Date of Evaluation: **JANUARY 14, 2019**

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Name of Depository Institution: **ASIAN BANK**

Institution's Identification Number: **2785477**

Address: **1023 RACE STREET, 2ND FLOOR**

PHILADELPHIA, PENNSYLVANIA

FEDERAL RESERVE BANK OF PHILADELPHIA TEN INDEPENDENCE MALL PHILADELPHIA, PENNSYLVANIA 19106

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INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING

INSTITUTION'S CRA RATING: OUTSTANDING

Summary of major factors supporting the bank's rating:

- The loan-to-deposit ratio is more than reasonable given the bank's size, financial condition, and assessment area credit needs;
- A majority of loans and other lending activities are in the bank's assessment area;
- The distribution of borrowers, given the demographics of the assessment area, reflects excellent penetration among businesses of different sizes and individuals of different income levels (including low- and moderate-income individuals); and
- The geographic distribution of loans reflects excellent dispersion throughout the assessment area.

SCOPE OF EXAMINATION

Asian Bank was rated satisfactory at its previous CRA evaluation dated August 11, 2014, which was conducted using the Interagency Small Institution CRA Examination Procedures adopted by the Board of Governors. The current evaluation of Asian Bank's CRA performance covers the period from August 12, 2014 through January 14, 2019, and also uses the Small Institution CRA Examination Procedures.

The CRA evaluation includes an analysis of:

- the loan-to-deposit ratio;
- the volume of loans extended inside and outside the bank's assessment area;
- the extent of lending to borrowers of different income levels, including low- and moderate-income borrowers and businesses of different sizes, including small businesses;
- the geographic distribution of lending within the assessment area, including lending in low- and moderate-income census tracts; and
- the bank's response to CRA-related complaints.

The loan products evaluated consisted of:

- A sample of 59 small business loans originated by the bank during calendar years 2017 and 2018; and
- Home-purchase, home-improvement and multifamily loans and the refinancing of such loans, collectively titled as Home Mortgage Disclosure Act (HMDA) loans, reported by the bank for calendar years 2014, 2015, 2016 and 2017.

Loan products were weighted according to loan volume. Due to the volume by number and by dollar amount, small business loans were given more weight in determining the bank's overall CRA performance. As of September 30, 2018, commercial loans comprised 75% of the bank's loan portfolio by dollar volume, while just under 25% of the portfolio was comprised of HMDA loans.

Asian Bank is a HMDA reporter, and therefore the bank's HMDA performance was compared to the aggregate of all lenders in the bank's assessment area reporting loans pursuant to the HMDA. At the time of the evaluation, aggregate HMDA data was available for comparison in all years included in this evaluation. As this evaluation spans four years, for purposes of evaluating the geographic distribution of loans, census tracts were classified on the basis of the 2010 U.S. Census data for loans made in 2014, 2015, and 2016, and on the basis of the updated 2015 American Community Survey (ACS) data for loans originated in 2017[1]. The distribution of HMDA loans to borrowers of different income levels was analyzed based upon annually-adjusted median family income data for each of those years, made available by the Federal Financial Institutions Examination Council (FFIEC). All other demographic indices and statistics presented throughout this evaluation are based on 2010 Census data for years 2014, 2015, and 2016, and on updated 2015 ACS data for 2017, unless otherwise noted.

Asian Bank does not report small business loans for purposes of the CRA, and therefore analysis of the bank's small business lending is based on a statistical sample of 59 commercial loans made in 2017 and 2018. For small business loans, examiners compared the bank's lending to Dun & Bradstreet data. Dun & Bradstreet collects and publishes data detailing the revenues and locations of local businesses. Because Asian Bank is not a small business reporter, it is not included in the ranking of aggregate lenders who report such loans in Philadelphia County. Consequently, the bank's performance was not directly compared to the lending of aggregate small business lenders. Conversely, aggregate lending data was considered for contextual purposes only.

Examiners analyzed the demographic characteristics of the bank's assessment area as one way to measure loan demand. Demographic information should not be construed as defining an expected level of lending for a particular loan product, group of borrowers, or geography. Rather, demographic data provides context for the bank's performance in the assessment area where it operates.

To supplement economic, demographic and performance data, examiners also conducted two community contacts within the bank's assessment area. Discussions were held with an economic development agency and a non-profit small business organization.

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[1]In accordance with a FFIEC policy decision, 2015 ACS data is not used to analyze loans originated in 2015 and 2016.

DESCRIPTION OF INSTITUTION

Asian Bank is state-chartered as a full-service commercial bank headquartered in Philadelphia, Pennsylvania. The institution offers a variety of commercial and consumer banking services, with a primary focus on small business lending. The bank is wholly-owned by Asian Financial Corporation, also located in Philadelphia. Asian Bank maintains two branch offices, one located in a middle-income census tract in the Chinatown section of Center City Philadelphia, and the second in a moderate-income census tract in Northeast Philadelphia. Both branches operate Monday through Friday, from 9 a.m. until 5 p.m., and have extended hours from 11 a.m. until 3 p.m. on Saturday and Sunday. Asian Bank is part of the STAR ATM network.

Asian Bank maintains a website which offers personal and business online banking services, as well as information on branch service hours and bank products. Product brochures and disclosures are offered in both English and Chinese, and branch staff speaks multiple languages, including English, Chinese, Vietnamese, and Korean. The bank places great importance on its ability to understand and service the Asian community. The bank officers and employees are involved in a number of community development projects, including partnership with the Philadelphia Chinatown Development Corporation.

According to the Consolidated Reports of Condition and Income (Call Report), as of September 30, 2018, Asian Bank reported $205 million in assets, of which $165 million, or 81%, were loans. On a dollar volume basis, commercial loans, which include commercial mortgages and commercial and industrial loans, were the most significant credit product offered by the bank and comprised 75% ($124 million) of the bank's loan portfolio. Residential real estate loans, which include open- and closed-end mortgages and multifamily loans, were the second largest segment of the bank's loan portfolio at $41 million, or 25%, of the bank's loan portfolio.

The composition of the bank's loan portfolio as of September 30, 2018 is presented in the following table.

LOANS as of 9/30/2018	$000	%
Construction & Land Development	131	< 1
Secured by Residential Properties (Open-end)	2,715	1.6
Secured by Residential Properties (Closed-end)	33,296	20.1
Multifamily Residential Properties	4,990	3.0
Commercial Mortgages	122,622	74.1
Commercial and Industrial Loans	1,636	< 1
Credit Cards	39	< 1
TOTAL	**$165,429**	**100.0%**

Schedule RC-C Part II (Loans to Small Farms and Small Businesses) of the Call Report provides data on the number and dollar amount of commercial loans that were small business loans made in original amounts of $1 million or less. This data is reported biannually, and at the time of the examination, the most recent data available was reported as of June 30, 2018. As seen in the table below, Schedule RC-C Part II indicates that 83% of Asian Bank's commercial loans were designated as loans to small businesses. Asian Bank reported no loans secured by farmland, loans to finance agricultural production, or other loans to farmers.

Asian Bank Commercial Loan Portfolio		
	Amount Outstanding As Of 6/30/2018 ($000)	Percent
Loans with original amounts of $100,000 or less	6,527	5.5
Loans with original amounts of more than $100,000 through $250,000	25,180	21.2
Loans with original amounts of more than $250,000 through $1,000,000	67,369	56.6
TOTAL SMALL BUSINESS LOANS	**99,076**	**83.3**
Loans with original amounts of more than $1,000,000	19,905	16.7
TOTAL COMMERCIAL LOANS	**118,981**	**100.0%**

The bank's asset size and financial condition indicate that it has the ability to effectively meet the credit needs of the assessment area. There are no legal or other impediments that would hamper the bank's ability to meet community credit needs.

DESCRIPTION OF ASSESSMENT AREA

For purposes of CRA, Asian Bank has designated its assessment area as Philadelphia County, which includes the city of Philadelphia. The assessment area is located within the Philadelphia Metropolitan Division (MD), which is part of the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Metropolitan Statistical Area (Philadelphia MSA). The bank's assessment area complies with the requirements of the CRA and does not arbitrarily exclude low- or moderate-income census tracts.

As mentioned previously, discussions were held with two community organizations (an economic development agency and a small business organization) to provide perspective on the credit needs of the assessment area. The most frequently mentioned credit need was access to small business credit in the city of Philadelphia, as many entrepreneurs are interested in starting businesses in Philadelphia. One community contact mentioned the need for financial literacy programs and homeownership counseling, and stressed the importance of preservation of affordable housing within the city of Philadelphia. Finally, it was noted that area small businesses may benefit from business-related assistance, as many potential entrants to the market struggle to create business plans, perform financial analysis, and ultimately obtain loans.

2010 Census Data

According to 2010 Census data, the bank's assessment area included 384 census tracts. Of these tracts, 61 (16%) were designated as low-income, 111 (29%) as moderate-income, 102 (27%) as middle-income, and 98 (26%) as upper-income. The bank's assessment area also contained 12 (3%) tracts classified as unknown-income. These tracts mainly consist of the Philadelphia International Airport, the Northeast Philadelphia Airport, Fairmount Park, and the Philadelphia Navy Yard. As of the 2010 Census, the assessment area's population measured just over 1.5 million, with 16% of the population living in low-income census tracts and 32% in moderate-income tracts.

2015 ACS Data

The results of the 2015 ACS caused changes in the tract designations in the bank's assessment area: 11 tracts changed from low- to moderate-income. Additionally, eight middle-income tracts changed to moderate-income, while five middle-income tracts changed to upper-income, and one to an unknown-income tract. According to 2015 ACS data, the bank's assessment area included 384 census tracts. Of these tracts, 50 (13%) were designated as low-income, 130 (34%) as moderate-income, 88 (23%) as middle-income, and 103 (27%) as upper-income. The bank's assessment area also contained 13 (3.4%) tracts classified as unknown-income. These tracts mainly consist of the Philadelphia International Airport, the Northeast Philadelphia Airport, Fairmount Park, and the Philadelphia Navy Yard. As of the 2015 ACS update, the assessment area's population experienced modest growth, and measured almost 1.6 million, with 14% of the population living in low-income census tracts and 36% in moderate-income tracts.

Maps of the Philadelphia assessment area, at both the 2010 Census and the 2015 ACS update, are available in Appendix D.

Asian Bank's CRA performance was evaluated in terms of the demographic and economic context in which the bank operates. According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2018[2], 38 depository institutions operated in Philadelphia County. These institutions maintained 292 branches, holding over $50 billion in deposits in the market. Asian Bank, with its two offices, held $153 million of those deposits, with a market share of less than 1%. Asian Bank ranked eighteenth overall, as the market was dominated by large nationwide and regional banks. Five banks held over 82% of the deposit market in Philadelphia: Wells Fargo Bank, N.A. (22%); Bank of America, N.A. (18%); Citizens Bank of Pennsylvania (18%); PNC Bank, N.A. (17%); and TD Bank, N.A. (8%).

Asian Bank's home-mortgage lending was compared to the aggregate of all lenders in the Philadelphia County assessment area reporting real estate loans pursuant to the HMDA. These data are reported annually, and 2017 is the most recent year for which aggregate data is available. In 2017, a total of 519 institutions reported 33,712 HMDA loan originations and purchases within the assessment area. Data show that Wells Fargo Bank, N.A. was the largest HMDA loan originator in the assessment area with almost 12% of all loan originations and purchases. Police and Fire Federal Credit Union ranked second with 7% of the market, and Trident Mortgage Company, LP ranked third with 3% of the market. Asian Bank ranked ninety-fourth with less than 1% of the market. Asian Bank originated 49 loans, and it is noteworthy that many national banks operating in the market purchased some of their loans within the assessment area. For example, of the 3,884 loans reported by Wells Fargo Bank, N.A., more than half (2,645 loans or 68%) were purchased from other lenders.

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[2]June 30, 2018 is the most recent date for which FDIC deposit data is available.

As Asian Bank is not a CRA small business reporter due to its asset size, information on the small business lending market share is presented for context only. In 2017, 118 small business lenders reported a total of 22,152 small business originations and purchases in the Philadelphia County assessment area. Large banks that offer credit cards were the market leaders, and no local banks ranked in the top ten small business lenders in the market. American Express Bank, FSB ranked first with 25% of the small business loan market, followed by PNC Bank, N.A. with just under 10%, and Capital One Bank USA, N.A. with 7% of the market.

ECONOMIC CHARACTERISTICS

Asian Bank's performance under the CRA was evaluated in terms of the demographic and business context in which the bank operates. As indicated previously, the bank's assessment area is the county of Philadelphia, which includes the city of Philadelphia. According to the September 2018 Moody's Analytics Precis Report for the entire Philadelphia MSA, strengths of the area include the fact that the city has a concentration of well-regarded, higher-education institutions, and is a center for healthcare and medical research. Philadelphia continues to become younger, promoting construction in the city's urban core and providing a major boost to the apartment market. On the other hand, weaknesses include the fact that the region suffers from weak population growth, an aging infrastructure, and prohibitive city taxes that push many businesses into the suburbs or neighboring states.

Philadelphia's economy is in expansion mode, and the metro division is outperforming the Commonwealth and region with job growth of 1.5%, according to Moody's Analytics. Steady job creation pushed the jobless rate below 5% for the first time in nearly 20 years. Healthcare remains an important economic driver, with the city's large healthcare institutions investing $3.9 billion over the next five years. A multitude of major projects for the downtown are also underway including the $1.5 Comcast Technology Center, which is nearing completion. Thirteen hotels are in the development pipeline and a strong tourism demand is expected to fuel economic development, though it expected to cool at some point. The city boasts a developed port and international airport which assists in promoting trade and tourism for the city. According to Moody's, demand for single family housing remains strong, which bodes well for future construction. Finally, a variety of multifamily projects are in the pipeline.

The largest private sector employers in Philadelphia are the University of Pennsylvania Health System, Thomas Jefferson University, Comcast, Drexel University and Aramark Corporation. Leading industries include: education and health services, which account for 31% of jobs in the Philadelphia MSA; government (13%); and leisure and hospitality services (10%).

Seasonally unadjusted unemployment rates for Philadelphia County, according to the U.S. Department of Labor's Bureau of Labor Statistics, are presented in the following table. Unemployment rates in Philadelphia County, the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA, the Commonwealth, and the country as whole, decreased during the evaluation period. However, the unemployment rates for Philadelphia County throughout the evaluation period have remained higher than the MSA, Commonwealth, and nation as a whole.

Asian Bank Unemployment Rates				
Geographical Area	**2014 Annual**	**2015 Annual**	**2016 Annual**	**2017 Annual**
Philadelphia County	8.1	7.1	6.8	6.2
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA	6.2	5.4	5.1	4.7
Pennsylvania	5.9	5.3	5.4	4.9
United States	6.2	5.3	4.9	4.4

Unemployment data is from the Bureau of Labor Statistics. Rates are not seasonally adjusted.

HOUSING

2010 Census Data

According to the 2010 Census data, the Philadelphia County assessment area contained 668,944 housing units, of which 48% were owner-occupied, 38% were rental, and 14% were vacant units. Census data for 2010 shows that 67% of the housing units in the Philadelphia County assessment area were single family units, while 15% were two-to-four family units, 18% were multifamily units, and less than 1% were mobile homes.

The amount of owner-occupied housing within designated census tracts is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to the 2010 Census, 11% of owner-occupied housing was located in the assessment area's low-income census tracts, and 29% in the moderate-income census tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (34% and 26%, respectively).

According to the 2010 Census, the median age of housing stock in the assessment area was 61 years, compared to 50 years in the Commonwealth of Pennsylvania. The median housing value in the assessment area was $135,219, which was lower than the median housing value for the Commonwealth overall ($159,300). The median housing values in the assessment area's low- and moderate-income census tracts ($60,129 and $89,193) were significantly lower than the median housing values in middle- and upper-income census tracts ($145,411 and $237,481, respectively).

The median gross rent (rent plus utilities) in the assessment area was $819 per month, which was notably higher than rent levels in the Commonwealth overall ($739). Further, the percentage of renters paying more than 30% of their income on rent was higher in the Philadelphia assessment area than in the Commonwealth as a whole (51% compared to 44%). Higher rents can be a burden, especially to low- and moderate-income renters, effectively diminishing their ability to save money for a down payment.

2015 ACS Data

According to the updated 2015 ACS data, the Philadelphia assessment area contained 670,229 housing units, of which 46% were owner-occupied, 41% were rental, and 13% were vacant. There were 87,496 housing units in the assessment area's low-income census tracts, of which 30,730 were owner-occupied, 41,162 were rental, and 15,604 were vacant. There were 239,526 housing units in the moderate-income tracts, of which 98,055 were owner-occupied, 101,531 were rental, and 39,940 were vacant.

According to the 2015 ACS for the assessment area, 67% of the housing units were single-family units, while 15% were two-to-four family units, 18% were multifamily units, and less than 1% were mobile homes.

The amount of owner-occupied housing within designated census tracts is used as a proxy to estimate demand for home-mortgage credit within such census tracts. According to the 2015 ACS, 10% of owner-occupied housing was located in the assessment area's low-income census tracts, and 32% in the moderate-income census tracts. Again, the majority of owner-occupied units were located in middle-income (28%) and upper-income tracts (30%).

According to the 2015 ACS data, the median age of housing stock in the assessment area remained at 61 years, compared to 54 years in the Commonwealth of Pennsylvania. The median housing value in the assessment area was $145,347, which was lower than the median housing value for the Commonwealth overall ($166,000). The median housing values in the assessment area's low- and moderate-income census tracts ($70,729 and $95,337) were again significantly lower than the median housing value in middle- and upper-income census tracts ($153,164 and $242,142, respectively).

The median gross rent in the assessment area remained notably higher than the rents in the Commonwealth as a whole ($922 per month compared to $840, respectively). Once again, the percentage of renters paying more than 30% of their income on rent was higher in the Philadelphia assessment area than in the Commonwealth (52% and 46%, respectively).

BORROWER INCOME DATA

2010 Census Data

The percentage of low- and moderate-income families is used as a proxy to estimate demand for home-mortgage lending in the assessment area. According to the 2010 Census, of the 311,376 families in the assessment area, 30% were designated as low-income, 18% were designated as moderate-income, 18% were middle-income, and 35% were upper-income. Families living below the poverty level represented 20% of families in the assessment area, which is considerably greater than that of the Commonwealth of Pennsylvania (9%).

2015 ACS Data

According to the updated 2015 ACS data, of the 309,568 families in the assessment area, 31% were designated as low-income, 18% were designated as moderate-income, 17% were middle-income, and 35% were upper-income. According to the 2015 ACS data, 21% of assessment area families were living below the poverty level, which is much higher than the statewide level of 9%.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes were classified based upon the Department of Housing and Urban Development's (HUD) annually-adjusted median family income data made available by the FFIEC for the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA. Median family incomes for 2014 through 2017 are listed in the table below, and are categorized by the dollar amounts recognized as low-, moderate, middle-, and upper-income.

Asian Bank Adjusted Median Family Income				
Year	HUD-Adjusted Median Family Income	Low Income (<50%)	Moderate Income (50% - less than 80%)	Middle Income (80% - less than 120%)	Upper Income (120% or Greater)
2014	$54,200	Less than $27,100	$27,100 - $43,359	$43,360 - $65,039	$65,040 or more
2015	$56,200	Less than $28,100	$28,100 - $44,959	$44,960 - $67,439	$67,440 or more
2016	$55,400	Less than $27,700	$27,700 - $44,319	$44,320 - $66,479	$66,480 or more
2017	$57,400	Less than $28,700	$28,700 - $45,919	$45,920 - $67,879	$67,880 or more

GEOGRAPHIC BUSINESS DATA

The percentage of businesses located within designated census tracts is used as a proxy to estimate demand for business credit within such census tracts. According to the Dun & Bradstreet business demographics, in 2017 there were 47,332 businesses in the assessment area. Of these businesses, 9% were located in low-income tracts, and 26% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (21% and 42%, respectively). Business demographic data also revealed that of the 47,332 businesses in the assessment area, 90% were small businesses (businesses with gross annual revenues of $1 million or less).

According to Dun & Bradstreet data for 2018, there were 57,021 businesses in the assessment area. Of these businesses, 9% were located in low-income tracts and 26% were located in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (21% and 41%, respectively). Business demographic data also revealed that of the 57,021 businesses in the assessment area, 92% were small businesses (businesses with gross annual revenues of $1 million or less).

The demographics used to assess the performance context in which Asian Bank operated are detailed in the tables on the following pages. As mentioned, 2010 U.S. Census data is used for comparison in 2014, 2015, and 2016, and updated 2015 ACS data is used for demographic comparison in 2017 and 2018[3].

Asian Bank Assessment Area Demographics 2014									
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	61	15.9	45,419	14.6	20,460	45.0	94,106	30.2
Moderate-income	111	28.9	100,984	32.4	26,666	26.4	54,703	17.6
Middle-income	102	26.6	95,214	30.6	11,272	11.8	54,867	17.6
Upper-income	98	25.5	69,684	22.4	3,737	5.4	107,700	34.6
Unknown-income	12	3.1	75	0.0	44	58.7	0	0.0
Total Assessment Area	**384**	**100.0**	**311,376**	**100.0**	**62,179**	**20.0**	**311,376**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**							
		Owner-occupied			**Rental**		**Vacant**		
	#	#	%	%	#	%	#	%
Low-income	101,423	34,981	11	34.5	45,886	45.2	20,556	20.3
Moderate-income	208,235	92,483	29.1	44.4	80,958	38.9	34,794	16.7
Middle-income	192,979	106,367	33.5	55.1	65,338	33.9	21,274	11.0
Upper-income	165,812	83,883	26.4	50.6	64,203	38.7	17,726	10.7
Unknown-income	495	41	0	8.3	348	70.3	106	21.4
Total Assessment Area	**668,944**	**317,755**	**100.0**	**47.5**	**256,733**	**38.4**	**94,456**	**14.1**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**							
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	6,125	11.2	5,252	10.9	480	12.7	393	14.0
Moderate-income	12,375	22.7	11,102	23.1	605	16.0	668	23.9
Middle-income	13,800	25.3	12,496	26.0	612	16.1	692	24.7
Upper-income	21,295	39.0	18,500	38.5	1,816	47.9	979	35.0
Unknown-income	991	1.8	645	1.3	279	7.4	67	2.4
Total Assessment Area	**54,586**	**100.0**	**47,995**	**100.0**	**3,792**	**100.0**	**2,799**	**100.0**
	Percentage of Total Businesses:		**87.9**		**6.9**			**5.1**

Based on 2010 Census information and 2014 Dun & Bradstreet data.

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[3]Only small business data was analyzed in 2018, as the sample of small business loans contained 2017 and 2018 originations. 2018 HMDA data was not included in the scope of this examination, as explained previously.

Asian Bank Assessment Area Demographics 2015								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	61	15.9	45,419	14.6	20,460	45.0	94,106	30.2
Moderate-income	111	28.9	100,984	32.4	26,666	26.4	54,703	17.6
Middle-income	102	26.6	95,214	30.6	11,272	11.8	54,867	17.6
Upper-income	98	25.5	69,684	22.4	3,737	5.4	107,700	34.6
Unknown-income	12	3.1	75	0.0	44	58.7	0	0.0
Total Assessment Area	**384**	**100.0**	**311,376**	**100.0**	**62,179**	**20.0**	**311,376**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	101,423	34,981	11.0	34.5	45,886	45.2	20,556	20.3
Moderate-income	208,235	92,483	29.1	44.4	80,958	38.9	34,794	16.7
Middle-income	192,979	106,367	33.5	55.1	65,338	33.9	21,274	11.0
Upper-income	165,812	83,883	26.4	50.6	64,203	38.7	17,726	10.7
Unknown-income	495	41	0.0	8.3	348	70.3	106	21.4
Total Assessment Area	**668,944**	**317,755**	**100.0**	**47.5**	**256,733**	**38.4**	**94,456**	**14.1**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	6,658	11.4	6,087	11.3	557	12.5	14	11.2
Moderate-income	13,343	22.8	12,653	23.5	669	15.1	21	16.8
Middle-income	14,773	25.3	14,008	26.0	728	16.4	37	29.6
Upper-income	22,590	38.6	20,385	37.8	2,155	48.5	50	40.0
Unknown-income	1,098	1.9	761	1.4	334	7.5	3	2.4
Total Assessment Area	**58,462**	**100.0**	**53,894**	**100.0**	**4,443**	**100.0**	**125**	**100.0**
	Percentage of Total Businesses:		**92.2**		**7.6**		**0.2**	

Based on 2010 Census information and 2015 Dun & Bradstreet data.

Asian Bank Assessment Area Demographics 2016								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	61	15.9	45,419	14.6	20,460	45.0	94,106	30.2
Moderate-income	111	28.9	100,984	32.4	26,666	26.4	54,703	17.6
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Upper-income	98	25.5	69,684	22.4	3,737	5.4	107,700	34.6
Unknown-income	12	3.1	75	0.0	44	58.7	0	0.0
Total Assessment Area	**384**	**100.0**	**311,376**	**100.0**	**62,179**	**20.0**	**311,376**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	101,423	34,981	11.0	34.5	45,886	45.2	20,556	20.3
Moderate-income	208,235	92,483	29.1	44.4	80,958	38.9	34,794	16.7
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Upper-income	165,812	83,883	26.4	50.6	64,203	38.7	17,726	10.7
Unknown-income	495	41	0.0	8.3	348	70.3	106	21.4
Total Assessment Area	**668,944**	**317,755**	**100.0**	**47.5**	**256,733**	**38.4**	**94,456**	**14.1**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	5,971	11.2	5,390	11.1	552	12.4	29	10.7
Moderate-income	12,061	22.6	11,335	23.3	674	15.1	52	19.2
Middle-income	13,447	25.2	12,645	26.0	732	16.4	70	25.8
Upper-income	20,825	39.1	18,547	38.2	2,168	48.6	110	40.6
Unknown-income	1,016	1.9	670	1.4	336	7.5	10	3.7
Total Assessment Area	**53,320**	**100.0**	**48,587**	**100.0**	**4,462**	**100.0**	**271**	**100.0**
	Percentage of Total Businesses:		**91.1**		**8.4**		**0.5**	

Based on 2010 Census information and 2016 Dun & Bradstreet data.

Asian Bank Assessment Area Demographics 2017								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low - income	50	13.0	42,212	13.6	19,643	46.5	94,740	30.6
Moderate-income	130	33.9	110,550	35.7	30,051	27.2	55,003	17.8
Middle-income	88	22.9	81,080	26.2	11,221	13.8	51,224	16.5
Upper-income	103	26.8	75,168	24.3	4,102	5.5	108,601	35.1
Unknown-income	13	3.4	558	0.2	120	21.5	0	0.0
Total Assessment Area	**384**	**100.0**	**309,568**	**100.0**	**65,137**	**21.0**	**309,568**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	87,496	30,730	10.0	35.1	41,162	47.0	15,604	17.8
Moderate-income	239,526	98,055	32.1	40.9	101,531	42.4	39,940	16.7
Middle-income	164,218	86,583	28.3	52.7	60,633	36.9	17,002	10.4
Upper-income	176,419	90,448	29.6	51.3	69,578	39.4	16,393	9.3
Unknown-income	2,570	68	0.0	2.6	2,262	88.0	240	9.3
Total Assessment Area	**670,229**	**305,884**	**100.0**	**45.6**	**275,166**	**41.1**	**89,179**	**13.3**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	4,210	8.9	3,827	8.9	375	8.6	8	5.5
Moderate-income	12,274	25.9	11,455	26.8	797	18.2	22	15.1
Middle-income	10,071	21.3	9,496	22.2	549	12.5	26	17.8
Upper-income	19,734	41.7	17,303	40.4	2,346	53.6	85	58.2
Unknown-income	1,033	2.2	716	1.7	312	7.1	5	3.4
Total Assessment Area	**47,322**	**100.0**	**42,797**	**100.0**	**4,379**	**100.0**	**146**	**100.0**
	Percentage of Total Businesses:		**90.4**		**9.3**		**0.3**	

Based on 2015 ACS information and 2017 Dun & Bradstreet data.

Asian Bank Assessment Area Demographics 2018								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low - income	50	13.0	42,212	13.6	19,643	46.5	94,740	30.6
Moderate-income	130	33.9	110,550	35.7	30,051	27.2	55,003	17.8
Middle-income	88	22.9	81,080	26.2	11,221	13.8	51,224	16.5
Upper-income	103	26.8	75,168	24.3	4,102	5.5	108,601	35.1
Unknown-income	13	3.4	558	0.2	120	21.5	0	0.0
Total Assessment Area	**384**	**100.0**	**309,568**	**100.0**	**65,137**	**21.0**	**309,568**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
	#	#	%	%	#	%	#	%
Low-income	87,496	30,730	10.0	35.1	41,162	47.0	15,604	17.8
Moderate-income	239,526	98,055	32.1	40.9	101,531	42.4	39,940	16.7
Middle-income	164,218	86,583	28.3	52.7	60,633	36.9	17,002	10.4
Upper-income	176,419	90,448	29.6	51.3	69,578	39.4	16,393	9.3
Unknown-income	2,570	68	0.0	2.6	2,262	88.0	240	9.3
Total Assessment Area	**670,229**	**305,884**	**100.0**	**45.6**	**275,166**	**41.1**	**89,179**	**13.3**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	5,045	8.8	4,645	8.9	379	8.6	21	6.9
Moderate-income	15,028	26.4	14,153	27.1	805	18.2	70	23.0
Middle-income	12,087	21.2	11,485	22.0	547	12.4	55	18.0
Upper-income	23,635	41.4	21,127	40.4	2,359	53.4	149	48.9
Unknown-income	1,226	2.2	886	1.7	330	7.5	10	3.3
Total Assessment Area	**57,021**	**100.0**	**52,296**	**100.0**	**4,420**	**100.0**	**305**	**100.0**
	Percentage of Total Businesses:		**91.7**		**7.8**		**.5**	

Based on 2015 ACS information and 2018 Dun & Bradstreet data.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LOAN-TO-DEPOSIT RATIO

Asian Bank's loan-to-deposit ratio is more than reasonable, given the bank's asset size, financial condition and assessment area credit needs. During the evaluation period, the bank's loan-to-deposit ratio averaged almost 98%. This ratio is above the peer group ratio[4] of 79%, and above the bank's average ratio at the previous CRA evaluation (81%).

A financial institution's loan-to-deposit ratio compares the institution's aggregate loan balances outstanding to its total deposits outstanding. The ratio is a measure of an institution's lending volume relative to its capacity to lend and is derived by adding the quarterly loan-to-deposit ratios for a given period and dividing the total by the number of quarters within the period.

As seen in the table on the following page, the bank's loan-to-deposit ratio trended upward during most of the evaluation period and exceeded 100% in recent quarters. In absolute terms, the bank's net loan volume has increased 108% over the evaluation period, from $78 million as of September 30, 2014 to $163 million as of September 30, 2018. During the same time period, deposits have increased by 85%, from $85 million to $157 million.

The following table shows Asian Bank's quarterly loan-to-deposit ratio for the 17-quarter period since the previous CRA evaluation, together with the average ratio for the same period.

Asian Bank Historical Loan-to-Deposit Ratios			
As of Date	**Net Loans (Thousands)**	**Total Deposits (Thousands)**	**LTD Ratios (%)**
09/30/2018	163,354	157,176	103.9
06/30/2018	156,947	153,271	102.4
03/31/2018	149,897	148,005	101.3
12/31/2017	143,730	141,750	101.4
09/30/2017	141,755	138,202	102.6
06/30/2017	133,988	131,473	101.9
03/31/2017	127,360	128,683	99.0
12/31/2016	122,723	133,116	92.2
09/30/2016	118,847	126,627	93.9
06/30/2016	111,618	123,316	90.5
03/31/2016	108,929	109,781	99.2
12/31/2015	100,855	103,904	97.1
09/30/2015	93,845	100,503	93.4
06/30/2015	90,757	91,692	99.0
03/31/2015	83,223	86,921	95.8
12/31/2014	79,475	86,200	92.2
09/30/2014	78,230	84,972	92.1
Quarterly Loan to Deposit Ratio Average Since Previous Evaluation			97.5

Source: Uniform Bank Performance Report (UBPR)

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[4] Asian Bank's national peer group includes commercial banks with assets between $100 million and $300 million, with three or more full-service banking offices, located in a metropolitan statistical area.

ASSESSMENT AREA CONCENTRATION

A majority of Asian Bank's loans and other lending-related activities are in the assessment area.

Asian Bank's small business and home-mortgage lending was analyzed to determine the volume of loans extended inside and outside of the bank's assessment area as delineated for purposes of the CRA. During the evaluation period, nearly 80% of small business loans by number were extended within the bank's assessment area, while nearly 85% of small business loans sampled by dollar amount were extended in the bank's assessment area.

With respect to home-mortgage loans, 83% of the HMDA loans by number, and 86% of the HMDA loans by dollar amount were extended in the bank's assessment area.

The following table on the shows the distribution of lending inside and outside of the bank's assessment area, indicating that a majority of loans are inside the bank's assessment area.

Asian Bank Lending Inside and Outside the Assessment Area								
Loan Types	Inside				Outside			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Improvement	9	100.0	$2,000	100.0	0	0.0	$0	0.0
Home Purchase - Conventional	90	78.9	$22,769	80.6	24	21.1	$5,467	19.4
Multi-Family Housing	16	88.9	$11,708	91.8	2	11.1	$1,048	8.2
Refinancing	36	90.0	$12,241	88.0	4	10.0	$1,669	12.0
Total HMDA related	**151**	**83.4**	**$48,718**	**85.6**	**30**	**16.6**	**$8,184**	**14.4**
Small Business	47	79.7	$17,062	84.9	12	20.3	$3,044	15.1
Total Small Business Related	**47**	**79.7**	**$17,062**	**84.9**	**12**	**20.3**	**$3,044**	**15.1**

DISTRIBUTION OF LOANS BY REVENUE SIZE OF BUSINESS AND BORROWER INCOME LEVEL

As mentioned previously, Asian Bank does not originate a substantial volume of residential mortgages. Accordingly, small business loans were weighted more heavily than HMDA loans in the borrower distribution analysis.

Given the assessment area's demographic and economic characteristics, the distribution of borrowers reflects excellent penetration among businesses of different sizes, including small businesses, and individuals of different income levels, including low- and moderate-income individuals.

Small Business Lending

The bank's distribution of loans to businesses reflects excellent penetration among business customers of different sizes, including small businesses.

For purposes of this evaluation, a small business loan is defined as a commercial loan with an origination amount of $1 million or less. Small business loans are further analyzed to identify those loans to businesses with gross annual revenues of $1 million or less, namely small businesses.

The number of businesses operating in the bank's assessment area is used as a proxy to estimate demand for business credit in that assessment area. According to available Dun & Bradstreet business demographic data, in 2017 there were 47,332 businesses in the assessment area, with 42,797 (90%) designated as small businesses.

In 2018, there were 57,021 businesses in the assessment area, 52,296 (92%) of which were small businesses.

As mentioned previously, the performance evaluation measures Asian Bank's small business lending performance using a sample of 59 of the bank's small business loans from the calendar years 2017 and 2018[5].

2015 ACS Data

In 2017, Asian Bank originated 31 small business loans, aggregating $8.5 million within the assessment area, all of which (100%) were originated to small businesses. This performance was well above the aggregate lending level of 49% to small businesses, and also exceeded the proxy of 90%.

Small business loans were further analyzed to determine the extent of loans originated in an amount of $100 thousand or less. Smaller size loans are generally commensurate with the borrowing needs of smaller businesses, and thus added weight is given to such loans in determining whether an institution is meeting the credit needs of small businesses.

In 2017, 19% of Asian Bank's small business loans were extended in amounts of $100 thousand or less. Aggregate data indicates that 94% of small business loans made in the assessment area were originated in an amount of $100 thousand or less.

In 2018, Asian Bank originated 16 small business loans, aggregating $8.6 million within the assessment area. Of these loans, 100% were originated to small businesses, and 6% of loans were extended in amounts of $100 thousand or less. Aggregate lending levels for 2018 were not available for comparison at the time of the evaluation, but the bank's performance once again exceeded the proxy of 92%.

Home-Mortgage Lending

Asian Bank's distribution of home-mortgage loans among borrowers of different income levels, including low- and moderate-income borrowers, is reasonable. Over the evaluation period, Asian Bank originated 151 home-mortgage loans in its assessment area, totaling nearly $49 million[6].

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[5] The information used to evaluate small business lending activity is detailed in the Loan Distribution Tables contained in Appendix B.

[6] The evaluation includes Asian Bank's HMDA loans originated during calendar years 2014, 2015, 2016 and 2017. The information used to evaluate HMDA lending activity is detailed in the Loan Distribution Tables contained in Appendix C.

For purposes of evaluating the distribution of loans to borrowers of different income levels, incomes are classified based upon annually-adjusted median family income data. Further, the respective percentages of low-, moderate-, middle- and upper-income families in the assessment area are used as proxies to estimate demand for home-mortgage credit. As noted previously, according to the 2010 Census data, approximately 30% of assessment area families were low-income, 18% were moderate-income, 18% were middle-income, and 35% were upper-income. Similarly, according to the updated 2015 ACS data, 31% of assessment area families were low-income, 18% were moderate-income, 17% were middle-income, and 35% were upper-income.

Generally, the higher the percentage of low- and moderate-income families in the assessment area, the greater the demand for home-mortgage credit is among low- and moderate-income families and individuals within the assessment area. According to available data, just under half of the families in the assessment area (48% using 2010 Census data, and 49% using 2015 ACS data) were designated as low- or moderate-income families, indicating a significant need for home-mortgage credit among this segment of the population.

The following tables compare Asian Bank's home-mortgage lending to aggregate lending levels, using the percentages of low- and moderate-income families in the assessment area as proxies for loan demand. The first table, used to evaluate lending in 2014, 2015 and 2016, relies on 2010 Census data to estimate demand for home-mortgage credit among low- and moderate-income families. The second table, used to evaluate 2017 lending relies on updated 2015 ACS data to estimate demand for home-mortgage credit among low- and moderate-income families.

Asian Bank Distribution of Loans by Borrower Income Level (2014-2016)							
		Aggregate Comparison					
	% Families by Family Income (2010 Census Data)	2014		2015		2016	
Income Level		% Asian Bank Lending	% Aggregate Lending	% Asian Bank Lending	% Aggregate Lending	% Asian Bank Lending	% Aggregate Lending
Low	30.2	22.5	6.8	15.4	6.5	30.6	5.6
Moderate	17.6	5.0	13.8	7.7	12.9	13.9	12.8
Middle	17.6	7.5	18.8	3.8	18.0	13.9	17.4
Upper	34.6	12.5	39.6	19.2	39.3	5.6	42.8
Unknown	0.0	52.5	21.0	53.8	23.5	36.1	21.3
Total	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

Asian Bank Distribution of Loans by Borrower Income Level (2017)			
		Aggregate Comparison	
Income Level	% Families by Family Income (2015 ACS Data)	% Asian Bank Lending	% Aggregate Lending
Low	30.6	22.4	6.4
Moderate	17.8	10.2	13.3
Middle	16.5	16.3	18.0
Upper	35.1	6.1	44.1
Unknown	0.0	44.9	18.3
Total	**100%**	**100%**	**100%**

Lending to Low-Income Borrowers

For the period under review, Asian Bank's HMDA lending to low-income borrowers was reasonable.

2010 Census Data

According to the 2010 Census, approximately 30% of the families in the assessment area were low-income. In assessing the level of the bank's lending among low-income borrowers, the evaluation takes into consideration that the home-mortgage credit needs of such individuals and families can be a challenge to address through conventional loan products, presenting a significant obstacle to homeownership.

Asian Bank's lending in 2014 to low-income borrowers was reasonable. In 2014, 23% of the bank's HMDA loans were to low-income borrowers in the assessment area, which was greater than the aggregate lending level of 7%, although both the bank and aggregate lending levels were below the proxy of 30% of low-income families, suggesting that lending opportunities are somewhat limited with low-income borrowers for all banks in the assessment area, and that conventional products may not meet the credit needs of low-income borrowers. Asian Bank originated 28% of its home-purchase loans (7 loans), 20% of refinance loans (2 loans), and no home-improvement or multifamily loans to low-income borrowers in 2014. Aggregate 2014 lending data show that 7% of home-purchase loans, 6% of refinance loans, and 13% of home-improvement loans were made to low-income borrowers No multifamily loans to low-income borrowers were made by aggregate lenders in 2014.

Asian Bank's lending in 2015 to low-income borrowers was reasonable. In 2015, 15% of the bank's HMDA loans were to low-income borrowers in the assessment area, which was greater than the aggregate lending level of 7%, although both the bank and aggregate lending levels were substantially below the proxy of 30% of low-income families. In 2015, Asian Bank originated 11% of its home-purchase loans (1 loan), and 30% of refinance loans (3 loans) to low-income borrowers. The bank made no home-improvement or multifamily loans to low-income borrowers in 2015. By comparison, aggregate lenders made 7% of home-purchase loans, 5% of refinance loans, 11% of home-improvement loans, and no multifamily loans to low-income borrowers in 2015.

Asian Bank's lending in 2016 to low-income borrowers was excellent. In 2016, almost 31% of the bank's HMDA loans were to low-income borrowers in the assessment area, which far exceeded the aggregate lending level of 6% and just surpassed the proxy of 30% of low-income families. Asian Bank originated 39% of its home-purchase loans (9 loans), 11% of refinance loans (1 loan), 100% of home-improvement loans (1 loan), and no multifamily loans to low-income borrowers. 2016 aggregate lending data shows that 6% of home-purchase loans, 4% of refinance loans, 9% of home-improvement loans, and no multifamily loans were made to low-income borrowers.

2015 ACS Data

Asian Bank's lending in 2017 to low-income borrowers was reasonable.

According to the 2015 ACS data, approximately 31% of the families in the assessment area were low-income. The bank's lending to low-income borrowers decreased to 22%, but was still well above that of the aggregate lending level of 6%. Asian Bank's lending was below the proxy of 31% of low-income families. Asian Bank originated 30% of its home-purchase loans (10 loans), and 25% of home-improvement loans (1 loan) to low-income borrowers. The bank made no refinance or multifamily loans to low-income borrowers in 2017. Aggregate 2017 lending data shows that 7% of home-purchase loans, 6% of refinance loans, and 11% of home-improvement loans, and no multifamily loans were made to low-income borrowers.

Lending to Moderate-Income Borrowers

For the period under review, the bank's lending to moderate-income borrowers was reasonable.

2010 Census Data

Asian Bank's lending in 2014 to moderate-income borrowers was poor. In 2014, 5% of the bank's HMDA loans were to moderate-income borrowers in the assessment area, which was below the aggregate lending level of 14% and the proxy of 18% of moderate-income families. Asian Bank originated 8% of its home-purchase loans (2 loans), and no refinance, home-improvement or multifamily loans to moderate-income borrowers in 2014. Aggregate lending data shows that 15% of home-purchase loans, 12% of refinance loans, 17% of home-improvement loans and no multifamily loans were made to moderate-income borrowers in 2014.

Asian Bank's lending in 2015 to moderate-income borrowers was poor. In 2015, 8% of the bank's HMDA loans were to moderate-income borrowers in the assessment area, which was below the aggregate lending level of 13%, and the proxy of 18% of moderate-income families. Asian Bank originated 11% of its home-purchase loans (1 loan), and 10% of refinance loans (1 loan) to moderate-income borrowers. No home-improvement or multifamily loans were made to moderate-income borrowers in 2015. Aggregate lending data shows that 15% of home-purchase loans, 10% of refinance loans, 17% of home-improvement loans, and no multifamily loans were made to moderate-income borrowers in 2015.

Asian Bank's HMDA lending in 2016 to moderate-income borrowers was reasonable. In 2016, 14% of the bank's HMDA loans were to moderate-income borrowers in the assessment area, which was just above the aggregate lending level of 13%, but below the proxy of 18% of moderate-income families. Asian Bank originated 13% of its home-purchase loans (3 loans) and 22% of refinance loans (2 loans) to moderate-income borrowers. No home-improvement or multifamily loans were made to moderate-income borrowers in 2016. Aggregate lenders made 16% of home-purchase loans, 8% of refinance loans, 16% of home-improvement loans, and no multifamily loans to moderate-income borrowers in 2016.

2015 ACS Data

Asian Bank's lending in 2017 to moderate-income borrowers was reasonable.

According to 2015 ACS data, 18% of families within the assessment area were categorized as moderate-income. In total, 10% of the bank's HMDA loans were originated to moderate-income borrowers, as compared to the aggregate lending level of 13% and proxy of 18%. Of note is the fact that Asian Bank's loan volume to moderate-income borrowers increased in 2016, and again in 2017. By product type, Asian Bank originated 12% of its home-purchase loans (4 loans), 14% of its refinance loans (1 loan), and no home-improvement or multifamily loans to moderate-income borrowers in 2017. In comparison, aggregate lenders originated 15% of home-purchase loans, 10% of refinance loans, 16% of home-improvement loans, and no multifamily loans to moderate-income borrowers in 2017.

GEOGRAPHIC DISTRIBUTION OF LENDING

The geographic distribution of loans was analyzed to determine the dispersion of loans among different census tracts within the assessment area. The overall analysis reflects excellent dispersion throughout the assessment area, including low- and moderate-income tracts.

Small Business Lending

The geographic distribution of Asian Bank's small business loans reflects excellent dispersion throughout the assessment area, in the context of the assessment area's demographic and economic characteristics, during the evaluation period.

2015 ACS Data

The geographic distribution of businesses in the assessment area by census tract type is used as a proxy for small business loan demand. Generally, the greater the number of businesses located in a tract, the greater the demand for business loans in the tract. Based on available 2017 business demographics, 9% of businesses were located in low-income census tracts, and 26% were in moderate-income tracts. The majority of businesses were located in middle- and upper-income tracts (21% and 42%, respectively). The geographic location of businesses in 2018 mirrored the 2017 statistics, according to Dun & Bradstreet data.

The table below presents the geographic distribution of Asian Bank's sample of small business loans in comparison to the applicable business proxies and the aggregate lending levels for 2017. Aggregate lending levels for 2018 were not available for comparison at the time of the evaluation.

| | | | Aggregate Comparison | | | |
| | | | 2017 | | 2018 | |
Income Level	% Businesses By Income Tract Level (2015 ACS Data)	% Businesses By Income Tract Level (2018)	% Asian Bank Lending	% Aggregate Lending	% Asian Bank Lending	% Aggregate Lending
Low	8.9	8.8	19.4	8.5	6.3	NA
Moderate	25.9	26.4	29.0	23.1	31.3	NA
Middle	21.3	21.2	41.9	20.9	43.8	NA
Upper	41.7	41.4	9.7	45.1	18.8	NA
Unknown	2.2	2.2	0.0	2.1	0.0	NA
Total	**100%**	**100%**	**100%**	**100%**	**100%**	**NA**

Asian Bank — Geographic Distribution of Small Business Loans

Lending in Low-Income Census Tracts

Asian Bank's small business lending in low-income tracts is excellent.

In 2017, the geographic distribution of small business loans was excellent. Loan analysis for 2017 shows that Asian Bank originated 19% of small business loans in the assessment area's low-income census tracts, compared to the applicable proxy of 9% of businesses in low-income tracts, and aggregate lending of 9% of small business loans in low-income tracts.

Geographic lending distribution dropped in 2018, and was considered to be reasonable. In 2018, Asian Bank originated 6% of small business loans in the assessment area's low-income census tracts, compared to the applicable proxy of 9% of businesses in moderate-income tracts. No comparative analysis with the aggregate lending levels was conducted, as data was unavailable at the time of the evaluation.

Lending in Moderate-Income Census Tracts

Asian Bank's small business lending in moderate-income tracts is excellent.

In 2017, Asian Bank's lending in moderate-income tracts was excellent. The bank originated 29% of its small business loans in the assessment area's moderate-income tracts. The bank's 2017 lending level in moderate-income tracts outperformed both the aggregate lending level (23%) and the business proxy of 26%.

The bank's small business lending in 2018 was also excellent. In 2018, Asian Bank originated 31% of small business loans in moderate-income census tracts, which was above Asian's Bank's lending level in 2017. The bank's lending exceeded the business proxy of 26%. Aggregate lending levels were not available for comparison at the time of the evaluation.

Home-Mortgage Lending

Asian Bank's geographic distribution of home-mortgage loans reflects excellent dispersion throughout the assessment area, taking into consideration the bank's business strategy and the assessment area's demographics and economic characteristics.

As previously noted, the percentage of owner-occupied housing units contained within designated census tracts is used as a proxy to estimate demand for residential mortgage credit within such tracts. Generally, the greater the number of owner-occupied residential dwellings in a census tract, the greater the demand for home-mortgage credit in the tract will be.

According to 2010 Census data, 11% of the assessment area's owner-occupied housing stock was located in low-income census tracts, and 29% was located in moderate-income tracts. The majority of owner-occupied housing was located in middle- and upper-income tracts (34% and 26%, respectively).

Likewise, according to 2015 ACS data, 10% of the owner-occupied housing stock was located in low-income census tracts, and 32% was located in moderate-income tracts. Again, the majority of owner-occupied units were located in middle- and upper-income tracts (28% and 30%, respectively).

The following tables present Asian Bank's HMDA lending distribution from 2014 through 2017, in comparison to the applicable owner-occupied housing proxies and the aggregate lending levels in the assessment area. The first table, used for lending in 2014, 2015 and 2016, relies on 2010 Census data, while the second table, used for 2017 lending, relies on updated 2015 ACS data.

		Asian Bank Geographic Distribution of HMDA Loans (2014-2016)					
	% Owner-Occupied Units (2010 Census)	Aggregate Comparison					
		2014		2015		2016	
Income Level		% Asian Bank Lending	% Aggregate Lending	% Asian Bank Lending	% Aggregate Lending	% Asian Bank Lending	% Aggregate Lending
Low	11.0	2.5	6.4	3.8	6.0	5.6	6.3
Moderate	29.1	50.0	23.5	50.0	23.2	22.2	23.6
Middle	33.5	27.5	35.5	30.8	35.4	50.0	34.8
Upper	26.4	20.0	34.5	15.4	35.3	22.2	35.2
Unknown	0.0	0.0	0.2	0.0	0.1	0.0	0.2
Total	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**	**100%**

		Asian Bank Geographic Distribution of HMDA Loans (2017)	
Income Level	% Owner-Occupied (2015 ACS)	Aggregate Comparison	
		% Asian Bank Lending	% Aggregate Lending
Low	10.0	18.4	5.5
Moderate	32.1	36.7	28.6
Middle	28.3	34.7	29.6
Upper	29.6	10.2	36.3
Unknown	0.0	0.0	0.1
Total	**100%**	**100%**	**100%**

Lending in Low-Income Census Tracts

Asian Bank's overall HMDA lending in low-income tracts is reasonable.

2010 Census Data

Asian Bank's lending in low-income census tracts in 2014 was poor. Asian Bank originated 3% of HMDA loans in low-income tracts in 2014, which was below both the proxy of 11%, and the aggregate lending level of 6%. Categorized by loan product type, Asian Bank made 4% of its home-purchase loans (1 loan) in a low-income tract. The bank made no refinance, home-improvement, or multifamily loans in low-income tracts in 2014. Aggregate 2014 lending data show that 6% of home-purchase loans, 5% of refinance loans, 11% of home-improvement loans, and 9% of multifamily loans were made in low-income tracts in the assessment area.

Asian Bank's lending in low-income census tracts in 2015 was poor. In 2015, Asian Bank's HMDA lending in low-income tracts was 4% of its loans, which was below the proxy of 11% of owner-occupied housing and aggregate lending of 6%. Categorized by loan product type, Asian Bank made 11% of its home-purchase loans (1 loan) in a low-income tract. The bank made no refinance, home-improvement, or multifamily loans in low-income tracts in 2015. Aggregate lending data show that 6% of home-purchase loans, 5% of refinance loans, 10% of home-improvement, and 9% of multifamily loans were made in low-income tracts in the assessment area in 2015.

Asian Bank's lending in low-income census tracts in 2016 was reasonable. In 2016, Asian Bank's HMDA lending in low-income tracts was 6%, which was below the proxy of 11% of owner-occupied housing, but on par with aggregate lending of 6%. Categorized by loan product type, Asian Bank made 4% of its home-purchase loans (1 loan) and 100% of its home-improvement loans (1 loan) in low-income tracts. The bank made no refinance or multifamily loans in low-income tracts in 2016. Aggregate 2016 lending data shows that 7% of home-purchase loans, 5% of refinance loans, 11% of home-improvement loans, and 12% of multifamily loans were made in low-income tracts in the assessment area.

2015 ACS Data

Asian Bank's lending in low-income census tracts in 2017 was excellent. Asian Bank's HMDA lending in low-income tracts was 18%, far exceeding aggregate lending of 6% and proxy of 10%. Categorized by loan product type, Asian Bank made 15% of its home purchase loans (5 loans) in low-income tracts. The bank made 43% of refinance loans (3 loans), 25% of home improvement loans (1 loan), and no multifamily loans in low-income tracts in 2017. Aggregate 2017 lending data shows that 6% of home purchase loans, 5% of refinance loans, 9% of home improvement loans, and 7% of multifamily loans were made in low-income tracts in the assessment area.

Lending in Moderate-Income Census Tracts

Based on assessment area demographics, there were greater HMDA lending opportunities in moderate-income census tracts, compared to low-income tracts. Asian Bank's overall HMDA lending in moderate-income tracts was considered excellent.

2010 Census Data

Asian Bank's lending in moderate-income census tracts in 2014 was excellent. Asian Bank originated 50% of home-mortgage loans in moderate-income tracts in 2014, which was well above both the proxy of 29%, and the aggregate lending level of 24%. Categorized by loan product type, Asian Bank made 44% of its home-purchase loans (11 loans), 70% of refinance loans (7 loans), 100% of home-improvement loans (1 loan), and 25% of multifamily loans (1 loan) in moderate-income tracts in 2014. Aggregate 2014 lending data shows that 24% of home-purchase loans, 23% of refinance loans, 27% of home-improvement loans, and 18% of multifamily loans were made in moderate-income tracts in the assessment area.

Asian Bank's lending in moderate-income census tracts in 2015 was excellent. In 2015, 50% of Asian Bank's loans were made in moderate-income tracts, which was again well above the proxy of 29%, and aggregate lending levels of 23%. Categorized by loan product type, Asian Bank made 44% of its home-purchase loans (4 loans),50% of refinance loans (5 loans), 33% of home-improvement loans (1 loan), and 75% of multifamily loans (3 loans) in moderate-income tracts in 2015. Aggregate lending data shows that 25% of home-purchase loans, 20% of refinance loans, 26% of home-improvement loans, and 23% of multifamily loans were made in moderate-income tracts in the assessment area.

Asian Bank's lending in moderate-income census tracts in 2016 was reasonable. In 2016, Asian Bank's HMDA lending in moderate-income tracts was 22%, which measured below the proxy of 29% of owner-occupied housing in moderate-income tracts, but approximated aggregate performance of 24%. Categorized by loan product type, Asian Bank made 26% of its home-purchase loans (6 loans), 22% of refinance loans (2 loans), and no home-improvement or multifamily loans in moderate-income tracts in 2016. Aggregate lending data shows that 25% of home-purchase loans, 20% of refinance loans, 27% of home-improvement loans, and 24% of multifamily loans were made in moderate-income tracts in the assessment area in 2016.

2015 ACS Data

Asian Bank's lending in moderate-income census tracts in 2017 was excellent. Asian Bank's HMDA lending in moderate-income tracts was 37%, which exceeded aggregate lending of 29%, and the proxy of 32%. Categorized by loan product type, Asian Bank made 42% of its home-purchase loans (14 loans), 14% of refinance loans (1 loan), 50% of home-improvement loans (2 loans), and 20% of multifamily loans (1 loan) in moderate-income tracts in 2017. Aggregate lending data shows that 30% of home-purchase loans, 25% of refinance loans, 33% of home-improvement loans, and 36% of multifamily loans were in moderate-income tracts in the assessment area in 2017.

RESPONSE TO SUBSTANTIATED COMPLAINTS

No CRA complaints were filed with the bank or the Federal Reserve Bank of Philadelphia during the evaluation period, and therefore this component of the Small Institution Lending Test was not evaluated.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES

Asian Bank is in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices, inconsistent with helping to meet community credit needs, was identified.

CRA APPENDICES

CRA APPENDIX A: GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area or assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and its physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language.
(1) Affordable housing (including multifamily rental housing) for low- or moderate-income individuals;
(2) Community services targeted to low- or moderate-income individuals;
(3) Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less;
(4) Activities that revitalize or stabilize-
    (i) Low-or moderate-income geographies;
    (ii) Designated disaster areas; or
    (iii)Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
        A. Rates of poverty, unemployment, and population loss; or
        B. Population size, density, and dispersion. Activities revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals; or
(5) Loans, investments, and services that-
    (i) Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
    (ii) Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and
    (iii)Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into male householder (a family with a male householder and no wife present) or female householder (a family with a female householder and no husband present).

Full-scope review: Performance under the lending, investment, and service tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancings of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance under the lending, investment, and service tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

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

Rated area: A rated area is a state or 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.

Small loan(s) to business(es): A loan included in loans to small businesses as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in loans to small farms as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of $500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

CRA APPENDIX B: SMALL BUSINESS LOAN DISTRIBUTION TABLES

2017 SMALL BUSINESS LOAN DISTRIBUTION TABLE

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	6	19.4%	963	11.4%	0	0.0%	0	0.0%
Moderate	9	29.0%	1,761	20.8%	0	0.0%	0	0.0%
Middle	13	41.9%	4,082	48.3%	0	0.0%	0	0.0%
Upper	3	9.7%	1,648	19.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**31**	**100.0%**	**8,453**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	31	100.0%	8,453	100.0%	0	0.0%	0	0.0%
Over $1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**31**	**100.0%**	**8,453**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	6	19.4%	542	6.4%	0	0.0%	0	0.0%
$100,001 - $250,000	14	45.2%	2,312	27.4%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	11	35.5%	5,600	66.2%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**31**	**100.0%**	**8,453**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	6	19.4%	542	6.4%	0	0.0%	0	0.0%
$100,001 - $250,000	14	45.2%	2,312	27.4%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)- $500k (Farm)	11	35.5%	5,600	66.2%	0	0.0%	0	0.0%
Over $1 Million (Bus) -$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**31**	**100.0%**	**8,453**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

2018 SMALL BUSINESS LOAN DISTRIBUTION TABLE

Income Categories	SMALL BUSINESS				SMALL FARM			
	#	%	$(000s)	%	#	%	$(000s)	%
By Tract Income								
Low	1	6.3%	150	1.7%	0	0.0%	0	0.0%
Moderate	5	31.3%	3,019	35.1%	0	0.0%	0	0.0%
Middle	7	43.8%	3,590	41.7%	0	0.0%	0	0.0%
Upper	3	18.8%	1,850	21.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**16**	**100.0%**	**8,609**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Revenue								
Total $1 Million or Less	16	100.0%	8,609	100.0%	0	0.0%	0	0.0%
Over $1 Million	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**16**	**100.0%**	**8,609**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size								
$100,000 or less	1	6.3%	96	1.1%	0	0.0%	0	0.0%
$100,001 - $250,000	5	31.3%	766	8.9%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)-$500k (Farm)	8	50.0%	4,247	49.3%	0	0.0%	0	0.0%
Over $1 Million (Bus)-$500k (Farm)	2	12.5%	3,500	40.7%	0	0.0%	0	0.0%
Total	**16**	**100.0%**	**8,609**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
By Loan Size and Revenue $1 Million or Less								
$100,000 or less	1	6.3%	96	1.1%	0	0.0%	0	0.0%
$100,001 - $250,000	5	31.3%	766	8.9%	0	0.0%	0	0.0%
$250,001 - $1 Million (Bus)- $500k (Farm)	8	50.0%	4,247	49.3%	0	0.0%	0	0.0%
Over $1 Million (Bus) -$500k (Farm)	2	12.5%	3,500	40.7%	0	0.0%	0	0.0%
Total	**16**	**100.0%**	**8,609**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**

CRA APPENDIX C: HMDA LOAN DISTRIBUTION TABLES

2014 HMDA LOAN DISTRIBUTION TABLE

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
Home Purchase								
Low	1	4.0%	263	4.4%	7	28.0%	1,506	25.1%
Moderate	11	44.0%	2,407	40.0%	2	8.0%	326	5.4%
Middle	8	32.0%	1,496	24.9%	2	8.0%	219	3.6%
Upper	5	20.0%	1,845	30.7%	4	16.0%	626	10.4%
Unknown	0	0.0%	0	0.0%	10	40.0%	3,334	55.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**25**	**100.0%**	**6,011**	**100.0%**	**25**	**100.0%**	**6,011**	**100.0%**
Refinance								
Low	0	0.0%	0	0.0%	2	20.0%	318	8.6%
Moderate	7	70.0%	3,028	81.8%	0	0.0%	0	0.0%
Middle	1	10.0%	175	4.7%	1	10.0%	236	6.4%
Upper	2	20.0%	500	13.5%	1	10.0%	250	6.8%
Unknown	0	0.0%	0	0.0%	6	60.0%	2,899	78.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**10**	**100.0%**	**3,703**	**100.0%**	**10**	**100.0%**	**3,703**	**100.0%**
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	84	100.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	84	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**84**	**100.0%**	**1**	**100.0%**	**84**	**100.0%**
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	25.0%	431	21.8%	0	0.0%	0	0.0%
Middle	2	50.0%	1,330	67.1%	0	0.0%	0	0.0%
Upper	1	25.0%	220	11.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	4	100.0%	1,981	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**1,981**	**100.0%**	**4**	**100.0%**	**1,981**	**100.0%**
HMDA Totals								
Low	1	2.5%	263	2.2%	9	22.5%	1,824	15.5%
Moderate	20	50.0%	5,950	50.5%	2	5.0%	326	2.8%
Middle	11	27.5%	3,001	25.5%	3	7.5%	455	3.9%
Upper	8	20.0%	2,565	21.8%	5	12.5%	876	7.4%
Unknown	0	0.0%	0	0.0%	21	52.5%	8,298	70.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**40**	**100.0%**	**11,779**	**100.0%**	**40**	**100.0%**	**11,779**	**100.0%**

2015 HMDA LOAN DISTRIBUTION TABLE

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	1	11.1%	245	8.4%	1	11.1%	126	4.3%
Moderate	4	44.4%	1,445	49.5%	1	11.1%	200	6.9%
Middle	3	33.3%	676	23.2%	1	11.1%	250	8.6%
Upper	1	11.1%	553	18.9%	2	22.2%	718	24.6%
Unknown	0	0.0%	0	0.0%	4	44.4%	1,625	55.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**9**	**100.0%**	**2,919**	**100.0%**	**9**	**100.0%**	**2,919**	**100.0%**
	Refinance							
Low	0	0.0%	0	0.0%	3	30.0%	370	9.0%
Moderate	5	50.0%	1,093	26.5%	1	10.0%	385	9.3%
Middle	4	40.0%	2,850	69.1%	0	0.0%	0	0.0%
Upper	1	10.0%	180	4.4%	2	20.0%	303	7.3%
Unknown	0	0.0%	0	0.0%	4	40.0%	3,065	74.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**10**	**100.0%**	**4,123**	**100.0%**	**10**	**100.0%**	**4,123**	**100.0%**
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	33.3%	110	25.6%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	2	66.7%	320	74.4%	1	33.3%	180	41.9%
Unknown	0	0.0%	0	0.0%	2	66.7%	250	58.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**430**	**100.0%**	**3**	**100.0%**	**430**	**100.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	3	75.0%	1,912	73.9%	0	0.0%	0	0.0%
Middle	1	25.0%	675	26.1%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	4	100.0%	2,587	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**2,587**	**100.0%**	**4**	**100.0%**	**2,587**	**100.0%**
	HMDA Totals							
Low	1	3.8%	245	2.4%	4	15.4%	496	4.9%
Moderate	13	50.0%	4,560	45.3%	2	7.7%	585	5.8%
Middle	8	30.8%	4,201	41.8%	1	3.8%	250	2.5%
Upper	4	15.4%	1,053	10.5%	5	19.2%	1,201	11.9%
Unknown	0	0.0%	0	0.0%	14	53.8%	7,527	74.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**26**	**100.0%**	**10,059**	**100.0%**	**26**	**100.0%**	**10,059**	**100.0%**

2016 HMDA LOAN DISTRIBUTION TABLE

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	1	4.3%	36	0.7%	9	39.1%	1,004	20.1%
Moderate	6	26.1%	1,132	22.6%	3	13.0%	760	15.2%
Middle	12	52.2%	2,612	52.2%	4	17.4%	1,436	28.7%
Upper	4	17.4%	1,227	24.5%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	7	30.4%	1,807	36.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**23**	**100.0%**	**5,007**	**100.0%**	**23**	**100.0%**	**5,007**	**100.0%**
	Refinance							
Low	0	0.0%	0	0.0%	1	11.1%	70	2.8%
Moderate	2	22.2%	935	37.7%	2	22.2%	350	14.1%
Middle	5	55.6%	1,235	49.8%	1	11.1%	215	8.7%
Upper	2	22.2%	310	12.5%	2	22.2%	970	39.1%
Unknown	0	0.0%	0	0.0%	3	33.3%	875	35.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**9**	**100.0%**	**2,480**	**100.0%**	**9**	**100.0%**	**2,480**	**100.0%**
	Home Improvement							
Low	1	100.0%	160	100.0%	1	100.0%	160	100.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**1**	**100.0%**	**160**	**100.0%**	**1**	**100.0%**	**160**	**100.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	33.3%	1,170	53.9%	0	0.0%	0	0.0%
Upper	2	66.7%	1,000	46.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	2,170	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**3**	**100.0%**	**2,170**	**100.0%**	**3**	**100.0%**	**2,170**	**100.0%**
	HMDA Totals							
Low	2	5.6%	196	2.0%	11	30.6%	1,234	12.6%
Moderate	8	22.2%	2,067	21.1%	5	13.9%	1,110	11.3%
Middle	18	50.0%	5,017	51.1%	5	13.9%	1,651	16.8%
Upper	8	22.2%	2,537	25.8%	2	5.6%	970	9.9%
Unknown	0	0.0%	0	0.0%	13	36.1%	4,852	49.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**36**	**100.0%**	**9,817**	**100.0%**	**36**	**100.0%**	**9,817**	**100.0%**

2017 HMDA LOAN DISTRIBUTION TABLE

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	$(000s)	%	#	%	$(000s)	%
	Home Purchase							
Low	5	15.2%	967	10.9%	10	30.3%	1,214	13.7%
Moderate	14	42.4%	2,715	30.7%	4	12.1%	942	10.7%
Middle	10	30.3%	2,773	31.4%	4	12.1%	888	10.1%
Upper	4	12.1%	2,377	26.9%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	15	45.5%	5,788	65.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**33**	**100.0%**	**8,832**	**100.0%**	**33**	**100.0%**	**8,832**	**100.0%**
	Refinance							
Low	3	42.9%	955	49.4%	0	0.0%	0	0.0%
Moderate	1	14.3%	150	7.8%	1	14.3%	180	9.3%
Middle	3	42.9%	830	42.9%	2	28.6%	330	17.1%
Upper	0	0.0%	0	0.0%	2	28.6%	775	40.1%
Unknown	0	0.0%	0	0.0%	2	28.6%	650	33.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**7**	**100.0%**	**1,935**	**100.0%**	**7**	**100.0%**	**1,935**	**100.0%**
	Home Improvement							
Low	1	25.0%	350	26.4%	1	25.0%	97	7.3%
Moderate	2	50.0%	217	16.4%	0	0.0%	0	0.0%
Middle	1	25.0%	759	57.2%	2	50.0%	470	35.4%
Upper	0	0.0%	0	0.0%	1	25.0%	759	57.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**4**	**100.0%**	**1,326**	**100.0%**	**4**	**100.0%**	**1,326**	**100.0%**
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	20.0%	1,200	24.1%	0	0.0%	0	0.0%
Middle	3	60.0%	2,870	57.7%	0	0.0%	0	0.0%
Upper	1	20.0%	900	18.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	5	100.0%	4,970	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**5**	**100.0%**	**4,970**	**100.0%**	**5**	**100.0%**	**4,970**	**100.0%**
	HMDA Totals							
Low	9	18.4%	2,272	13.3%	11	22.4%	1,311	7.7%
Moderate	18	36.7%	4,282	25.1%	5	10.2%	1,122	6.6%
Middle	17	34.7%	7,232	42.4%	8	16.3%	1,688	9.9%
Upper	5	10.2%	3,277	19.2%	3	6.1%	1,534	9.0%
Unknown	0	0.0%	0	0.0%	22	44.9%	11,408	66.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	**49**	**100.0%**	**17,063**	**100.0%**	**49**	**100.0%**	**17,063**	**100.0%**

CRA APPENDIX D: ASSESSMENT AREA MAPS

2010 Census Data

2015 ACS Data

CHAT LEGEND
2015 Census Year

INCOME
- Low
- Moderate
- Middle
- Upper
- Unknown
- AA Boundary

FEATURES
- Water Body