.

#### **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 TERMS**

**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 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.

# IV CORPORATE HEADQUARTERS & LIST OF BRANCHES

This section contains a list of the Bank's branches, their street addresses, and geographies.

#### **Corporate Headquarters**

Address: 358 W. Foothill Blvd., Claremont, CA 91711

MSA/MD Code: 31084 (Los Angeles-Long Beach-Glendale, CA)

Census Tract: 4019.02 Tract Income Level: Upper

#### **Claremont Branch**

Address: 390 W. Foothill Blvd., Claremont, CA 91711

MSA/MD Code: 31084 (Los Angeles-Long Beach-Glendale, CA)

Census Tract: 4019.02 Tract Income Level: Upper

#### **Tarzana Branch**

Address: 19538 Ventura Blvd., Tarzana, CA 91356

MSA/MD Code: 31084 (Los Angeles-Long Beach-Glendale, CA)

Census Tract: 1394.02 Tract Income Level: Upper

#### **Monterey Park Branch**

Address: 2325 S. Atlantic Blvd., Monterey Park, CA 91754 MSA/MD Code: 31084 (Los Angeles-Long Beach-Glendale, CA)

Census Tract: 4827.01 Tract Income Level: Middle

This section contains a list of the Bank's branches, their street addresses, and geographies.

#### V LIST OF BRANCHES OPENED OR CLOSED

This section contains a list of branches opened or closed by the Bank during the current year and each of the prior two calendar years, their street addresses, and geographies.

#### **Branches Closed**

#### Monterey Park Branch, California State

Address: 2323 S. Atlantic Blvd., Monterey Park, CA 91754 MSA/MD Code: 31084 (Los Angeles-Long Beach-Glendale, CA)

Census Tract: 4827.01 Tract Income Level: Middle Closed: January 2023

#### **Branches Opened**

#### Monterey Park Branch, California State

Address: 2325 S. Atlantic Blvd., Monterey Park, CA 91754 MSA/MD Code: 31084 (Los Angeles-Long Beach-Glendale, CA)

Census Tract: 4827.01 Tract Income Level: Middle Opened: February 2023

# VI LIST OF SERVICES, PRODUCTS & FEES

This section contains a list of services (including hours of operation, available loan and deposit products, and transaction fees) generally offered at the Bank's branches and descriptions of material differences in the availability or cost of services at particular branches, if any.

#### **Branch Hours of Operation**

#### **Claremont Branch**

Address: 390 W. Foothill Blvd., Claremont, CA 91711

Telephone: (909) 625 - 7891

Hours: 9:00 am - 5:00 pm (Monday - Friday)

#### **Monterey Park Branch**

Address: 2325 S. Atlantic Blvd., Monterey Park, CA 91754

Telephone: (323) 268 - 6100

Hours: 9:00 am - 5:00 pm (Monday - Friday)

#### Tarzana Branch

Address: 19538 Ventura Blvd., Tarzana, CA 91356

Telephone: (818) 992 - 5661

Hours: 9:00 am - 5:00 pm (Monday - Friday)

#### Loan Products Available

#### **Commercial Property Loans**

Real estate financing solutions to meet your purchase, refinance, or equity loan needs for office, retail, manufacturing, automotive, and other commercial structures.

#### Single Family Residence (1-4 units) Loans

Supporting non-owner occupied SFR, condos, townhomes, duplexes, triplexes, quadplexes, or owner occupied not subjected to RESPA. LLCs and Corporations OK.

#### Apartment / Multi-Family (5+ units) Loans

Lending against a wide variety of multi-unit residential or apartment buildings with 5 or more units for purchase, refinance or cash-out options.

#### **Mixed Use Property Loans**

Any combination of spaces intentionally used for retail/office and residential on the same property will qualify.

#### **House Of Worship Loans**

Specialized lending programs are available for places of worship, single-use buildings for congregation or local gathering of religious believers.

#### SBA 7(a) Program Loans

Financing for small businesses that operate for profit in the U.S. for purchase or refinance of real estate, business acquisition, equipment purchase, inventory purchase, or working capital.

#### Savings Products Available

#### **Savings Accounts**

- Interest begins to accrue on the date of deposit but does not include the date of withdrawal.
   Interest is compounded daily and credited to the account monthly. If you close your account before interest is credited, you will receive the accrued interest. The daily balance method is used to calculate the interest on your account. This method applies a periodic rate to the principal in the account each day based on a 365-day year.
- Interest rate on variable rate savings accounts is subject to change by Community Commerce Bank at its sole discretion, without notice.
- Deposits and Withdrawals may be made on savings accounts.
- Minimum Balance requirement of \$50.00 on all savings accounts. Accounts will be closed if balance falls below \$50.00.

#### **Time Deposits Accounts**

- Interest begins to accrue on the date of deposit but does not include the date of withdrawal.
   Interest is compounded monthly and credited to the account monthly. The daily balance method is used to calculate the interest on your account. This method applies a periodic rate to the principal in the account each day based on a 365-day year. The annual percentage yield (APY) assumes the interest remains on the deposit until maturity. Interest withdrawals are permitted only during the five (5) day grace period. A withdrawal of interest will reduce the earnings.
- After the account is opened, deposits and withdrawals will be permitted during the 5-day grace
  period only (see "Grace Period" below). Withdrawals made other than during the grace period must
  be for the entire account balance and, if made prior to maturity, are subject to the following penalty:
  - Original Term one year or less: All interest from date opened or last maturity date to the withdrawal date.
  - Original Term more than one year: Half of the interest that would have been earned had the account gone to maturity.
- The penalty may reduce the principal sum of the account. Any Interest previously paid in excess
  of this amount will be deducted from the principal sum of the account. Any Interest previously
  paid in excess of this amount will be deducted from the principal sum of the account.
- Time deposits automatically renew at maturity for a like term at the then prevailing rate, unless you close the account. If it renews, you will have five (5) calendar days from the maturity date to withdraw your funds without incurring a penalty. If withdrawn after the grace period, a penalty will be charged. Interest is not paid on funds withdrawn during the grace period.

#### **General Terms and Conditions**

#### **Deposit and Holds**

- As we must submit all items deposited to your account for collection, there may be times items
  cannot be accepted for deposit where endorsements or other circumstances are questionable.
  In receiving items for deposit Community Commerce Bank acts only as collecting agent and
  assumes no responsibility beyond the exercise of due care.
- Checks or similar instruments accepted for deposit to your account will be subject to the following hold periods:
  - Check Hold 7 business days
- Although a hold is placed, you receive credit for, and earn interest on, the deposit from the date made. However, you may not withdraw the funds until the hold period expires.

#### **Fees**

- · Return of Deposited Items \$25.00
- Canceled Check Copy \$5.00
- Stop Payments Order \$35.00

#### Withdrawals

• We reserve the right to ascertain the right or entitlement of any person to withdraw funds from an account. Cash withdrawals are generally limited to small amounts. Withdrawals by check will be payable to the account holder(s) ONLY. On accounts vested to two or more persons payment to any vested owner or their legal representative shall have the same effect as if there were only one vested owner. We reserve the right to require thirty-(30) days notice, in writing for any withdrawal. If funds are mailed, any funds lost in the mail will be subject to a waiting period prior to replacement.

#### **Escheat of Accounts**

Savings accounts and matured time deposits which for a period of three (3) years or more have
not had the balance increased or decreased, have not written us concerning your account, or
in some other verifiable manner corresponded with us regarding your account are considered
to be legally dormant and must be turned over to the state. We will mail you a notice before the
account is sent to the State. However, once escheat of your account occurs, the funds must be
obtained from the State of California.

# VII LIST OF ALTERNATIVE SERVICES

This section contains a list of alternative systems for delivering retail banking services.

#### Alternative Services Available

#### **Online and Mobile Banking**

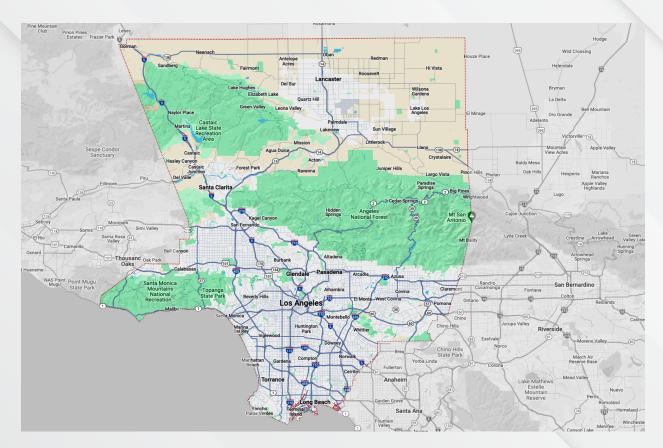
## MAP OF ASSESSMENT AREAS

This section contains a map of each assessment area showing the boundaries of the area and identifying the geographies contained within the area, either on the map or in a separate list.

#### Bank's Assessment Areas

MSA 31080 (Los Angeles-Long Beach-Anaheim, CA Metropolitan Statistical Area)

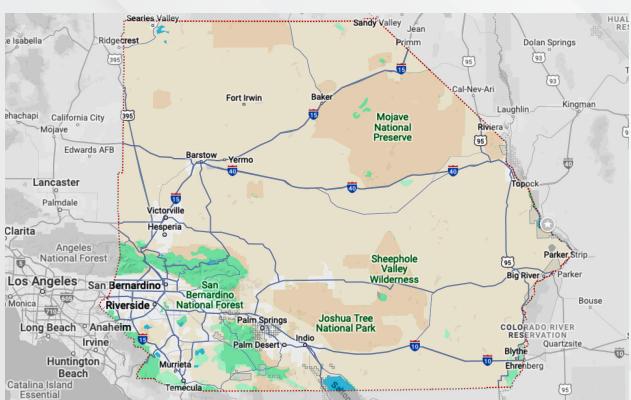
**MD 31084** (Los Angeles-Long Beach-Glendale, CA Metropolitan Division) *Los Angeles County, CA.* 



MD 11244 (Anaheim-Santa Ana-Irvine, CA Metropolitan Division). *Orange County, CA.* 



MSA 40140 (Riverside-San Bernardino-Ontario, CA Metropolitan Statistical Area)



# **IX** NET LOAN-TO-DEPOSIT RATIO

This section contains the Bank's net loan-to-deposit ratio for each quarter of the prior three calendar years.

Net Loan-to-Deposit Ratio							
Quarter End Date	Net Loans <sup>1</sup>	Total Deposits <sup>2</sup>	Net Loan-to-Deposit Ratio	Peer Group Ratio			
3/31/2024	\$287,704	\$289,953	99.22%	77.83%			
6/30/2024	\$289,509	\$299,586	96.64%	79.08%			
9/30/2024	\$291,453	\$301,667	96.61%	78.33%			
12/30/2024	\$293,588	\$307,194	95.57%	78.35%			
3/31/2025	\$289,120	\$302,399	95.60%	77.44%			

Figures are from the Community Commerce Bank's Report on Condition and Income (Call Report) that is filed quarterly in accordance with guidelines set forth by the Federal Financial Institution Examination Council (FFIEC). Call Reports are available to the public through the FFIEC website (<a href="https://cdr.ffiec.gov/public/">https://cdr.ffiec.gov/public/</a>).

- 1. Net loan figures are denoted in Call Report Schedule RC (Balance Sheet) under Items 4.a. (Loans and leases held for sale) and 4.d. (Loans and leases held for investment, net of allowance).
- 2. Total deposit figures are denoted in Call Report Schedule RC (Balance Sheet) under Item 13.a. (Deposits in domestic offices).
- 3. The Bank's key ratios along with peer group comparisons are denoted in the FFIEC Uniform Bank Performance Report (UPBR). The quarterly report is available to the public through the FFIEC website listed above.

# **X** OTHER INFORMATION

This section contains any other information the Bank deems pertinent to its CRA Public File.

No Other Information At This Time



