



PUBLIC DISCLOSURE

February 24, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

EH National Bank
Charter Number: 24493

9420 Wilshire Boulevard
Beverly Hills, CA 90212

Office of the Comptroller of the Currency

1551 North Tustin Avenue
Suite 1050
Santa Ana, CA 92705

Note: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is more than reasonable.
- The bank originated or purchased a majority of loans within its assessment areas (AAs).
- The bank's geographic distribution of home mortgage loans and small business loans is excellent.
- The bank's distribution of small business loans to business of different sizes is reasonable.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is more than reasonable.

Examiners analyzed EHNB's quarterly average LTD ratio since the prior CRA examination, covering 12 consecutive quarters between March 31, 2021, to December 31, 2023. The bank's average LTD ratio was 107.9 percent and ranged from a low of 89.3 percent to a high of 123.4 percent. The bank's average LTD during the performance period compares favorably with peers, which consists of four banks that operate within the City and County of Los Angeles. The bank's peer group had an average LTD of 87.3 percent and ranged from a low of 68.5 percent and a high of 100.3 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

The bank originated and purchased 67.7 percent of its total loans inside its AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The inside and outside analysis is based on all home mortgage loans and all small business loans originated during the evaluation period.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans (000s)				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	83	68.6	38	31.4	121	110,765	65.3	58,781	34.7	169,545
Small Business	43	66.2	22	33.8	65	13,211	74.3	4,562	25.7	17,773
Total	126	67.7	60	32.3	186	123,976	66.2	63,343	33.8	187,319

*Source: Bank Data.
Due to rounding, totals may not equal 100.0%*

Description of Institution

EH National Bank (EHNB or bank) is a full-service commercial bank headquartered in Beverly Hills, California. EHNB operates two full-service branches in California, one in Beverly Hills, and the other in Temecula. The bank is not a subsidiary of a holding company and does not have any affiliates or subsidiaries. EHNB trades under the name of Excel Bank. The bank does not have Automated Teller Machines (ATM) at either branch.

The bank began operations in 2005 with a primary strategy to originate and sell nationwide Small Business Administration (SBA) and other federally guaranteed loans in the secondary market. In 2011, the bank's business strategy changed the focus to lend within its AA instead of nationwide. EHNB offers commercial loan products such as loans secured by commercial real estate, commercial and industrial loans, and lines of credit. The bank also offers loans secured by investment in residential real estate such as multifamily apartment buildings and 1-4 family single family homes. The bank does not offer consumer credit products. EHNB was an active participant in the Small Business Administration (SBA) Paycheck Protection Program (PPP) and originated 47 PPP loans in 2021.

At December 31, 2023, the bank had \$293.4 million in total assets, net loans totaled \$245.6 million and total deposits were \$218.5 million. Net loans represent 83.7 percent of total assets. Common equity tier 1 capital totaled \$28.5 million, and the bank's leverage ratio was 9.3 percent. At December 31, 2023, residential loans totaled \$180.9 million and represented 72.1 percent of the total loan portfolio. Business loans totaled \$69.7 million and represented 27.8 percent of the total loan portfolio in the same period. At December 31, 2023, the largest category of loan type was multifamily loans, representing 63.1 percent of total loans. The second largest loan type was commercial real estate, which totaled 24.1 percent of total loans.

The Office of the Comptroller of the Currency (OCC) executed a formal agreement with EHNB in October of 2023, for unsafe or unsound practices, including those relating to inadequate capital and strategic planning, inadequate interest rate risk management, inadequate concentration risk management, and failure to maintain adequate levels of liquidity and satisfactory liquidity management practices. The board and management may have adjusted the overall lending strategy to focus on maintaining adequate levels of liquidity. The bank's adjusted strategy and other market limitations may have contributed to the low lending volume of loans evident in the last 12 to 18 months of the evaluation period.

The previous CRA examination was completed using Small Bank procedures, and EHNB was rated satisfactory in the report dated January 24, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated the bank's performance under the Small Bank CRA procedures, with an evaluation period of January 1, 2021, through December 31, 2023. Due to the census data changing during the

evaluation period, the lending test was split into two analyses. The 2021 analysis compared loans originated from January 1, 2021, through December 31, 2021, to the results of the 2015 American Community Survey (ACS). The 2022 to 2023 analysis compared loans originated from January 1, 2022, through December 31, 2023 to the results of the 2020 US Census.

Consistent with the business strategy of EHNB, OCC examiners reviewed the bank's two primary loan products: loans to small business and Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR) reportable loans. Loans to small businesses include commercial loans secured by owner-occupied and non-owner-occupied commercial real estate, loans secured by business assets, as well as loans made under the PPP program in 2021. HMDA LAR reportable loans include loans by investment 1-4 family residences, multifamily properties, and mixed-use income-producing properties where revenue is generated from both commercial and residential units. For HMDA LAR data purposes, the bank is not required to report income information on loans for investment 1-4 family residences, multifamily properties, and mixed-use income-producing properties. As the income information for these borrowers is unknown, the income distribution analysis would not be meaningful and was not included in the scope of this review. For home mortgage loans, OCC examiners placed all the weight on the bank's distribution by income level of the geography.

EHNB is not a HMDA LAR or CRA Loan Register reporter. Examiners completed a data integrity review of the loan data, which allowed for the use of all loan originations to be considered for the CRA evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same or combined statistical area (CSA) are combined and evaluated as a single AA. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's rating is based on lending performance in the state of California. The state rating is based on performance in the Los Angeles County AA, and the Riverside County AA. The OCC performed a full-scope examination of the Los Angeles County AA, and a limited-scope examination of the Riverside County AA. The limited-scope review is due to management opening the branch in the city of Temecula, in Riverside County, in April of 2023. The lending test placed equal weight on both home mortgage and small business lending.

Refer to the "Scope" section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of California

CRA rating for the State of California: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's geographic distribution of home mortgage and small business loans is excellent.
- The bank's distribution of loans to businesses of different sizes is reasonable.

Description of Institution's Operations in California

EHNB designated the city and county of Los Angeles as its sole AA from January 1, 2021, through April 5, 2023. Effective April 5, 2023, the bank expanded its AA to include the county of Riverside along with Los Angeles County. As Los Angeles County and Riverside County are in separate metropolitan statistical areas (MSA), they are analyzed separately. During the performance period, the bank operated two branch locations in its AA. Los Angeles County is part of the Los Angeles-Long Beach-Glendale Metropolitan District (MD). The branch in the Los Angeles County AA is located in an upper-income census tract (CT) in Beverly Hills, California. The bank opened a branch in the city of Temecula in Riverside County on April 5, 2023. This branch is located in a middle-income CT in Riverside.

Los Angeles County AA

The Los Angeles County AA consists of 2,498 CTs: 159 low-income; 694 moderate-income; 711 middle-income; and 857 upper-income. In addition, 77 CTs do not report data and are listed as unknown. The Los Angeles County AA meets the regulation requirements and does not arbitrarily exclude low- and moderate-income (LMI) geographies. As a result of the 2020 U.S. Census, the AA has a total population of 10 million. Population decline is minimal when compared with 2010; a decline of approximately 24,000 persons.

Deposit competition in the Los Angeles County AA is strong. Based on the Federal Deposit Institution Corporation (FDIC) Deposit Market Share data as of June 30, 2021, deposits totaled \$2.09 billion in the AA. EHNB had a deposit share of 0.01 percent and ranked 148th out of 192 banks. As of June 30, 2023, the FDIC Deposit Market Share data showed that deposits increased to \$516.3 billion in the AA. EHNB deposit market share increased to 0.04 percent and ranked 73rd of 92 banks in the Los Angeles AA. The three largest banks by deposits were Bank of America, Wells Fargo, and JPMorgan Chase in 2021 and 2023, with a combined market share of 49.3 percent and 50.6, respectively.

There is significant competition for small business loans in the Los Angeles County AA. The 2021 CRA small business aggregate data reflects a total of 311 small business loan reporters in the AA. The top four lenders were American Express, JPMorgan Chase, Bank of America, and Wells Fargo Bank with a combined total of 59.4 percent of market share. The 2023 CRA small business aggregate data reflects a decrease in small business loan reporters, at 234 reporters. However, the top four lenders were American Express, JPMorgan Chase, Bank of America, and Citibank, with 67.8 percent of the market share.

According to Moody’s Analytics, the primary economic drivers in 2023 for Los Angeles County are tourism, logistical support for transportation, and high technology. The Bureau of Labor Statistics reported the monthly average unemployment in Los Angeles County fluctuated during the evaluation period, with a low of 4.4 percent and a high of 11.0 percent during the evaluation period. The unemployment rate for December 2023 was 5.0 percent.

There is significant competition in the Los Angeles County AA for home mortgage loans. According to the 2021 HMDA aggregate data, there were 834 HMDA reporters in the Los Angeles County AA. The top four lenders were United Wholesale Mortgage, Rocket Mortgage, JPMorgan Chase, LoanDepot.com LLC with a combined total of 25.48 percent of market share. According to 2023 HMDA aggregate data, there were 713 HMDA loan reporters in the Los Angeles County AA. The top four lenders in 2023 were JP Morgan Chase, United Wholesale Mortgage, Rocket Mortgage, and Bank of America, with a combined market share of 32.4 percent.

Housing in Los Angeles County is expensive. Affordable housing for low- and moderate-income households is identified as a community need in the AA. Based on 2023 American Community Survey (ACS) 1-Year data, the housing affordability ratio is 8.93 in Los Angeles County. The affordability ratio in Los Angeles County is higher than the statewide ratio of 7.22 percent and significantly higher than the nationwide ratio of 3.86 percent. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. A higher value affordability ratio indicates housing is more expensive.

Area	Median Value of Owner-Occupied Housing	Median Household Income	Housing Affordability Ratio
Los Angeles County	783,300	87,760	8.93
Riverside County	510,300	89,672	5.69
California	695,400	96,334	7.22
United States	303,400	78,538	3.86

Source: 2023 ACS Data

For the Los Angeles County AA, the 2020 U.S. Census data reports 43.1 percent of the total housing units in the AA as owner-occupied, with rental-occupied units at 50.7 percent and vacant units at 6.1 percent. There are 270,711 housing units in low-income geographies with 13.5 percent of these units being owner-occupied, 79.7 percent renter-occupied, and 6.8 percent vacant. There are 914,450 housing units in moderate-income geographies with 28.2 percent of these units being owner-occupied, 65.9 percent renter-occupied, and 5.9 percent vacant. The percentage of owner-occupied housing units in low- and moderate-income (LMI) CTs is significantly lower than in middle- and upper-income geographies. Owner-occupied units represent 46.2 percent and 57.1 percent of units in middle- and upper-income CTs, respectively.

Los Angeles County AA 2021

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2021 Los Angeles County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,346	9.4	28.7	24.9	34.8	2.2
Population by Geography	10,038,388	8.6	29.3	26.3	35.1	0.8

Housing Units by Geography	3,476,718	7.8	26.3	24.8	40.6	0.5
Owner-Occupied Units by Geography	1,499,879	2.4	17.2	26.6	53.7	0.1
Occupied Rental Units by Geography	1,763,190	12.2	34.2	23.6	29.2	0.9
Vacant Units by Geography	213,649	8.7	25.4	22.8	42.2	1.0
Businesses by Geography	1,150,937	4.7	19.2	21.2	52.6	2.3
Farms by Geography	10,514	3.0	17.3	24.2	54.3	1.2
Family Distribution by Income Level	2,186,485	24.5	16.3	16.7	42.4	0.0
Household Distribution by Income Level	3,263,069	25.9	15.4	15.8	43.0	0.0
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA	\$62,703	Median Housing Value				\$495,540
		Median Gross Rent				\$1,292
		Families Below Poverty Level				14.3%
<i>Source: 2015 ACS and 2021 D&B Data, Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Los Angeles County AA 2022-2023

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2022-2023 Los Angeles County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,498	6.4	27.8	28.5	34.3	3.1
Population by Geography	10,014,009	5.7	28.2	29.9	34.7	1.4
Housing Units by Geography	3,559,790	5.4	25.4	28.1	39.5	1.6
Owner-Occupied Units by Geography	1,534,472	1.5	16.1	30.6	51.3	0.4
Occupied Rental Units by Geography	1,798,032	8.8	33.8	26.5	28.5	2.4
Vacant Units by Geography	227,286	5.1	21.9	23.0	47.0	3.0
Businesses by Geography	1,524,041	3.8	18.0	25.1	49.9	3.2
Farms by Geography	13,760	2.7	16.9	25.9	52.6	2.0
Family Distribution by Income Level	2,211,342	23.9	16.5	17.5	42.2	0.0
Household Distribution by Income Level	3,332,504	25.9	15.0	16.3	42.7	0.0
Median Family Income MSA - 31084 Los Angeles-Long Beach-Glendale, CA	\$80,317	Median Housing Value				\$681,607
		Median Gross Rent				\$1,601
		Families Below Poverty Level				10.5%
<i>Source: 2020 U.S. Census and 2023 D&B Data, Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Riverside County AA

The Riverside County AA consists of 518 CTs: 19 low-income; 128 moderate-income; 190 middle-income; and 175 upper-income. In addition, six CTs do not report data and are listed as unknown. The Riverside County AA does not arbitrarily exclude low- and moderate-income (LMI) geographies.

Riverside County is part of the Riverside-San Bernardino-Ontario Metropolitan Statistical Area (MSA) As a result of the 2020 U.S. Census, the AA has a total population of 2.4 million persons.

Deposit competition in the Riverside County AA is strong. Based on the FDIC Deposit Market Share data as of June 30, 2023, deposits totaled \$40.34 billion in the AA. EHNB had a deposit share of 0.01 percent and ranked 28th out of 28 banks. The three largest banks by deposits were Bank of America, JPMorgan Chase, and Wells Fargo with a combined market share of 65.62 percent.

There is significant competition for small business loans in the Riverside County AA. According to the 2023 CRA small business aggregate data, there were 145 small business loan reporters in Riverside County. The top four lenders are American Express, JP Morgan Chae, Bank of America, and Citi Bank with a combined market share of 65.1 percent.

According to Moody’s Analytics, the primary economic drivers of Riverside County in 2023 were transportation and shipping logistics, and defense contractors. The Bureau of Labor Statistics reported the monthly average unemployment in Riverside County remained below 5.5 in 2023, with a low of 3.9 percent and a high of 5.5 percent. The unemployment rate for December 2023 was reported at 5.1 percent.

In the Riverside County AA there were 591 mortgage loan originators. The top four lenders were United Wholesale Mortgage, Rocket Mortgage, SchoolsFirst Federal Credit Union, and PennyMac Loan Services LLC with a combined market share of 23.5 percent.

Riverside County AA’s housing is less affordable than nationwide. The housing affordability ratio is 5.7 percent, above the national average of 3.9 percent. The 2020 U.S. Census data reports 58.8 percent of the total housing units in the AA as owner-occupied, with rental-occupied units at 28.3 percent, and vacant units at 12.9 percent. Per the U.S. Census data, the AA contains 25,554 housing units in low-income CTs; of which 2.0 percent are owner occupied and 2.5 percent are vacant. There are 195,383 housing units in moderate income CTs; of which 18.3 percent are owner-occupied and 24.1 percent are vacant. The percentage of owner-occupied housing units in LMI CTs is lower than in middle- and upper-income geographies. Owner-occupied units represent 37.5 and 41.7 percent of units in middle- and upper-income CTs, respectively.

Riverside County AA 2023

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2023 Riverside County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	518	3.7	24.7	36.7	33.8	1.2
Population by Geography	2,418,185	3.1	22.8	37.1	36.1	0.9
Housing Units by Geography	845,066	2.0	18.3	37.5	41.7	0.6
Owner-Occupied Units by Geography	497,259	2.0	18.3	37.5	41.7	0.6
Occupied Rental Units by Geography	239,154	5.5	32.8	38.6	22.6	0.5
Vacant Units by Geography	108,653	2.5	24.1	33.6	38.6	1.2
Businesses by Geography	227,648	1.7	20.7	36.4	40.6	0.7

Farms by Geography	5,255	2.5	19.8	36.3	41.7	0.6
Family Distribution by Income Level	539,458	2.5	21.1	37.6	38.4	0.5
Household Distribution by Income Level	736,413	3.7	24.7	36.7	33.8	1.2
Median Family Income MSA -	\$85,691	Median Housing Value		\$370,585		
		Median Gross Rent		\$1,484		
		Families Below Poverty Level		12.3%		
<i>Source: 2020 U.S. Census and 2023 D&B Data. Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Community Contacts

OCC Examiners reviewed four community contacts; two for Los Angeles County AA and two for Riverside County AA. The contacts included organizations focused on community revitalization, affordable housing creation, and small business lending. The contacts identified affordable housing, financial literacy and homeownership education, and affordable loan programs as credit needs.

Scope of Evaluation in California

The OCC performed a full-scope evaluation on the Los Angeles County AA and a limited-scope evaluation on the Riverside County AA. The limited-scope evaluation for the Riverside County AA was warranted as the branch was opened in April of 2023, and the lending test can only be performed for 2023. More weight was placed on the bank's performance in the Los Angeles County AA due to the short length of time the Temecula Branch had been open during the evaluation period.

EHNB's primary loan products, based on originations and purchases during the evaluation period, are home mortgages and small loans to businesses.

LENDING TEST

The bank's performance under the Lending Test in the state of California is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Los Angeles County AA is reasonable. The analysis of the lending test included home mortgage loans and small business loans.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state of California.

Home Mortgage Loans

Refer to Table O in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

For 2021, the bank's lending in low-income CTs was 16.7 percent and compares favorably to the demographic of 12.2 percent and the aggregate of 13.1 percent. The bank's lending in moderate-income CTs for 2021 was 44.4 percent, which compares favorably to the demographic of 34.2 percent and the aggregate of 34.1 percent.

For the 2022-2023 period, the bank's lending in low-income CTs was 22.2 percent, which compares favorably to the demographic of 8.8 percent and the aggregate of 11.4 percent. The bank's lending in moderate-income CTs of 48.9 percent also compares favorably to the demographic of 33.8 percent and the aggregate of 36.1 percent.

Small Loans to Businesses

Refer to Table Q in the California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

For 2021, the bank's lending in low-income tracts was 9.1 percent which compares favorably than the aggregate lending of 4.4 percent and percentage of businesses of 4.8 percent. For moderate-income tracts the lending was 15.2 percent of loans which is lower than the aggregate lending of 19.8 and the percentage of businesses of 19.2

In 2022-2023, the bank's lending in low-income CTs was 28.6 percent, which compares favorably to the percentage of businesses of 3.8 percent and the aggregate lending of 3.5 percent. The bank's lending in moderate-income CTs was 14.3 percent, which is lower than the demographic of 18.0 percent and the aggregate of 18.9 percent.

Lending Gap Analysis

OCC examiners reviewed summary reports, maps, and analyzed the bank's home mortgage and small business lending activity over the evaluation period to identify any gaps in geographic distribution of loans. The OCC did not identify any unexplained conspicuous gaps in the bank's AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Refer to Table R in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

In 2021, the distribution of loans to businesses of different sizes was reasonable. Included in this analysis were 27 PPP loans with principal balances of \$1 million or less, that total \$6.35 million. The PPP loans extended by the bank in the Los Angeles County AA helped support small businesses during the COVID-19 pandemic. The percentage of loans to small businesses originated or purchased was

lower than the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders.

Examiners considered the impact of the high percentage of small loans to businesses with revenue information unavailable on the borrower distribution analysis. For 81.8 percent of small loans to businesses in the AA, borrower revenue information was not available. All of the loans with unknown revenues (100 percent) were PPP loans which did not require the bank to collect or consider gross annual revenues. The bank's PPP lending was positively considered in our assessment of the Distribution of Loans by Income Level of the Borrower.

In 2022-2023, the bank's lending to small businesses with revenues less than \$1 million was 42.9 percent of total loans. This compares less favorably than the demographic of 92.7 percent and the aggregate of 53.8 percent. However, the high AA demographic percentage and the lower aggregate lending percentage indicates that small businesses in the AA may not have credit needs or may not be creditworthy.

Responses to Complaints

The bank did not receive any CRA related complaints during the PE period.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Riverside County AA is weaker than the bank's overall performance under the Lending Test in the full scope area.

The bank's loan origination and purchasing volume in the Riverside County AA was low in 2023. There was not enough loan activity to complete a meaningful analysis for 2023. This did not impact the overall Lending Test conclusion, and weight was given to the Full-Scope Review.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2021 to 12/31/2023	
Bank Products Reviewed:	Home mortgage and small business loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Los Angeles County	Full-Scope	
Riverside County	Limited-Scope	Branch in Temecula opened April 2023; only reviewed loan activity for 2023.
States		
California	Full-Scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS	EH National Bank
Overall Bank:	Lending Test Rating
EH National Bank	Satisfactory
State:	
State of California	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, 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 (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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 (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties 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 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.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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) 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.

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

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Multifamily	% Bank Loans	Aggregate	% of Multifamily	% Bank Loans	Aggregate	% of Multifamily	% Bank Loans	Aggregate	% of Multifamily	% Bank Loans	Aggregate	% of Multifamily	% Bank Loans	Aggregate
Los Angeles County	36	41,280,500	100.0	454,866	12.2	16.7	13.1	34.2	44.4	34.1	23.6	19.4	24.7	42.2	19.4	26.7	0.9	0.0	1.4
Total	36	41,280,500	100.0	454,866	12.2	16.7	13.1	34.2	44.4	34.1	23.6	19.4	24.7	42.2	19.4	26.7	0.9	0.0	1.4

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Multifamily	% Bank Loans	Aggregate	% of Multifamily	% Bank Loans	Aggregate	% of Multifamily	% Bank Loans	Aggregate	% of Multifamily	% Bank Loans	Aggregate	% of Multifamily	% Bank Loans	Aggregate
Los Angeles County	45	68,834,250	100.0	114,236	8.8	22.2	11.4	33.8	48.9	36.1	26.5	17.8	23.9	28.5	8.9	25.7	2.4	2.2	2.8
Total	45	68,834,250	100.0	114,236	8.8	22.2	11.4	33.8	48.9	36.1	26.5	17.8	23.9	28.5	8.9	25.7	2.4	2.2	2.8

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Multifamily	% Bank Loans	Aggregate	% of Multifamily	% Bank Loans	Aggregate	% of Multifamily	% Bank Loans	Aggregate	% of Multifamily	% Bank Loans	Aggregate	% of Multifamily	% Bank Loans	Aggregate
Riverside County	2	650,000	9.3	49,183	5.5	0.0	--	32.8	0.0	--	38.6	50.0	--	22.6	50.0	--	0.5	0.0	--
Total	2	650,000	9.3	49,183	5.5	0.0	--	32.8	0.0	--	38.6	50.0	--	22.6	50.0	--	0.5	0.0	--

Source: 2020 U.S. Census; 01/01/2023 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Los Angeles County	33	6,483	100.0	445,991	4.8	9.1	4.4	19.2	15.2	19.8	21.2	0.0	22.2	52.6	72.7	51.6	2.3	3.0	2.1
Total	33	6,483	100.0	445,991	4.8	9.1	4.4	19.2	15.2	19.8	21.2	0.0	22.2	52.6	72.7	51.6	2.3	3.0	2.1

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-23
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Los Angeles County	7	3,869	100.0	404,409	3.8	28.6	3.5	18.0	14.3	18.9	25.1	14.3	26.2	49.9	28.6	48.6	3.2	14.3	2.8
Total	7	3,869	100.0	404,409	3.8	28.6	3.5	18.0	14.3	18.9	25.1	14.3	26.2	49.9	28.6	48.6	3.2	14.3	2.8

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2023
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Riverside County	3	1,325	50.0	67,083	1.7	0.0	1.5	20.6	0.0	18.8	36.4	100.0	35.9	40.6	0.0	43.0	0.7	0.0	0.9
Total	3	1,325	50.0	67,083	1.7	0.0	1.5	20.6	0.0	18.8	36.4	100.0	35.9	40.6	0.0	43.0	0.7	0.0	0.9

*Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Los Angeles County	33	6,483	100.0	445,991	91.0	9.1	45.1	3.6	9.1	5.5	81.8
Total	33	6,483	100.0	445,991	91.0	9.1	45.1	3.6	9.1	5.5	81.8
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-23
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Los Angeles County	7	5,403	100.0	404,409	92.7	42.9	53.8	2.7	57.1	4.6	0.0
Total	7	5,403	100.0	404,409	92.7	42.9	53.8	2.7	57.1	4.6	0.0
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2023 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2023

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Riverside County	3	1,325	50.0	67,083	92.0	66.7	55.7	2.4	0.0	5.6	33.3
Total	3	1,325	50.0	67,083	92.0	66.7	55.7	2.4	0.0	5.6	33.3

*Source: 2023 D&B Data; 01/01/2023 - 12/31/2023 Bank Data; 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*