



Community Reinvestment Act Public File

**Last updated: May
2024**

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Section 1

Written Comments

Section 1. 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*

Section 2

CRA Performance Evaluation

Section 2. 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 September 6, 2022.

Refer to the attached report on the following pages.

PUBLIC DISCLOSURE

September 6, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

US Metro Bank
Certificate Number: 58310

9866 Garden Grove Boulevard
Garden Grove, California 92844

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.

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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.

The Lending Test is rated Satisfactory.

The average net loan-to-deposit ratio is reasonable. The institution originated or purchased a majority of its loans inside its assessment area. The geographic distribution of small business loans reflects excellent dispersion throughout the assessment area. The distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes. The institution has received no CRA-related complaints since the prior CRA Evaluation.

The Community Development Test is rated Satisfactory.

The institution demonstrated adequate responsiveness to community development needs in the assessment area through community development loans, qualified investments, and community development services, considering the institution's capacity and the need and availability of such opportunities.

DESCRIPTION OF INSTITUTION

US Metro Bank (USMB) is a California-chartered commercial bank headquartered in Garden Grove, California. Since January 2020, the bank is wholly owned by US Metro Bancorp, a one-bank holding company headquartered in Garden Grove. The bank is the majority owner of Metro Home LLC, a subsidiary that originates consumer residential mortgage loans. The bank received a "Satisfactory" rating at its prior FDIC CRA Evaluation dated August 5, 2019, based on Interagency Intermediate Small Institution Examination Procedures.

USMB operates six full-service offices in Los Angeles and Orange Counties in Southern California. Since the prior evaluation, the bank opened one branch in an upper-income area of Los Angeles County in December 2019. USMB further operates six loan production offices in California, Washington, and Texas. The bank closed loan production offices in King County, Washington; New York County, New York; and Gwinnett County, Georgia, in April 2020. The bank also opened loan production offices in King County, Washington, in November 2020; Riverside and Santa Clara Counties, California, in August 2021; and Fresno and Sacramento Counties, California, in January 2022. One of the closed loan production offices and two of the new loan production offices are in moderate-income areas with the rest in middle- and upper-income areas. The bank has not had any merger or acquisition activity since the prior evaluation. Alternate delivery systems include ATMs at 5 branches as well as online, mobile, and phone banking available 24 hours a day. Customers also have surcharge-free access to the nationwide MoneyPass ATM network.

USMB's business focus has not changed since the prior evaluation. The bank primarily offers commercial loans including commercial and multi-family real estate loans, business term loans and lines of credit, and commercial-purpose construction loans. USMB is a SBA Preferred Lender and offers a variety of loans guaranteed by the SBA including loans through the 7(a), 504, and Paycheck Protection Programs (PPP). USMB also offers warehouse lines of credit to finance consumer residential mortgage lenders. The bank does not offer consumer-purpose loan products. USMB further offers various commercial and consumer deposit accounts including checking, saving, money market, and time deposit accounts. Other banking services include remote deposit capture and treasury management services, safe deposit boxes, night depository, and cash vault services. Bill pay, mobile deposit, and person-to-person payment services are available through online and mobile banking.

According to the June 30, 2022 Call Report, the bank had total assets of \$1.1 billion, including \$876.4 million of total loans and \$58.6 million of total securities. The bank also had \$971.5 million in total deposits, \$103.3 million in equity capital, and 110 full-time employees. The loan portfolio primarily consists of commercial real estate loans. The table below shows the distribution of the loan portfolio by product type.

Loan Portfolio Distribution as of 6/30/2022		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	14,596	1.7
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	134,324	15.3
Secured by Multifamily (5 or more) Residential Properties	55,253	6.3
Secured by Nonfarm Nonresidential Properties	581,824	66.4
Total Real Estate Loans	785,997	89.7
Commercial and Industrial Loans	50,014	5.7
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	40,346	4.6
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	(0)	(0.0)
Total Loans	876,357	100.0
<i>Source: Reports of Condition and Income 6/30/2022</i>		

The bank does not face any financial, legal, or other impediments that would limit the institution's ability to meet the credit needs of its assessment area.

DESCRIPTION OF ASSESSMENT AREA

USMB delineated an assessment area comprising four counties in Southern California: Los Angeles and Orange Counties, which compose the Los Angeles-Long Beach-Anaheim MSA, and San Bernardino and Riverside Counties, which compose the Riverside-San Bernardino-Ontario MSA. Together, all four counties encompass part of the larger Los Angeles-Long Beach CSA. Examiners

analyzed the performance in each MSA separately and determined the performance was similar. As a result, this Performance Evaluation presents the MSAs together. The assessment area is unchanged since the prior evaluation.

Economic and Demographic Data

The following table details economic and demographic information in the assessment area.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low %of#	Moderate %of#	Middle %of#	Upper %of#	NA* %of#
Geographies (Census Tracts)	3,751	8.2	28.4	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	6,062,644	6.9	26.2	28.7	37.9	0.3
Owner-Occupied Units by Geography	2,901,683	2.6	18.5	30.3	48.5	0.1
Occupied Rental Units by Geography	2,684,296	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	1,859,232	4.8	20.2	26.4	47.1	1.6
Fanns by Geography	21,687	3.8	20.1	30.1	45.5	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 - 11244 Anaheim-Santa Ana-Irvine, CA		\$86,003	Median Housing Value			\$448,193
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA		\$62,703	Median Gross Rent			\$1,322
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA		\$61,507	Families Below Poverty Level			13.4%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*)The NA category consists of geographies that have no/ been assigned an income classification.</i>						

According to 2021 D&B demographic business data, 38.5 percent of businesses in the assessment area are in the service industry. Other large industries include retail trade at 11.2 percent and finance, insurance, and real estate at 10.0 percent. Small businesses constitute the majority of businesses in the assessment area, as 63.0 percent have 4 or fewer employees and 93.5 percent operate from a single location.

According to Moody's Analytics as of May 2022, the economy in Orange County is recovering after the COVID-19 pandemic but the recovery is below national and state averages. Consumer service and manufacturing businesses have been the slowest to recover. Technology job growth in Orange County has slowed due to recession concerns and higher interest rates, but employment exceeds pre-pandemic levels and the industry should provide well-paying jobs and a skilled workforce in the longer-term. Tourism has recovered beyond statewide averages and leisure/hospitality jobs have been increasing, but hotel demand remains below pre-pandemic levels

and the industry has experienced labor shortages. The largest employers in the area are Disney Resorts; University of California, Irvine; St. Joseph Health; Kaiser Permanente; and Target Brands, Inc.

Similarly, the economy in Los Angeles County is recovering slower than national and state averages, according to Moody's Analytics as of May 2022. However, job growth in the leisure/hospitality and healthcare industries has been strong, and the area remains a global center for tourism and entertainment, with entertainment jobs exceeding pre-pandemic levels. Similar to Orange County, the area has a growing technology industry that provides well-paying jobs, but hiring has slowed due to market conditions. The transportation and warehousing sector, supported by the Ports of Los Angeles and Long Beach, is critical to the area's economy as consumer spending on goods remains high and supply chain backlogs have improved. The largest employers in the area are Cedars-Sinai Medical Center; Los Angeles International Airport; University of California, Los Angeles; VXi Global Solutions; and The Walt Disney Company.

Conversely, according to Moody's Analytics in May 2022, the economic recovery in Riverside and San Bernardino Counties has exceeded the state averages and employment has surpassed pre-pandemic levels, led by the leisure/hospitality, retail, and logistics industries. Transportation, warehousing, and distribution businesses did relatively well during the pandemic due to increased online shopping and consumer spending on goods. The area has relatively lower business costs than Los Angeles and is adjacent to large metropolitan areas and transportation infrastructure. Other top sectors include healthcare and defense. The area has a young population and positive in-migration but also has lower educational attainment and fewer high-paying jobs compared to Los Angeles. The largest employers in the area are Stater Bros. Markets, Arrowhead Regional Medical Center, U.S. Marine Corp Air Ground Combat Center, Fort Irwin, and Walmart Inc.

The median family income in Orange County is elevated and significantly higher than the rest of the assessment area. The following table shows the median family incomes and income category thresholds in the assessment area during the evaluation period.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50%to<80%	Middle 80%to<120%	Upper 2:120%
Orange County				
2019 (\$97,900)	<\$48,950	\$48,950 to <\$78,320	\$78,320 to <\$117,480	≥\$117,480
2020 (\$103,000)	<\$51,500	\$51,500 to <\$82,400	\$82,400 to <\$123,600	≥\$123,600
2021 (\$106,700)	<\$53,350	\$53,350 to <\$85,360	\$85,360 to <\$128,040	≥\$128,040
Los Angeles County				
2019 (\$73,100)	<\$36,550	\$36,550 to <\$58,480	\$58,480 to <\$87,720	≥\$87,720
2020 (\$77,300)	<\$38,650	\$38,650 to <\$61,840	\$61,840 to <\$92,760	≥\$92,760
2021 (\$80,000)	<\$40,000	\$40,000 to <\$64,000	\$64,000 to <\$96,000	≥\$96,000
Riverside and San Bernardino Counties				
2019 (\$69,700)	<\$34,850	\$34,850 to <\$55,760	\$55,760 to <\$83,640	≥\$83,640
2020 (\$75,300)	<\$37,650	\$37,650 to <\$60,240	\$60,240 to <\$90,360	≥\$90,360
2021 (\$75,300)	<\$37,650	\$37,650 to <\$60,240	\$60,240 to <\$90,360	≥\$90,360

Source: FFIEC

High costs of living in Orange and Los Angeles Counties somewhat limit economic growth and have caused out-migration and worker shortages. With a median home price of \$515,607, housing costs in the two counties are elevated and make homeownership difficult; approximately 50.4 percent of housing units are rental units. Alternatively, Riverside and San Bernardino Counties have relatively lower costs of housing. The median housing value is \$246,946, and 79.7 percent of total housing units are 1 to 4 family units while only 34.9 percent are rental units,

The assessment area has high levels of income inequality, homelessness, and poverty, especially in Los Angeles, Riverside, and San Bernardino Counties. Unemployment rates in those three counties generally equaled or exceeded statewide and national averages during the evaluation period while unemployment in Orange County was the lowest in the assessment area. Unemployment increased significantly throughout the assessment area in 2020 and 2021 due to the pandemic but is currently similar to pre-pandemic levels. The following table displays the unemployment rates for the assessment area during the evaluation period.

Unemployment Rates				
Area	2019	2020	2021	July 2022
	%	%	%	%
Orange County	2.8	9.0	6.0	2.8
Los Angeles County	4.4	12.3	8.9	5.0
San Bernardino County	3.9	9.7	7.4	3.9
Riverside County	4.3	10.2	7.3	4.0
California Statewide Average	4.1	10.2	7.3	3.9
National Average	3.7	8.1	5.4	3.5

Source: US. Bureau of Labor Statistics

Competition

The market for financial services in the assessment area is highly competitive. According to FDIC Summary of Deposit data as of June 30, 2021, there were 124 financial institutions operating 2,723 full-service offices within the assessment area. Of these institutions, USMB ranked 54th with less than a 0.1 percent deposit market share. The market is primarily controlled by a small number of large national and regional institutions. Bank of America, JPMorgan Chase Bank, and Wells Fargo Bank combine to hold 47.2 percent of the deposit market, while the top 8 institutions together hold 73.3 percent of the deposit market.

The market for small business lending is also very competitive. Although USMB does not report loan data because of its asset size, reported loan data can be an indicator of credit demand and competition. In 2020, the most recent year with available aggregate reported data, 396 large institutions reported 638,609 small business loans totaling \$30.5 billion. These figures do not include all lenders, as small banks, credit unions, and non-depository lenders do not report small business loan data.

Community Contact

Examiners reviewed recent contacts with eight community organizations that serve the assessment area. A local business group said that the COVID-19 pandemic had significant negative effects including increasing unemployment and homelessness. The group identified small business and affordable housing as primary credit needs in the assessment area. An employment and job training organization said that many established businesses needed assistance during the pandemic, especially service businesses, and that needs were higher in underserved communities and for businesses that didn't have banking relationships prior to the pandemic. A small business development center similarly described the negative effects of the pandemic on small businesses and stated that small business lending was limited outside of SBA loans such as the PPP due to economic uncertainty. A second small business development center said that some areas were recovering from the pandemic better than others, and the need for small loans to very small or new businesses remained. The organizations identified small business loans, grant funding, financial education, and small business technical assistance as community development opportunities, especially for business owners that do not speak English or operate in historically underserved communities.

One affordable housing organization described the difficulties that individuals of all income levels had experienced during the COVID-19 pandemic and identified homelessness, home foreclosures, and evictions as significant issues. Another housing organization in Los Angeles County identified affordable housing as a primary need in the area, in addition to financial education. The organizations identified affordable housing, homeownership counseling, financial education, rental assistance, foreclosure prevention, and down payment assistance as credit and community development needs. The organizations described opportunities through board leadership, volunteer services, and financing of affordable housing projects and organizations through loans, tax credits, and grants.

Finally, a community development organization said that it can be difficult for low- and moderate-income individuals, especially those that do not speak English, to save money and obtain credit. The organization described economic challenges that low- and moderate-income individuals face due to costly housing, minimal or poor credit histories, and limited financial education; it identified credit counseling, affordable housing, and small dollar loans as primary needs. Furthermore, a youth financial education organization stated that the pandemic negatively affected schools and the ability to provide in-person education and other services. Both organizations described needs for grant funding and volunteers, especially in underserved communities.

Credit and Community Development Needs and Opportunities

Based on economic and demographic data, community contacts, and information from bank management and public sources, examiners identified needs for small business loans, affordable housing, and community services in the assessment area. There are significant needs for small business credit as indicated by the large number of small businesses and strong credit demand; these needs are especially strong for businesses that are very small or start-ups and/or that operate in low- and moderate-income or historically underserved areas. Small businesses were particularly impacted by the COVID-19 pandemic and associated public health restrictions, increasing the need for small business credit in 2020 and 2021. In addition to small business loans, community development opportunities exist through technical assistance and grant funding or volunteer services supporting small business development organizations.

Additionally, there are strong credit and community development needs related to affordable housing. According to economic information and community contacts, housing costs are high and increasing, and the pandemic resulted in increased unemployment and economic uncertainty for many low- and moderate-income individuals. Community development opportunities include financing affordable housing projects and supporting affordable housing organizations through grants and volunteer services.

Finally, there are ongoing needs for community services including financial education and social services. Portions of the assessment area have elevated levels of poverty and homelessness, and needs increased in 2020 and 2021 as more individuals required assistance during the pandemic. Opportunities include grant funding and volunteer services, although there were fewer opportunities to provide in person community development services during the pandemic due to public health restrictions on public gatherings.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the prior evaluation dated August 5, 2019, to this evaluation dated September 6, 2022. Examiners used Interagency Intermediate Small Institution Examination procedures. Examiners used full-scope procedures on the sole assessment area and relied on records provided by the institution, public financial and economic information, demographic data, and community contacts. Examiners did not consider any activities by affiliates.

Activities Reviewed

USMB's major product line is small business loans based on its business strategy, loan portfolio composition, and lending activity during the evaluation period. Examiners analyzed all small business loans originated or purchased from January 1, 2019, through December 31, 2021. This evaluation period includes every full calendar year since the prior evaluation. USMB is not required to report small business loan data because of its asset size, but the institution collected loan data and provided it for analysis.

The bank elected to have its PPP lending volume split between the Lending and Community Development Tests. The bank designated PPP loans in the assessment area with loan amounts over \$1.0 million, as well as PPP loans with loan amounts between \$250,000 and \$1.0 million to businesses located in low- and moderate-income areas, as community development loans under the Community Development Test. This evaluation considers the remaining **PPP** loans as small business loans under the Lending Test. Including PPP loans, the bank made 1,527 small business loans totaling \$277.3 million in the evaluation period, including 394 non-PPP small business loans totaling \$194.3 million and 1,133 PPP loans totaling \$83.0 million.

Examiners did not analyze home mortgage loans because of the limited loan volume. The bank originated or purchased 92 home mortgage loans totaling \$12.6 million from 2019 through 2021. In 2019 and 2020, home mortgage lending was limited in volume and consisted of commercial-purpose loans secured by residential or multi-family properties. Home mortgage loan volume increased in 2021, primarily due to loan purchases; however, given the concurrent increase in small business loan volume due to PPP lending, home mortgage lending still represented a relatively small percentage of lending activity. Additionally, the bank does not originate or purchase small farm or consumer loans. None of these loan products represent major product lines during the evaluation period, and examiners did not consider them in this Performance Evaluation.

The COVID-19 pandemic led to economic fluctuations, public health restrictions, and loan programs such as the PPP that significantly affected market conditions, credit needs, and lending volumes in 2020 and 2021. As a result, this evaluation presents the performance from all three years in the evaluation period under each criteria.

Examiners additionally reviewed all community development loans, qualified investments, and community development services from the prior evaluation dated August 5, 2019, through the current evaluation dated September 6, 2022. Examiners evaluated community development activity quantitatively based on the financial capacity of the bank and qualitatively based upon the impact to the assessment area.

Examiners primarily compared the lending performance to D&B business demographic data. Examiners also compared the lending and community development performance to the prior evaluation and to comparable institutions. Examiners focused on the number of loans more than the dollar volume of lending because it is a better indicator of the number of businesses served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The performance under the Lending Test is "Satisfactory." The excellent geographic distribution of loans and reasonable distribution of borrowers primarily support this conclusion.

Loan-to-Deposit Ratio

USMB's average net loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. The loan-to-deposit ratio averaged 84.6 percent over the past 12 calendar quarters from September 30, 2019, through June 30, 2022. The ratio ranged from a low of 78.3 percent as of September 30, 2021, to a high of 89.4 percent as of September 30, 2020. Over the evaluation period, the average loan-to-deposit ratio was slightly lower than two comparable institutions with reasonable performance and significantly lower than one comparable institution with more than reasonable performance. Examiners selected these institutions based on their asset size, geographic location, and lending focus. The following table shows the average net loan-to-deposit ratio of USMB and the comparable banks during the evaluation period.

Loan-to-Deposit Ratio Comparison		
Bank	Total Assets as of 6/30/2022 (\$000s)	Average Net Loan-to- Deposit Ratio (%)
US Metro Bank	1,081,641	84.6
Comparable Institution #1	929,100	87.5
Comparable Institution #2	1,030,111	89.6
Comparable Institution #3	1,252,944	111.2
<i>Source: Reports o/Condition and Income 9/30/2019- 6/30/2022</i>		

Assessment Area Concentration

USMB made a majority of small business loans inside the assessment area. Refer to the following table for details.

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										
2019	110	81.5	25	18.5	135	47,670	77.4	13,901	22.6	61,571
2020	669	85.6	113	14.5	782	81,637	81.5	18,578	18.5	100,215
2021	526	86.2	84	13.8	610	94,962	82.2	20,584	17.8	115,546
Total	1,305	85.5	222	14.5	1,527	224,269	80.9	53,063	19.1	277,332
<i>Source: Bank Data Drive to rounding, totals may not equal 100.0%</i>										

Geographic Distribution

The geographic dispersion of small business loans reflects excellent dispersion throughout the assessment area. The following table shows the distribution of loans by year and census tract income category.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2019	4.7	14	12.7	6,296	13.2
2020	4.7	81	12.1	8,885	10.9
2021	4.8	60	11.4	11,084	11.7
Moderate					
2019	20.0	49	44.5	24,194	50.8
2020	20.1	249	37.2	23,428	28.7
2021	20.2	217	41.3	38,064	40.1
Middle					
2019	26.6	27	24.5	10,267	21.5
2020	26.5	166	24.8	26,349	32.3
2021	26.4	141	26.8	26,808	28.2
Upper					
2019	47.2	19	17.3	6,738	14.1
2020	47.0	161	24.1	21,702	26.6
2021	47.1	102	19.4	18,240	19.2
Not Available					
2019	1.6	1	0.9	175	0.4
2020	1.6	12	1.8	1,273	1.6
2021	1.6	6	1.1	766	0.8
Totals					
2019	100.0	110	100.0	47,670	100.0
2020	100.0	669	100.0	81,637	100.0
2021	100.0	526	100.0	94,962	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%</i>					

Although the annual volume of lending varied significantly during the evaluation period due to the PPP in 2020 and 2021, the geographic distribution of loans was generally consistent. The distribution of lending in low- and moderate-income areas significantly exceeded the distribution of businesses. The performance is comparable to the excellent performance at the prior evaluation and to excellent performance at comparable institutions while exceeding peer institutions with reasonable performance.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes. The following table shows the distribution of loans by year and revenue level.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2019	88.6	38	34.5	17,933	37.6
2020	89.1	21	3.1	10,782	13.2
2021	90.4	57	10.8	35,397	37.3
>\$1,000,000					
2019	4.8	59	53.6	25,407	53.3
2020	4.5	53	7.9	25,403	31.1
2021	3.7	52	9.9	27,589	29.1
Revenue Not Available					
2019	6.5	13	11.8	4,330	9.1
2020	6.4	595	88.9	45,452	55.7
2021	5.9	417	79.3	31,976	33.7
Totals					
2019	100.0	110	100.0	47,670	100.0
2020	100.0	669	100.0	81,637	100.0
2021	100.0	526	100.0	94,962	100.0
<i>Source: 2019, 2020 & 2021 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%</i>					

The performance in 2019 is far below the distribution of businesses. Although not all small businesses have credit needs or are creditworthy, the performance was also below credit demand, as indicated by lending at comparable institutions and through aggregate reported small business loan data. The distribution of lending to business with revenues of \$1.0 or less million decreased in 2020 and 2021; however, the bank did not collect revenues for PPP loans, which accounted for the majority of small business loans during those two years. Considering only small business loans with collected revenues, USMB made 28.4 percent and 52.3 percent of its small business loans in 2020 and 2021, respectively, to businesses with revenues of \$1.0 million or less.

Examiners also evaluated loan amounts of PPP loans as a proxy for business size. Of the 582 PPP loans originated in the assessment area in 2020, 59.6 percent had loan amounts of less than \$50,000. Similarly, of the 399 PPP loans originated in the assessment area in 2021, 59.9 percent had loan amounts of less than \$50,000. This level is significant because in order to qualify for a **PPP** loan of this amount, the average monthly business payroll expense could not exceed \$20,000. While business payroll expenses vary by industry and business, most payrolls fall somewhere between 20.0 and 35.0 percent of gross revenues. It is likely that businesses that qualified for PPP loans in amounts of less than \$50,000 were small businesses. The PPP lending reflects positively on the 2020 and 2021 small business lending performance and indicates that the institution was responsive to increased loan demand during the COVID-19 pandemic. The following table displays PPP loans by year and loan size.

Distribution of PPP Loans Made in the Assessment Area by Loan Size				
Loan Size	#	%	\$(000s)	%
2020				
< \$50,000	347	59.6	7,708	18.3
\$50,000 - \$99,999	112	19.2	7,851	18.7
\$100,000 - \$249,999	98	16.8	15,613	37.1
\$250,000 - \$1,000,000	25	4.3	10,881	25.9
Subtotal	582	100.0	42,053	100.0
2021				
< \$50,000	239	59.9	5,586	20.5
\$50,000 - \$99,999	88	22.1	6,295	23.1
\$100,000 - \$249,999	54	13.5	8,704	32.0
\$250,000 - \$1,000,000	18	4.5	6,640	24.4
Subtotal	399	100.0	27,225	100.0
Total	981	100.0	69,278	100.0
<i>Source: Bank Data</i>				
<i>Due to rounding, totals may not equal 100.0%</i>				

Response to Complaints

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

COMMUNITY DEVELOPMENT TEST

The performance under the Community Development Test is "Satisfactory." The performance demonstrates adequate responsiveness to community development needs in the assessment area through community development loans, qualified investments, and community development services. Community development lending and services primarily support this conclusion. The community development activities primarily supported economic development, a critical need in the assessment area during the evaluation period.

Community Development Loans

USMB made 87 community development loans totaling \$155.9 million, including 41 PPP loans totaling \$27.4 million. The total represents 19.4 percent of average total assets and 25.5 percent of average total loans since the prior evaluation. Excluding PPP lending, USMB made 46 community development loans totaling \$128.4 million, which represents 10.6 percent of average total assets and 21.0 percent of average total loans since the prior evaluation. The level of lending exceeds the prior evaluation, although the performance is similar considering the growth of the bank. The lending also generally exceeds comparable institutions with reasonable performances. The following table displays the distribution of community development loans by year and purpose.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
8/5/2019 - 12/31/2019	0	0	0	0	8	18,153	0	0	8	18,153
2020	0	0	1	123	10	21,287	19	11,713	30	33,123
2021	0	0	1	123	19	53,812	17	21,672	37	75,607
YTD 2022	0	0	0	0	12	28,993	0	0	12	28,993
Total	0	0	2	246	49	122,245	36	33,385	87	155,876
<i>Source: Bank Data</i>										

USMB's community development lending primarily benefitted economic development and stabilization of low- and moderate-income areas through business retention, largely through PPP and other SBA loans. The lending was responsive to the small business credit needs of the assessment area, especially to businesses that suffered from the economic effects of the COVID-19 pandemic. Notable examples of community development loans are described below.

- USMB made 20 loans totaling \$47.6 million to clothing import, wholesale, and retail small business that operate in the Fashion District and adjacent parts of Los Angeles. The loans allowed the businesses to purchase real estate, expand operations, and/or obtain working capital. For example, the bank originated a loan totaling \$3.9 million to an apparel retailer to purchase a warehouse for inventory storage in a low-income area. The borrower hired 15 additional employees, of which 13 were warehouse workers that were likely low- or moderate-income. The loans supported economic development and benefitted job creation for low- and moderate-income individuals and in low- and moderate-income areas.
- The bank originated a loan for \$1.9 million to re-build or re-locate a restaurant after significant fire damage. The restaurant operated in a low-income area and employed approximately 12 individuals. Once the borrower re-opens, they expect to re-hire the same number of employees. The loan funds will create jobs for low- and moderate-income restaurant workers
- The bank originated a loan for \$14.2 million that refinanced a SBA 504 loan and helped revitalize and stabilize a moderate-income area. The borrower used the loan to purchase a large, owner-occupied industrial building and convert the building into a multi-tenant space, moving their operations into the building and also attracting other businesses. The loan proceeds helped attract new businesses into the moderate-income area.
- The bank originated 2 SBA 504 loans totaling \$5.1 million to provide long-term financing for the construction of a car wash. The borrower expects to hire approximately 12 employees, of which 10 will likely be low- or moderate-income based on their salaries.

Qualified Investments

USMB made 10 qualified investments totaling \$3.0 million. This performance represents 0.4 percent of average total assets and 11.5 percent of average total securities since the prior evaluation. The level of investments is similar to the prior evaluation and generally lower than comparable institutions with reasonable performances.

The qualified investments include 6 deposits in Minority Depository Institutions and/or CDFIs totaling \$3.0 million as well as 4 qualifying donations totaling \$12,000 that supported community services for low- and moderate-income areas and individuals. The largest donation totaled \$10,000 and supported an organization that provides career and educational services primarily to low-income women.

The volume of qualified investments and responsiveness to community development needs and opportunities is limited, partially due to the bank's business strategy, investment resources, and community development focus. Additionally, while the COVID-19 pandemic increased the need for grant funding for many organizations, the pandemic and associated public health restrictions limited the opportunities to develop partnerships with community development organizations.

Community Development Services

Six USMB employees provided 792 hours of community development services in partnership with 3 organizations. The number of employees providing services represents 6.3 percent of average total full-time employees since the prior evaluation, and the volume of services equals 2.8 hours annually per average full-time employee. The performance exceeds the prior evaluation and generally exceeds comparable institutions with reasonable performances. The following table displays the distribution of community development services by year and purpose.

Community Development Services					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or stabilize	Totals
	#	#	#	#	#
8/5/2019 - 12/31/2019	0	10	0	0	10
2020	0	123	0	0	123
2021	0	523	9	0	532
YTD 2022	0	123	4	0	127
Total	0	779	13	0	792

Source: Bank Data

USMB primarily provided community services for low- and moderate-income individuals and areas. The institution's innovativeness and responsiveness are satisfactory, particularly when considering the limited opportunities for in-person services during the COVID-19 pandemic. Bank employees used technology to provide virtual services or created their own channels to deliver services. Notable examples of community development services are described below.

- One employee provided a total of 626 hours of financial expertise by working with a local

organization to help low- and moderate-income individuals complete their tax returns. In 2021, the employee provided services virtually because of public health restrictions on in-person gathering, which enabled them to serve a higher number of individuals.

- One employee served a total of 121 hours on the Board of Directors and Finance Committee for an organization that provides career and educational services. The organization primarily serves low- and moderate-income women who are unemployed or underemployed by providing employment workshops, job search assistance, computer training, and professional apparel.
- Four employees created and presented two educational workshops on SBA lending products. The employees delivered the workshops at the loan production office in a moderate-income area in Riverside County, and 12 of the 20 businesses that attended operate in low- or moderate-income areas. The services totaled 13 hours and helped support economic development of small businesses in low- and moderate-income areas.

USMB's retail banking services also benefit low- and moderate-income individuals and areas. The bank operates three branch offices in moderate-income areas, representing 50.0 percent of all branches and containing 59.2 percent of total deposits according to June 30, 2021 FDIC Summary of Deposit data. The bank additionally operates two ATMs and a loan production office in moderate-income portions of the assessment area.

The bank also offers low-cost consumer deposit accounts at all branch offices, including a checking account with a very low minimum opening balance and no monthly service fee. The bank holds 1,841 such checking accounts with \$57.7 million in deposits. The bank further offers a low-cost checking account for individuals aged 65 years or older with no minimum opening balance or monthly service fee. The bank holds 21 such accounts with \$89,283 in deposits. These retail banking services and delivery systems help make banking products and services accessible in moderate-income communities and to low- and moderate-income individuals.

Finally, the bank offered 90-day payment deferrals to commercial loan borrowers that experienced financial hardship because of the pandemic in 2020. The bank granted deferrals on 106 loans totaling \$139.3 million, of which 75 loans totaling \$96.2 million were inside the assessment area. The payment deferrals were especially responsive to credit and community development needs during the pandemic and primarily benefitted business and job retention in low- and moderate-income areas, as the distribution of deferrals in low- and moderate-income areas inside the assessment area significantly exceeded the distribution of businesses. The following table displays the distribution of payment deferrals inside the assessment area by census tract income category.

Geographic Distribution of COVID-19 Payment Deferrals in the Assessment Area					
Tract Income Level	%of Businesses	#	%	\$(000s)	%
Low	4.7	6	8.0	11,629	12.1
Moderate	20.1	34	45.3	41,178	42.8
Middle	26.5	19	25.3	25,128	26.1
Upper	47.0	14	18.7	15,426	16.0
Not Available	1.6	2	2.7	2,818	2.9
Total	100.0	75	100.0	96,179	100.0
<i>Source: 2020 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%</i>					

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.

APPENDICES

INTERMEDIATE 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).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

GLOSSARY

Aggregate Lending: The number of Joans 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.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
 - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

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.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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.

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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.

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

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 Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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.

Section 3

Corporate Headquarters & List of Branches

Section 3. Corporate Headquarters & List of Branches

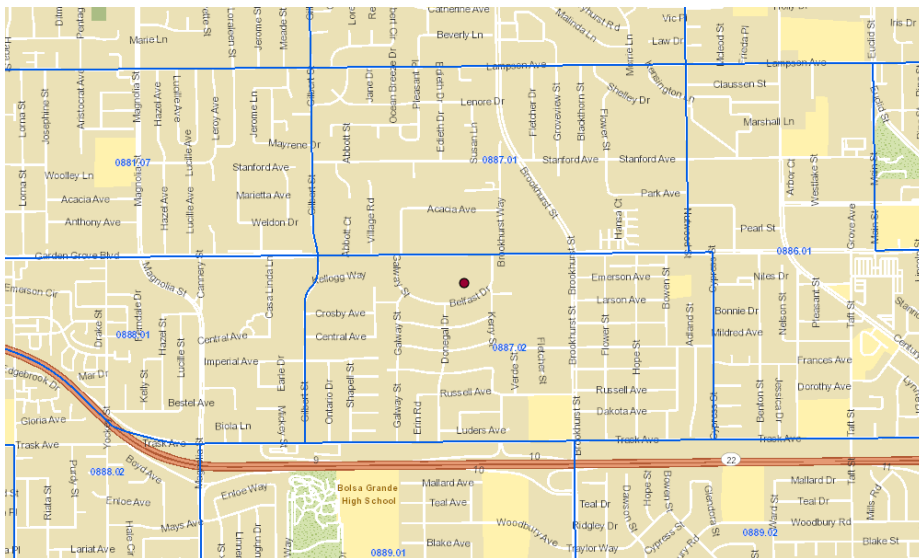
This section contains a list of the Bank's branches, their street addresses, and geographies.

Corporate Headquarters

Address: 9866 Garden Grove Blvd., Garden Grove, CA 92844
MSA/MD Code: 11244 (Anaheim-Santa Ana-Irvine, CA MD)
Census Tract: 0887.02
Tract Income Level: Moderate

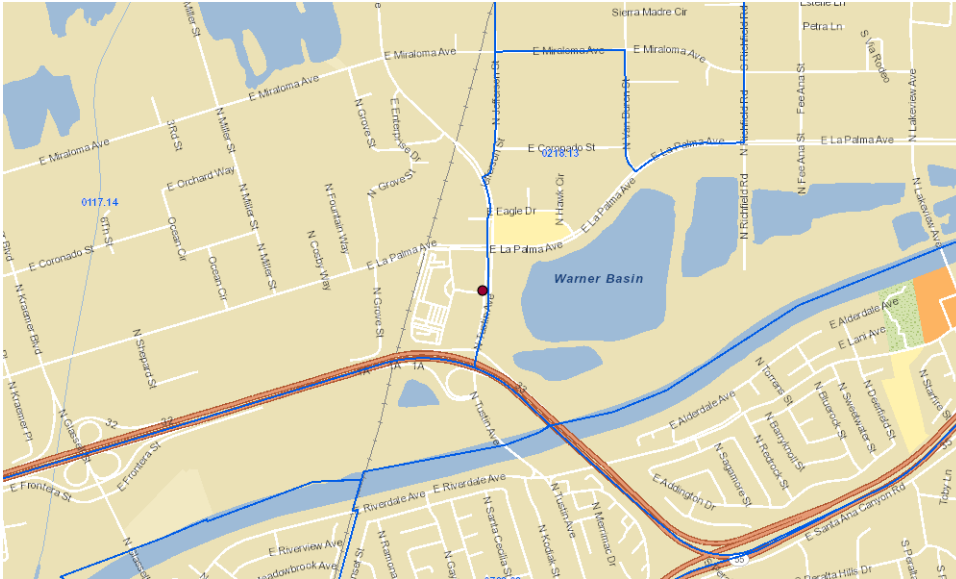
Garden Grove Branch

Address: 9866 Garden Grove Blvd., Garden Grove, CA 92844
MSA/MD Code: 11244 (Anaheim-Santa Ana-Irvine, CA MD)
Census Tract: 0887.02
Tract Income Level: Moderate



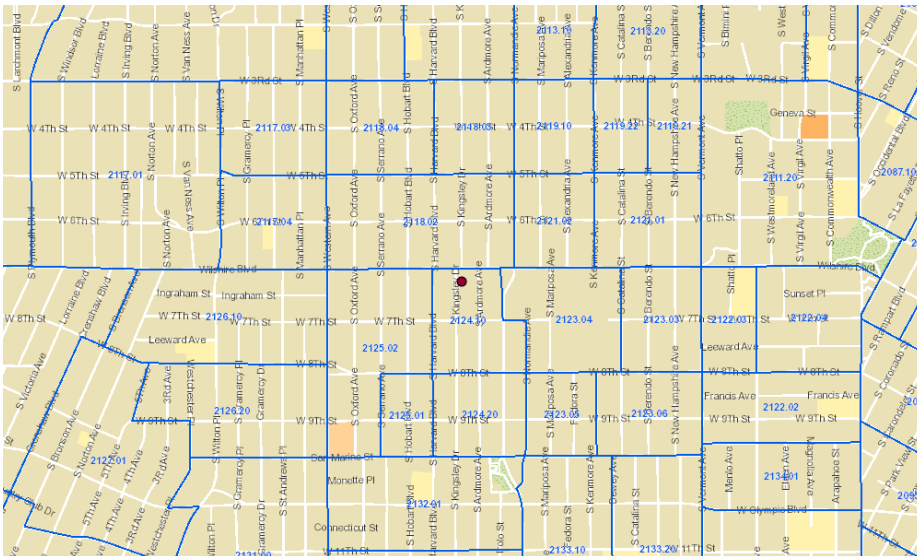
Anaheim Branch

Address: 1055 N. Tustin Ave., Anaheim, CA 92807
MSA/MD Code: 11244 (Anaheim-Santa Ana-Irvine, CA MD)
Census Tract: 0117.14
Tract Income Level: Middle



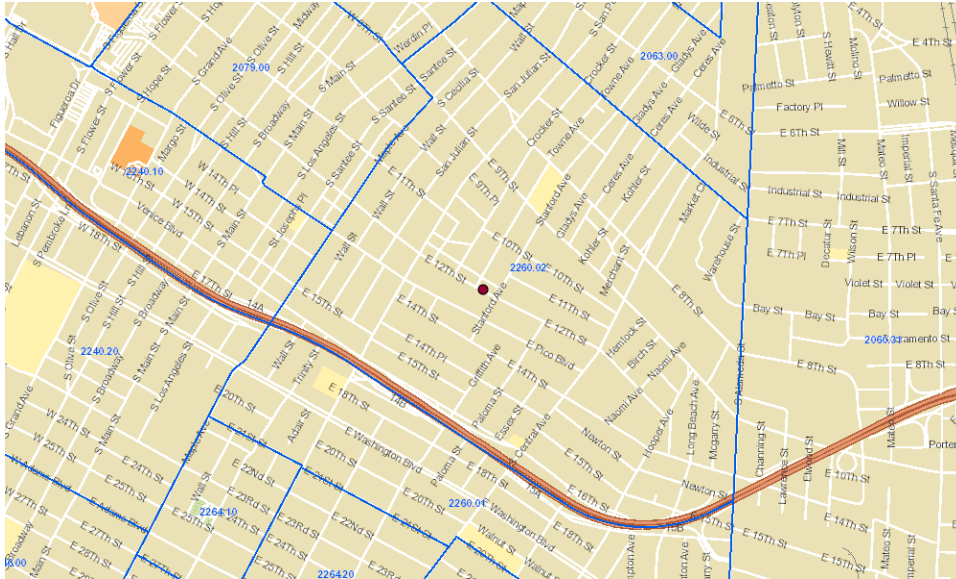
Wilshire Branch

Address: 3580 Wilshire Blvd., Suite 101, Los Angeles, CA 90010
MSA/MD Code: 31084 (Los Angeles-Long Beach-Glendale, CA MD)
Census Tract: 2124.10
Tract Income Level: Moderate



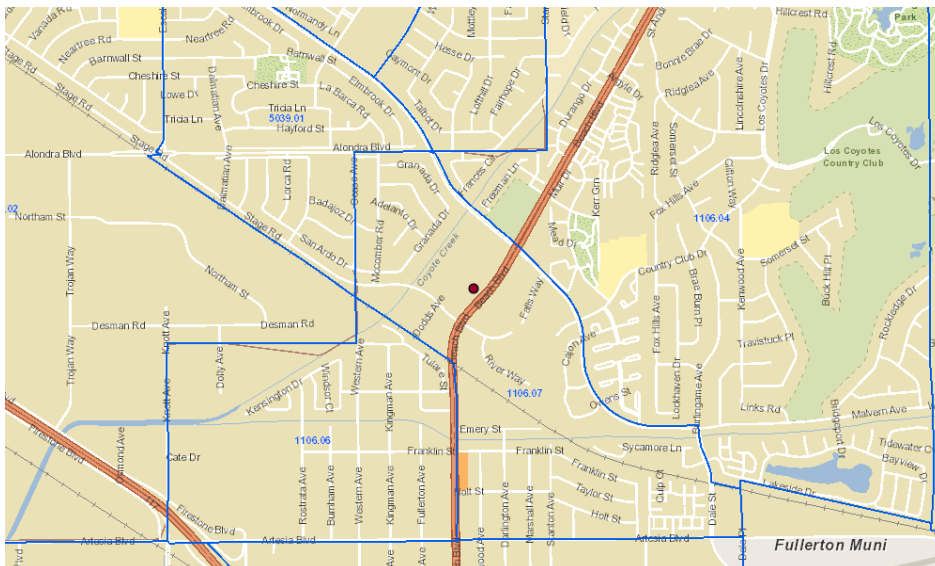
Downtown Branch

Address: 807 E. 12th St., Suite 400, Los Angeles, CA 90021
MSA/MD Code: 31084 (Los Angeles-Long Beach-Glendale, CA MD)
Census Tract: 2260.02
Tract Income Level: Moderate



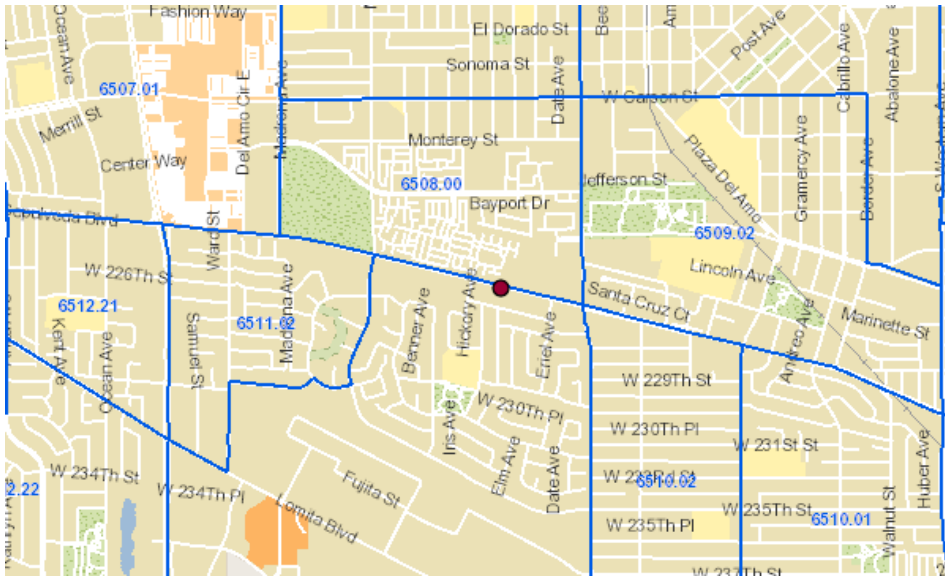
Fullerton Branch

Address: 5401 Beach Blvd., Buena Park, CA 90621
MSA/MD Code: 11244 (Anaheim-Santa Ana-Irvine, CA MD)
Census Tract: 1106.07
Tract Income Level: Middle



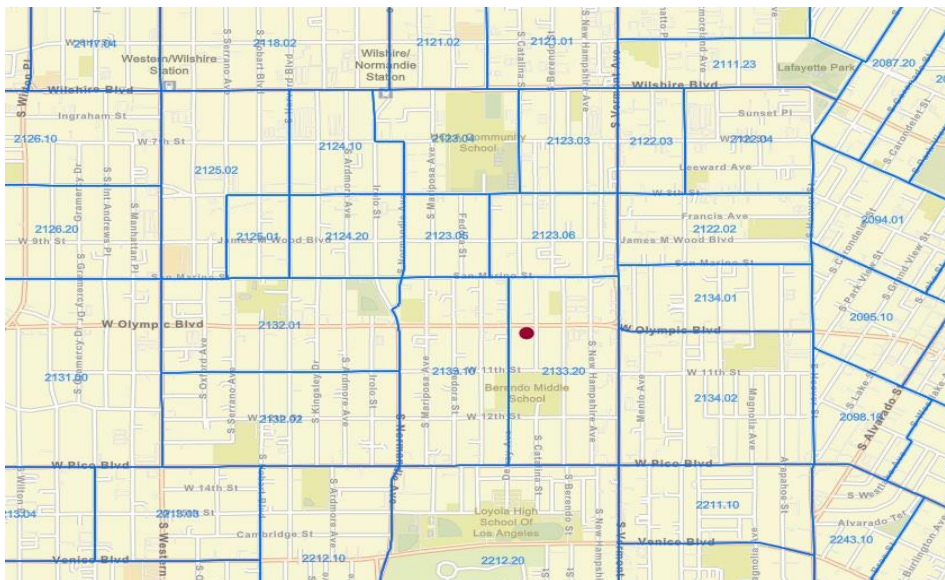
Torrance Branch

Address: 2742 W. Sepulveda Blvd., Torrance, CA 90505
MSA/MD Code: 31084 (Los Angeles-Long Beach-Glendale, CA MD)
Census Tract: 6511.01
Tract Income Level: Upper



Olympic Branch

Address: 2800 W. Olympic Blvd., Suit C, LA, CA 90006
MSA/MD Code: 31084 (Los Angeles-Long Beach-Glendale, CA MD)
Census Tract: 2133.20
Tract Income Level: Middle



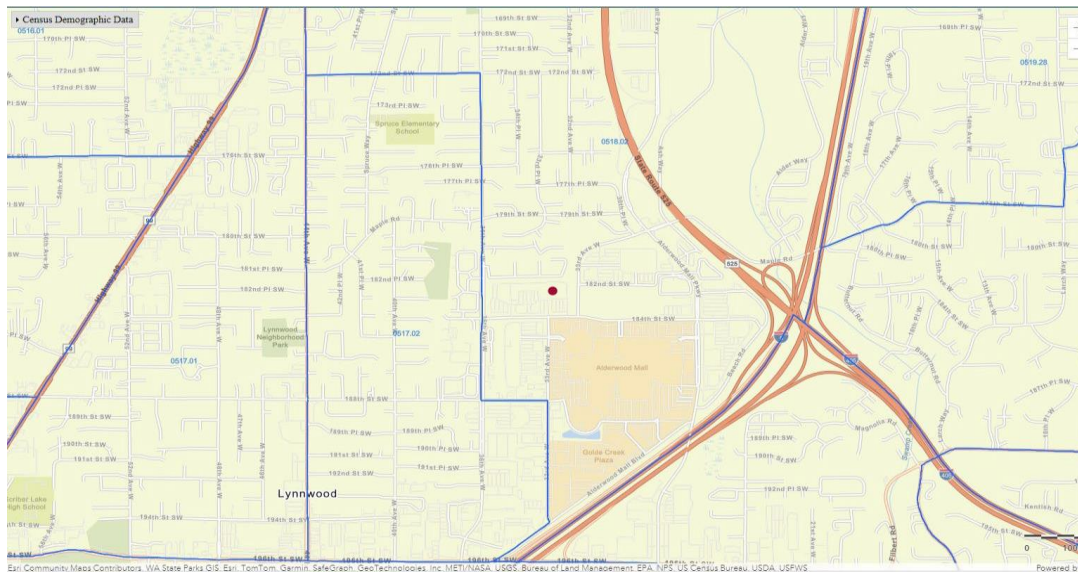
Lynnwood, Washington Branch

Address: 3301 184th St, SW # 125, Lynnwood, WA 98037

MSA/MD Code: 42644 (Seattle – Bellevue – Kent, WA MD)

Census Tract: 0518.02

Tract Income Level: Middle



Section 4

List of Branches Opened or Closed

Section 4. 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 Opened

Lynnwood Branch, Washington State

Address: 3301 184th St. SW #125, Lynnwood, WA 98037
MSA/MD Code: 42644 (Seattle-Bellevue-Kent, WA MD)
Census Tract: 0518.02
Tract Income Level: Middle
Map: *Refer to Section 3*
Opened: April 17, 2023

Olympic Branch, California State

Address: 2800 W. Olympic Blvd., Suite C, LA, CA 90006
MSA/MD Code: 31084 (Los Angeles-Long Beach-Glendale, CA MD)
Census Tract: 2133.20
Tract Income Level: Middle
Opened: December 19, 2023

Branches Closed

NONE

Section 5

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

Garden Grove Branch

Address: 9866 Garden Grove Blvd., Garden Grove, CA 92844
Telephone: (714) 620 – 8888
Hours: 9:00 am – 5:00 pm (Monday – Friday)

Anaheim Branch

Address: 1055 N. Tustin Ave., Anaheim, CA 92807
Telephone: (714) 399 – 0007
Hours: 9:00 am – 5:00 pm (Monday – Friday)

Wilshire Branch

Address: 3580 Wilshire Blvd., Suite 101, Los Angeles, CA 90010
Telephone: (213) 201 – 3300
Hours: 9:00 am – 5:00 pm (Monday – Friday)

Downtown Branch

Address: 807 E. 12th St., Suite 400, Los Angeles, CA 90021
Telephone: (213) 373 – 9300
Hours: 9:00 am – 5:00 pm (Monday – Friday)

Fullerton Branch

Address: 5401 Beach Blvd., Buena Park, CA 90621
Telephone: (714) 367 – 3888
Hours: 9:00 am – 5:00 pm (Monday – Friday)

Torrance Branch

Address: 2742 W. Sepulveda Blvd., Torrance, CA 90505
Telephone: (424) 360 – 1900
Hours: 9:00 am – 5:00 pm (Monday – Friday)

Lynnwood Branch

Address: 3301 184th St. SW Suite 125, Lynnwood, WA 98037
Telephone: (425) 758 - 2123
Hours: 9:00 am – 5:00 pm (Monday – Friday)

Olympic Blvd Branch

Address: 2800 W. Olympic Blvd, Los Angeles, Ca 90006

Telephone: (213) 755-8130

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

Loan Products Available

Business Lines of Credit

- Financing for seasonal working capital, carrying accounts receivable and inventory, and cash reserves for future investment
- Secured and unsecured lines available depending upon financial strength of borrower
- Flexible terms and rates

Business Term Loans

- Financing for purchase of business, purchase of equipment, or permanent working capital
- Business assets (UCC) or real estate collateral
- Flexible terms and rates

Commercial Real Estate Loans

- Financing for owner-occupied and investor properties
- Short- or long-term financing options
- Flexible terms and rates

Construction Loans

- Construction financing for commercial or industrial buildings as well as single- or multi-family developments

SBA Loans

- SBA 7(a) Program
 - Financing for small businesses that operate for profit in the U.S.
 - Financing for purchase or refinance of real estate, business acquisition, equipment purchase, inventory purchase, or working capital
 - Maximum loan amount of \$5,000,000
 - Maximum term up to 25 years
 - Must meet SBA guidelines
- SBA 504 Program
 - Financing for small businesses for real estate or fixed assets
 - Requires participation with third-party lender with Bank providing 50% of requested loan amount

Warehouse Lending

- Warehouse lines of credit to mortgage finance businesses to support residential mortgage originations

Deposit Products Available

Refer to the attachments on the following pages.

Schedule of Fees and Charges

Refer to the attachments on the following pages.

Material Differences in Availability or Cost of Services

There are no material differences in the availability or cost of services at any of the Bank's six full-service branches.

PERSONAL DEPOSIT ACCOUNTS

Types of Account	Description	Min. Balance to Open	Interest/Interest Compound Method	Min. Balance to Avoid Imposition of Monthly Charge	Monthly Service/Maintenance Charge	Transaction Limitations and Features
METRO FAMILY Personal Checking	No monthly maintenance fee account with minimum opening balance.	\$1.00+ 1st check order fee	Not Applicable	NONE	NONE	Unlimited transactions. Free copy of check images with monthly statement. Limit one account per household.
STANDARD Personal Checking	A non-interest-bearing account designed as a basic checking product for consumers with average account activity.	\$100.00	Not Applicable	Daily-\$500 or Avg. Mo.-\$1,000	\$10 if balance falls below the minimum balance requirement.	Unlimited transactions, free bill pay. Free copy of check images with monthly statement.
SENIOR CITIZEN Personal Checking	Anon-interest bearing account for those 65 years and over.	\$1.00+ 1st Check Order Fee	Not Applicable	NONE	NONE	Must be 65 years or older. No interest, no monthly service charges, and no minimum balance to open the account. Free copy of check images with monthly statement.
SUPER NOW Account	Interest bearing transaction account for individuals.	\$1,000.00	Interest compound daily and paid monthly	Daily-\$2,500 or Avg. Mo.- \$5,000	\$10 if balance falls below the minimum balance requirement.	Unlimited transactions and withdrawals. Free copy of check images with monthly statement.
VALUE Money Market Account	An interest bearing, limited transaction checking account for individuals.	\$1,000.00	Interest compound daily and paid monthly	Daily-\$2,500 or Avg. Mo.-\$5,000	\$10 if balance falls below the minimum balance requirement.	Transfers from this account to another account or to third parties by preauthorized, automatic, telephone or computer transfer (including bill payment) are limited to six (6) per month. An excess transfer fee of \$12 per item applies if these limits are exceeded. Account may be converted to a transaction account if the limits are exceeded.
Personal Savings	An interest-bearing account designed for individuals. This is a traditional savings account.	\$300.00	Interest compound daily and paid quarterly	Daily-\$300	\$5 if the balance falls below the minimum balance requirement.	Transfers from this account to another account or to third parties by authorized automatic, telephone or computer transfer (including bill payment) are limited to six (6) per month. An excess transfer fee of \$25 per item applies if these limits are exceeded.
KIDS Savings	An interest-bearing account designed for minors.	\$1.00	Interest compound daily and paid quarterly	NONE	NONE	Transfers from this account to another account or to third parties preauthorized, automatic, telephone or computer transfer (including bill payment) are limited to six (6) per month. An excess transfer fee of \$.25 per item applies if these limits are exceeded. Primary account holder must be a parent/guardian. Child cannot withdraw without a parent or guardian's signature. When the child reaches the age of 18, the account will automatically convert to a Personal Savings Account.

Installment Savings	Interest bearing, term savings account that allows individuals to make equal monthly deposits to receive a particular amount at the end of the term.	1st Month Installment amount	Interest compound daily and paid quarterly	Not Applicable	Not Applicable	Available Terms: 12 Mos; 24 Mos;36 Mos;
Certificates of Deposit	An investment account in which the Bank pays particular rate for a specific term.	\$1,000.00	Simple Interest. Paid monthly quarterly, yearly or a maturity	Not Applicable	Not Applicable	Available Terms: 3 Mos.to 36 Mos. Early withdrawal penalty applies. <=1Yr.- 1 month interest >1yr.- 3-month Interest *Fixed term or auto renewable

BUSINESS DEPOSIT ACCOUNTS

Types of Account	Description	Min. Balance to Open	Interest/ Interest Compound Method	Min. Balance to Avoid Imposition of Monthly Charge	Monthly Service/Maintenance Charge	Transaction Limitations and Features
BUSINESS SIMPLE Checking	A non-interest-bearing business account with minimum or moderate activity.	\$500.00	Not Applicable	NONE	\$8.00 for 30 debit transactions. In excess of 30 debits, \$0.50 per debit transaction will be assessed.	No minimum balance requirement. Monthly service fee of \$8.00 for up to 30 debit transactions per month. After that \$0.50 per debit will be assessed. Free copy of check images with monthly statement.
STANDARD Business Checking	A non-interest-bearing account designed for medium sized businesses with average amount of activity.	\$1,000.00	Not Applicable	Daily- \$2,000 or Avg. Mo.- \$3,000	\$10.00 plus \$0.25/ per debit transaction if the balance falls below the minimum balance requirement.	Unlimited transactions and withdrawals. Free copy of check images with monthly statement.
ANALYZED Business Checking	A full-service account for businesses with above average transaction activity. An earnings credit on the balances maintained at the Bank help offset the monthly service fees and per item charges.	\$1,000.00	Not Applicable	NONE	\$10 plus per item charges.	Non-interest-bearing account and no minimum balance requirement. A monthly maintenance fee of \$20.00 will be assessed, to which fees for services used are added. Please refer to the Analyzed Business Checking Account Brochure for a detailed listing of fees. Free copy of check images with monthly statement.
SUPER NOW Account	Interest bearing transaction account for sole proprietor attorney trust accounts and qualified non-profit organizations.	\$1,000.00	Interest compound daily and paid monthly	Daily- \$2,500 or Avg. Mo.- \$5,000	\$10 if balance falls below the minimum balance requirement.	Unlimited transactions and withdrawals. Free copy of check images with monthly statement.
VALUE Money Market Account	An interest bearing, limited transaction checking account for businesses.	\$1,000.00	Interest compound daily and paid monthly	Daily- \$2,500 or Avg. Mo.- \$5,000	\$10 if balance falls below the minimum balance requirement.	Transfers from this account to another account or to third parties by an authorized, automatic, telephone or computer transfer (including bill payment) are limited to six per month. An excess transfer fee of \$12 per item fee when these limits are exceeded. Account may be converted to a transaction account if the limits are exceeded.
Business Savings	An interest-bearing account designed for businesses. That has a traditional savings account.	\$300.00	Interest compound daily and paid quarterly	Daily- \$300	\$5 if balance falls below the minimum balance requirement.	Transfers from this account to another account or to third parties by authorized automatic, telephone or computer transfer (including Payment) are limited to 1x(6) per month. An excess transfer fee of \$25 per item applies if these limits are exceeded.

	SCHEDULE OF FEES AND CHARGES, EFFECTIVE JUNE 3, 2024		
Fee Category	Description of Fee	Fee Amount	
ATM/Debit Card	In-Network ATM Transaction (including Money Pass)	No fee	
	Out-of-Network ATM Transaction	Determined by ATM owner	
	Card replacement	\$10 per card	
	Card replacement - Rush Request	\$100 per card, upon request	
Cashier's Checks	Customer	\$5	
	Non-Customer (On-Us check exchange only)	\$15	
Check Printing	Check printing	Varies	
	Counter checks	\$1 per set of 4	
Close Account	Account closure within 90 days of open	\$50 each	
Collections	Canadian Check/Canadian Dollars	\$20 per check	
	Canadian Check/US Dollars	\$10 per check)	
	Domestic	\$40 (per item)	
	International (Non-Canadian Checks)	\$70 (per item)	
Escheatment Notice	Escheatment Notice	\$2 (per notice for CA only)	
Funds Transfer	Call Center/Branch	\$5 (per transaction)	
	Telebanking	\$3 (per transaction)	
Hold Mail	Hold for customer pick up at branch	\$25 (per month)	
Legal Process	For processing levy, garnishment, or other legal services	\$150 per occurrence	
	Record Search	\$50 per hour	
	Reproduction of Records	\$3 per item	
Negative Collected Balance <i>*Interest begins to accrue the day negative balance occurs and re remains</i>	Overdraft Interest Charge (Business Account Only)	22% per Annum	
	Use of Uncollected Balances Charge (Business Account Only)	22% per Annum	
Night Deposit	Annual fee	\$20 each	
	Night Depository Bag	\$20 each	
	Night Depository Bag Key	\$20 each	
Overdraft Charges/Fees	NSF/UCF resulting on overdrafts equal or under \$10	No fee	

**De-minimums amount \$10, Fees apply to overdrafts created by check,	NSF or UCF paid item(s) that overdraws your account	\$30 per item
<i>in-person withdrawal or other electronic means</i> <i>NSF: Non-Sufficient Fund UCF: Uncollected Fund</i>	NSF or UCF returned item(s) that overdraw your account.	\$33 per item
	Representation of check or ACH paid or returned	No Fee
	<i>For consumer account there is a daily cap of \$165 for NSF/UCF charges</i>	
Safe Deposit Box <i>Only available to a checking account holder with automatic payment from a checking or savings account</i>	Safe Deposit Box forced entry (drilled) or Lock/ Key Replacement	At cost
	Safe Deposit Box Key Deposit	\$200 one-time charge
	Safe Deposit Box Size and Rental Rates <i>(Assessed annually at lease renewal)</i>	
	3X5	\$55 per box
	5X5	\$100 per box
	3X10	\$120 per box
	5X10	\$200 per box
	10X10	\$400 per box
Statement	Special Handling Fee	\$25 per month
Stop Payment	Stop Payment Fee	\$30 (per stop)
Wire Transfer <i>Available only to US Metro Bank Customers</i>	Incoming Wire	\$10 (per wire)
	Incoming Wire returning fee	\$20 (per return)
	Outgoing Wire (domestic) - In Person	\$25 (per wire)
	Outgoing Wire (International) - In Person	\$35 (per wire)
	Outgoing Wire - Fax Request	\$40 (per wire)
	Outgoing Wire- Amendment/ Cancel/ Recall	\$25 (per request)
	Outgoing Wire - Trace	\$10 (per trace)
Other Services and Charges	Automatic Sweep to cover negative balance	\$5 each
	Amount/Deposit Certification (Account Balance) Bank Form	\$20 per account
	Deposit Correction Adjustment	\$5 per correction
	Image statement on CD-ROM	\$40 Per month
	IRA Account Set Up/Transfer Request	\$15 per account
	Non-customer Check Cashing Fee	\$5 (per check)
	Signature Guarantee	\$20 per request
	Verification of Deposit/Credit - via Mail, Fax, Walk In - pre- printed form.	\$20 (per request)

Account Analysis	Monthly Account Maintenance	\$20 per month
	MSB Set-Up Fee (As of February 2022, Bank no longer accepts New MSB)	\$200 per account
	Monthly MSB Maintenance Fee	\$300 per account
	Check Cashed	\$1 each
	Deposit Made	\$1 each
	Coin Deposited/Paid Out Roll/Box/Bag	\$0.10/\$5.00/\$15.00
	Currency Paid Out	\$1.20 per \$1000
	FRB Currency and Coin Deposit	\$15 per bag
	Cash Vault Service - Monthly Fee	\$100 per account
	Currency Deposited	\$1.20 per \$1000
	Check Paid / In-clearing or Transit	\$0.25 each
	Check Deposited	\$0.10 each
	ACH Debit / Credit	\$0.25 each
	Cash Order Preparation	\$3.00 per order
	Currency Transaction Report	\$5 per report
Treasury Management Service	ACH Batch File	\$10 per file
	ACH Origination	\$0.15 per item
	Originated ACH Return	\$10 per item
	BAI2 Reporting	At cost
	Online Wire	\$12 per request
	Positive Pay-Monthly Fee	\$50 per month
	Positive Pay-Exception Return Fee	\$10 per item
	RDC Deposit Posted	\$1 per deposit
	RDC Set-Up / ACH Training Fee	\$100 per account
	RDC Monthly Fee	\$50 per account
	RDC Scanner Purchase Cost	At cost
	RDC Scanner Rental Fee- Monthly	\$30 per month
	Smart Safe Deposit Services-Monthly Fee	\$50 per location

Section 6

List of Alternative Services

Section 6. List of Alternative Services

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

Alternative Services Available

ATM's

- Available at seven branches (no ATM at Downtown Branch)

Telephone Banking

- Telephone number: (866) 208 – 2511
- 24/7 access
- Automated service system available to all customers with an active account

Online and Mobile Banking

- Bill Pay
- Mobile Deposit
- Zelle

Treasury Management

- ACH Credit / Debit Origination
- Online Wire Origination
- Remote Deposit Capture (RDC)
- Positive Pay (check)

Section 7

Map of Assessment Areas

Section 7. Map of Assessment Areas

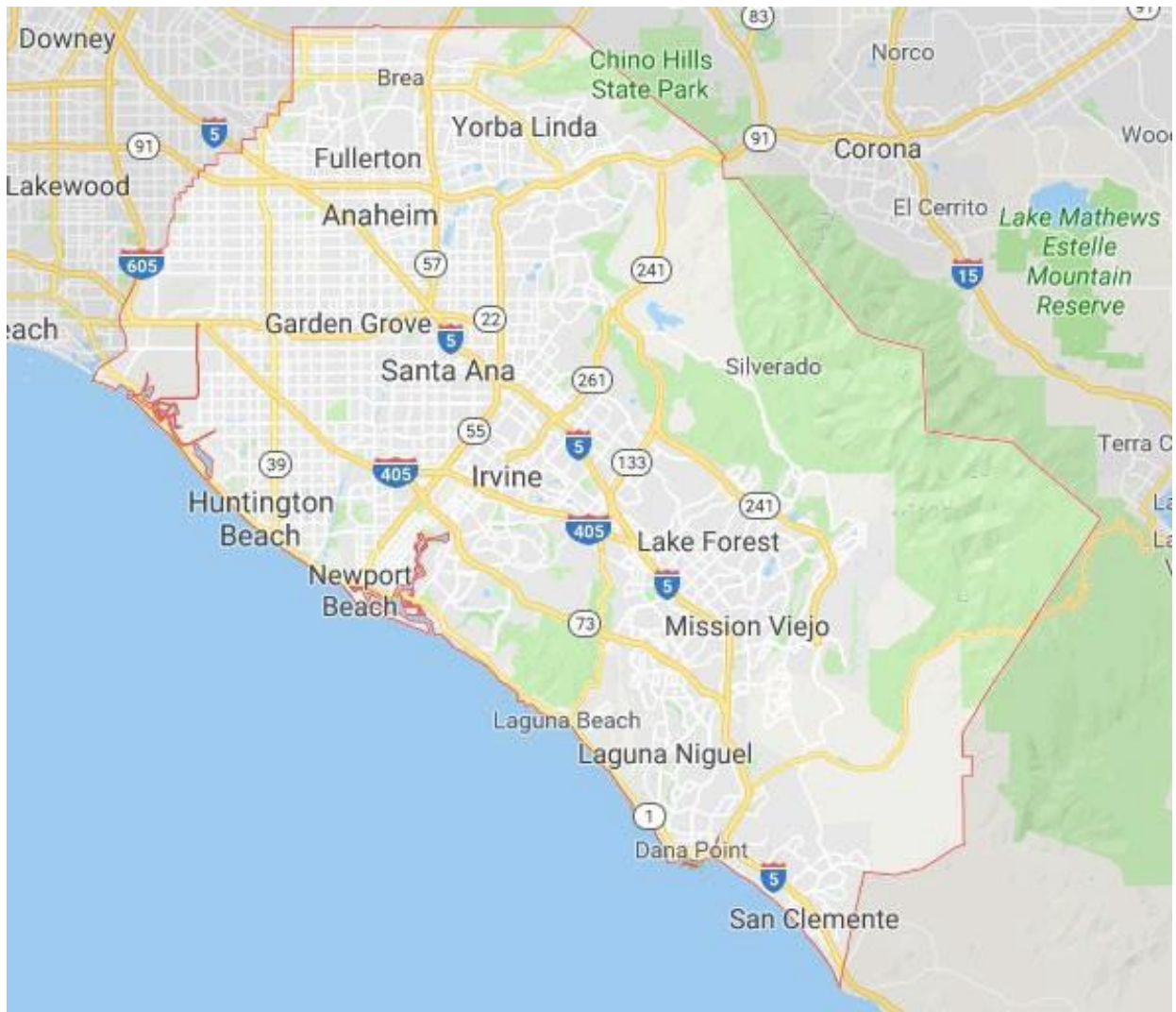
This section contains a map of each assessment area showing the boundaries of the area and identifying the geographies contained within the area, either on the map or in a separate list.

Bank's Assessment Areas

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

MD 11244 (Anaheim-Santa Ana-Irvine, CA Metropolitan Division)

Orange County, CA



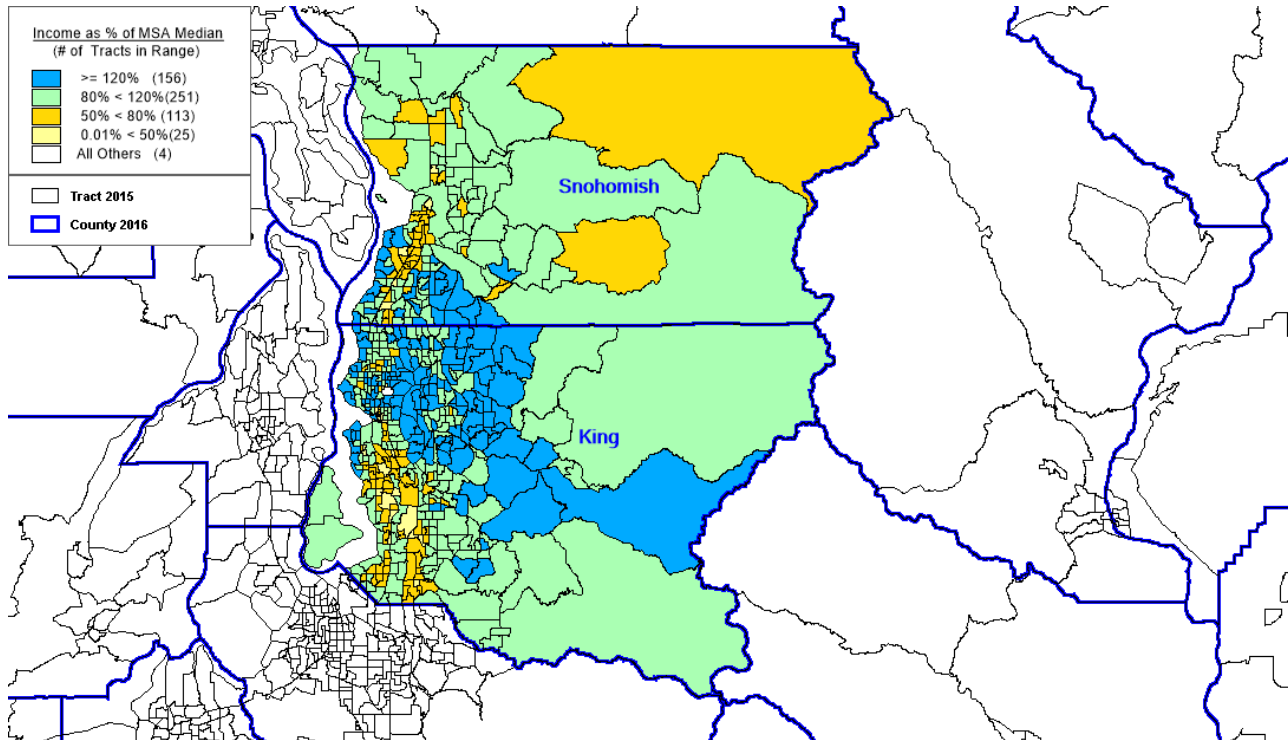
MD 31084 (Los Angeles-Long Beach-Glendale, CA Metropolitan Division)

Los Angeles County, CA



MD 42644 (Seattle-Bellevue-Kent, WA Metropolitan Division)

MAP OF SNOHOMISH & KING COUNTIES, WASHINGTON STATE



Refer to the appendix for the list of demographic information by census tract for each assessment area.

Section 8

Net Loan-to-Deposit Ratio

Section 8. 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.

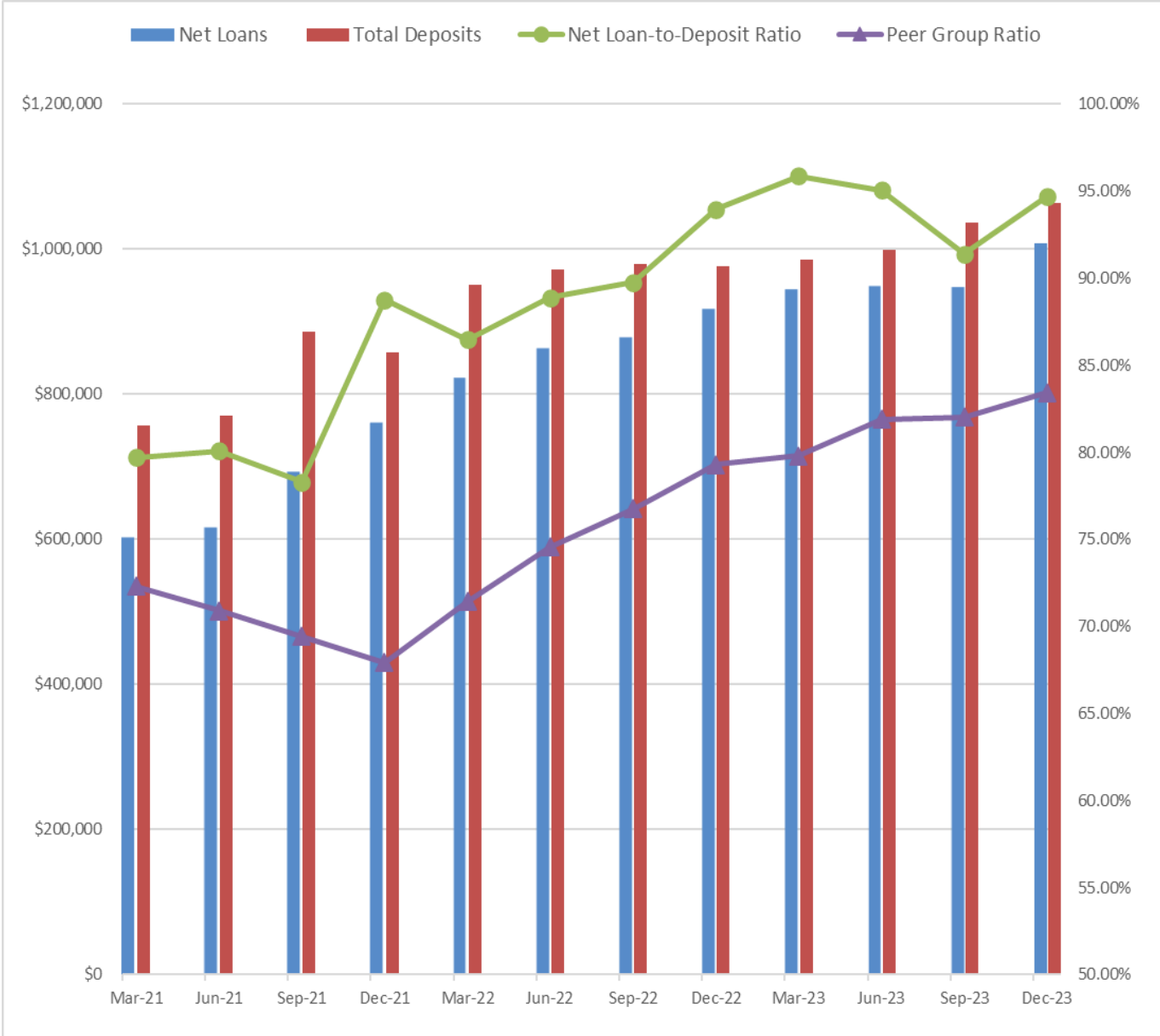
Net Loan-to-Deposit Ratio

Figures in 000's

Quarter-End Date	Net Loans ¹	Total Deposits ²	Net Loan-to-Deposit Ratio	Peer Group Ratio ³
3/31/2021	\$603,414	\$757,083	79.70%	72.31%
6/30/2021	\$617,664	\$771,123	80.10%	70.90%
9/30/2021	\$694,131	\$886,629	78.29%	69.43%
12/31/2021	\$760,859	\$857,117	88.77%	67.94%
3/31/2022	\$822,649	\$951,268	86.48%	71.43%
6/30/2022	\$863,596	\$971,524	88.89%	74.57%
9/30/2022	\$879,028	\$979,329	89.76%	76.77%
12/31/2022	\$917,872	\$976,807	93.97%	79.31%
3/31/2023	\$944,666	\$985,194	95.89%	79.80%
6/30/2023	\$950,093	\$999,368	95.07%	81.91%
9/30/2023	\$947,522	\$1,036,775	91.39%	82.03%
12/31/2023	\$1,008,119	\$1,064,435	94.71%	83.44%
3/31/2024	\$1,075,134	\$1,133,767	93.69%	82.96%

* Figures are from the US Metro 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 (<https://cdr.ffiec.gov/public/>).

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.



Section 9

Other Information

Section 9. Other Information

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

Home Mortgage Disclosure Act (HMDA)

** The Bank did not meet the loan-volume threshold (origination of at least 25 closed-end mortgage loans in each of the two preceding calendar years or origination of at least 500 open-end lines of credit secured by residential real estate in each of the two preceding calendar years) as defined under updated HMDA reporting requirements. As such, no HMDA data is included in the Bank's CRA Public File at this time.*

The Bank currently does not offer any residential mortgage products. Loans reported under Call Report Schedule RC-C Part 1 Items 1.c.1., 1.c.2.a., and 1.c.2.b. are commercial loans secured by 1-4 family residential properties. Again, origination of those loans as well as loans secured by multifamily (5+) residential properties reported under Call Report Schedule RC-C Part 1 Item 1.d. are minimal and do not meet yearly origination thresholds for reporting purposes.