



PUBLIC DISCLOSURE

April 29, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

El Dorado Savings Bank, F.S.B.
Charter Number 706164

4040 El Dorado Road
Placerville, CA 95667-8238

Office of the Comptroller of the Currency

25 Jesse Street at Ecker Square
16th Floor
San Francisco, CA 94105

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.

Table of Contents

Overall CRA Rating2

Description of Institution3

Scope of the Evaluation4

Discriminatory or Other Illegal Credit Practices Review5

State Rating.....6

 State of California6

 State of Nevada22

Appendix A: Scope of Examination31

Appendix B: Summary of MMSA and State Ratings32

Appendix C: Definitions and Common Abbreviations33

Appendix D: Tables of Performance Data37

Overall CRA Rating

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

The following table indicates the performance level of El Dorado Savings Bank, F.S.B. with respect to the Lending, Investment, and Service Tests:

Performance Levels	El Dorado Savings Bank, F.S.B. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the bank's performance across all rating areas. The bank's overall lending performance within the assessment areas reflect good responsiveness, for the purposes of CRA, to the credit needs in the assessment areas. The overall geographic distribution of loans, for the purposes of CRA, reflects adequate penetration throughout the assessment areas. Overall distribution of loans by income of the borrower reflects excellent penetration throughout the assessment areas.
- The Investment Test rating is based on the level of qualified investments in the assessment areas.
- The Service Test rating is based on the bank's performance across all rating areas. Overall retail delivery systems are accessible, for the purposes of CRA, in the assessment areas. Limited branch opening and closing activity has not altered delivery systems. Overall, banking hours do not vary in a way that inconveniences portions of the assessment areas. Branch hours are consistent across all assessment areas, and any differences were reasonably explained.

Lending in Assessment Area

A substantial majority of the bank's loans are made in the bank's assessment areas.

The bank originated 98.7 percent of its total loans inside the bank's assessment areas (AAs) during the evaluation period. This analysis is performed at the bank, rather than the AA, level. During the evaluation period, the bank did not have any affiliate lending activities included in this assessment.

Table D - Lending Inside and Outside of the Assessment Area 2020-2022										
Loan Category	Number of Loans				Total	Dollar Amount of Loans				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,678	98.7	22	1.3	1,700	416,949,568	98.8	4,905,500	1.2	421,855,068
Total	1,678	98.7	22	1.3	1,700	416,949,568	98.8	4,905,500	1.2	421,855,068

Source: Bank Data
Due to rounding, totals may not equal 100.0%
Dollar amounts for Small Business, Small Farm and Consumer loans are multiplied by 1000.

Description of Institution

El Dorado Savings Bank, F.S.B. (EDSB or bank) is a federally chartered stock savings bank headquartered in Placerville, California. As of December 31, 2022, EDSB had total assets of \$2.7 billion, total deposits of \$2.4 billion, \$576.2 million in total loans, and \$271.9 million in total tier 1 capital.

EDSB has three assessment areas covering two states. Two of the bank's AAs are in California and one is in Nevada. The first California AA includes parts of the Sacramento-Roseville CSA (Sacramento AA), which consists of the whole counties of El Dorado, Placer, Sacramento, and Nevada. The second California AA covers the whole non-Metropolitan Statistical Area (MSA) counties of Amador, Calaveras, Tuolumne, and Inyo (California Non-MSA AA). The bank has one assessment area in Nevada, which covers the whole counties of Washoe and Douglas in the Reno-Carson City-Fernley Combined Statistical Area (CSA) (Reno AA). EDSB is ranked ninth in the Sacramento AA with a 2.4 percent deposit market share; first in the California Non-MSA AA with a 17.9 percent deposit market share; and 12th in the Reno AA with a 0.9 percent deposit market share. The bank's major deposit competitors are Wells Fargo Bank, Bank of America, and U.S. Bank.

EDSB maintains 31 full-service branches in California and four branches in Nevada. Twenty-one branches are in the Sacramento AA, and 10 branches are in the California Non-MSA AA. The bank also has four branches in the Reno AA. EDSB operates 35 full service automated teller machines (ATMs), with at least one at each of its branch locations. See Service Test for additional information. There has not been any merger or acquisition activity since the prior evaluation.

Approximately 93 percent of the bank's loan portfolio is composed of mortgage loans for the purchase, improvement, and refinance of owner-occupied one-to-four family dwellings. EDSB also originates home equity loans and lines of credit, small business loans, and residential-secured small farm loans.

The concentration of one-to-four family mortgage loans warrants the emphasis on residential mortgage loans in the evaluation of the bank's CRA performance. EDSB does not sell the loans it originates. The bank does not actively engage in commercial lending, although a small segment of the one-to-four family loan portfolio includes investor-owned single-family residences. As a portfolio lender, EDSB has traditionally offered flexible and alternative underwriting standards to qualify creditworthy borrowers who may not meet traditional underwriting guidelines.

EDSB's financial condition, size, and location do not adversely affect the bank's ability to meet the credit needs of the community. There are no legal or regulatory impediments that prevent the bank from serving community credit needs. EDSB's CRA performance was last evaluated in February 2021, at which time the bank was rated Satisfactory.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the bank's CRA performance under the Large Bank Lending, Investment, and Service Tests. The evaluation period was January 1, 2020, through December 31, 2022.

For the Lending Test, the OCC analyzed home mortgage loans as reported under the Home Mortgage Disclosure Act (HMDA). This evaluation period included two census periods. For mortgage lending activity in 2020-2021, the OCC compared the bank's performance to the HMDA aggregate lender data as well as the 2015 American Community Survey (ACS) census data. For mortgage lending activity during 2022, the OCC compared the bank's performance to the aggregate lender data and the 2020 census data, which the FFIEC released in 2022.

The Investment Test considers the bank's qualified CD investments, as well as grants and donations that were made during the evaluation period. Prior period investments that remain outstanding and continue to benefit the bank's AAs were also considered at year-end 2022 book value. For full-scope areas, the OCC also considered the complexity and innovativeness of the investments, the responsiveness of the investments to community development needs, and the bank's demonstrated leadership.

Service Test performance considers both retail services and CD services. For retail services, the geographic distribution of the bank's branches among low- moderate, middle, and upper-income geographies was given the most weight. It also considers the availability and effectiveness of alternative delivery systems (ADS) for delivering retail banking services including ATMs, online banking, and mobile banking. Branch hours and the range of services provided in low-, moderate-, middle-, and upper-income geographies received a lesser amount of weight in the full-scope areas and were not considered in the limited-scope areas. Finally, the level and responsiveness of CD services was evaluated in full-scope areas.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA, multistate metropolitan statistical area (MMSA), or CSA are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section 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 overall rating is a blend of state ratings.

EDSB maintains deposit operations in California and Nevada. The bank's branches serve a portion of the Sacramento-Roseville CSA (Sacramento AA) and four non-MSA counties (California Non-MSA) in the state of California, and a portion of the Reno-Carson City-Fernley CSA (Reno AA) in the state of Nevada. The OCC placed greater weight on the bank's performance in the state of California. The bank's deposits in the state of California represent 94 percent of total deposits. The number of bank branches in the state of California represent 89 percent of all bank branches. In addition, 96 percent of the bank's mortgage loans are made in the state of California. For these reasons, the OCC placed less weight on the bank's performance in the state of Nevada.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA 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 C.F.R. § 25.28(c) (March 29, 2024) 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 assessment area 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 any final determinations that this institution 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, including information that may be under evaluation as of the date of this performance evaluation, 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 or prior performance evaluations.

State Rating

State of California

CRA rating for the State of California: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Overall lending levels, for the purposes of CRA and based on the data contained in the tables listed in this section, reflect good responsiveness to the needs in the AAs.
- An overall adequate distribution of loans, for the purposes of CRA and based on the data contained in the tables listed in this section, in geographies of different income levels in the AAs.
- An overall excellent distribution of loans, for the purposes of CRA and based on the data contained in the tables listed in this section, among individuals of different income levels in the AAs.
- A good level of CD investments that are responsive to AA needs.
- Overall retail delivery systems are reasonably accessible, for the purposes of CRA, to geographies and individuals in the AAs.

Description of Institution's Operations in California

According to the June 30, 2022, FDIC Deposit Market Share Report, EDSB had 31 branch offices serving its California AAs. EDSB reported total deposits of nearly \$2.4 billion in these offices, which represented 93.7 percent of total bank deposits. The branches are full-service, offering the full range of EDSB's loan and deposit products. EDSB is primarily a home mortgage lender. The number and dollar volume of loans granted by EDSB within the state of California represented approximately 94.3 percent and 94.4 percent, respectively, of the bank's total reportable lending.

Based on branch locations, EDSB serves a portion of the Sacramento-Roseville CSA and four non-MSA counties that are combined into a single non-MSA AA.

Sacramento AA

According to the 2020 U.S. Census (Census) data, the Sacramento AA consisted of 465 contiguous census tracts, which included 44 low-income census tracts (CTs), 109 moderate-income CTs, 157 middle-income CTs, 152 upper-income CTs, and three CTs without an income classification. As a result of the Census data, the AA gained 71 CTs since the last evaluation with the changes being one less low-income CT, an increase of 17 moderate-income CTs, an increase of 33 middle-income CTs, an increase of 18 upper-income CTs, and an increase of four CTs without an income classification.

The bank's Sacramento AA encompasses a portion of the larger Sacramento-Roseville CSA and covers the El Dorado County, Placer County, and Sacramento County portions of the Sacramento-Roseville-

Folsom MSA, as well as Nevada County. The Census estimates the population in Sacramento AA to be 2.3 million in 2022. The population of the AA grew by 8.1 percent since the 2010 Census.

Demographics

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2020-2021 Sacramento-Roseville CSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	465	9.5	23.4	33.8	32.7	0.6
Population by Geography	2,112,775	9.2	23.0	33.8	33.9	0.1
Housing Units by Geography	858,328	8.8	22.3	35.1	33.6	0.2
Owner-Occupied Units by Geography	464,116	4.5	17.8	35.0	42.7	0.0
Occupied Rental Units by Geography	302,015	15.0	29.8	34.9	19.8	0.5
Vacant Units by Geography	92,197	10.6	20.1	36.0	32.8	0.5
Businesses by Geography	200,690	8.5	22.4	30.2	37.1	1.8
Farms by Geography	4,792	5.1	18.7	32.0	43.6	0.6
Family Distribution by Income Level	511,506	23.4	16.1	18.4	42.1	0.0
Household Distribution by Income Level	766,131	24.6	15.5	17.1	42.7	0.0
Median Family Income MSA - 40900 Sacramento-Roseville-Folsom, CA MSA		\$71,829	Median Housing Value			\$292,574
Median Family Income Non-MSAs - CA		\$56,948	Median Gross Rent			\$1,104
			Families Below Poverty Level			11.4%

*Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(* The NA category consists of geographies that have not been assigned an income classification.*

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2022 Sacramento-Roseville CSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	536	8.0	23.5	35.4	31.7	1.3
Population by Geography	2,283,220	7.7	22.9	35.8	33.0	0.6
Housing Units by Geography	884,473	7.0	22.0	37.5	33.1	0.4
Owner-Occupied Units by Geography	506,926	3.5	17.3	39.2	39.8	0.2
Occupied Rental Units by Geography	300,302	13.5	31.0	35.0	19.9	0.6
Vacant Units by Geography	77,245	5.5	17.1	36.5	40.4	0.5
Businesses by Geography	240,100	7.1	23.3	32.9	35.1	1.6
Farms by Geography	5,584	4.5	17.8	38.7	38.1	0.9
Family Distribution by Income Level	542,927	22.6	16.7	19.1	41.5	0.0
Household Distribution by Income Level	807,228	24.2	15.9	17.2	42.8	0.0
Median Family Income MSA - 40900 Sacramento-Roseville-Folsom, CA MSA		\$90,500	Median Housing Value			\$421,343
Median Family Income Non-MSAs - CA		\$70,728	Median Gross Rent			\$1,376
			Families Below Poverty Level			8.5%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i>						
<i>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>						

Sacramento-Roseville-Folsom MSA (Sacramento MSA)

Competition

Competition in the El Dorado County, Placer County, and Sacramento County is high. There are 37 FDIC insured depository institutions with branch operations in the MSA according to the FDIC's June 30, 2022, Deposit Market Share Report. With 21 branches in the AA, EDSB's deposits totaled \$1.7 billion. The bank ranked ninth of 37 depository institutions with 2.4 percent of the deposit market share as of June 30, 2022. The top three depository institutions are Wells Fargo Bank, U.S. Bank, and Bank of America sharing 57.6 percent of total deposits in the AA.

Competition for mortgage lending is very high. According to the Census, there are 691 HMDA-reporting mortgage lenders in this area. EDSB ranked 55th with a market share of 0.37 percent of all HMDA lending in 2022. The top five competitors include United Wholesale Mortgage, Rocket Mortgage, Golden 1 Credit Union, Wells Fargo Bank, and Loandepot.com, LLC sharing 25.4 percent of the market for HMDA reportable loans.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment in the MSA was elevated in 2020 due to impacts of COVID-19. Unemployment declined throughout the evaluation period, returning to pre-pandemic rates in 2022. BLS data indicates the average annual unemployment was 8.5 percent in 2020, 5.9 percent in 2021, and 3.5 percent in 2022.

The largest industries in the AA include Government, education and health services, professional and business services, retail trades, and leisure and hospitality services. The top five employers are University of California, Sutter Health, Kaiser Permanente, Dignity Health, and Intel Corp.

According to the Census, 22.6 percent of families in the AA are low-income and 16.8 percent are moderate-income. The Census indicates that 31.5 percent of the CTs in the AA are low- and moderate-income (LMI) and 27.7 percent of all families in the AA reside in LMI CTs. The percentage of households in the AA living below the poverty level is moderate, representing 11.2 percent, according to the Census. Of total households in the AA living below the poverty line, 17.6 percent and 32.8 percent reside in low-income CTs and moderate-income tracts, respectively.

Housing

Housing in the Sacramento MSA is moderately expensive. Based on the Census, the housing affordability ratio is 6.0, 5.7, and 5.5 in El Dorado County, Placer County, and Sacramento County, respectively. The affordability ratios in the AA are lower than the state ratio of 7.2 and higher than the national ratio of 3.8. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. The elevated affordability ratio indicates a high barrier of entry for LMI individuals to purchase owner-occupied housing in the AA. The American Community Survey (ACS) indicates home ownership in the counties of the AA was 58 percent in Sacramento County, 73.8 percent in Placer County, and 76 percent in El Dorado County. The home ownership rate in each of the counties in the AA is above the state average of 55.6 percent and above the national average of 64.8 percent.

The Census reports 57.3 percent of the total housing units in the AA as owner-occupied, with rental-occupied units at 34 percent and vacant units at 8.7 percent. There are 62,236 housing units in low-income geographies with 28.2 percent of these units being owner-occupied, 65 percent of units are renter-occupied, and 6.8 percent are vacant. There are 194,191 housing units in moderate-income geographies with 45.18 percent of these units being owner-occupied, 48 percent of units are renter-occupied, and 6.8 percent are vacant. The percentage of owner-occupied housing units in low- and moderate-income CTs is lower than in middle- and upper-income geographies.

Community Contact

The OCC utilized community contact information to determine credit needs and challenges in the AA. Community contacts noted challenges for small businesses in qualifying for traditional financing and having access to credit. The contacts indicated a need for smaller loans of \$100,000 or less. There is also a need for affordable housing development and financing within the AA. There are opportunities for financial institutions to provide financial education workshops for LMI individuals and financial assistance to small businesses.

Nevada County

According to the 2015 ACS data, Nevada County consisted of 20 contiguous CTs, which included no low-income CTs, two moderate-income CTs, six middle-income CTs, and 12 upper-income CTs. As a result of the Census data, the AA gained six contiguous CTs with changes that include the addition of one low-income CT, a decrease of two moderate-income CTs, an increase of two middle-income CTs, and an increase of five upper-income CTs.

Competition

Competition in Nevada County is moderate. There are 11 FDIC insured depository institutions with branch operations in the county according to the FDIC's June 30, 2022, Deposit Market Share Report. With two branches, EDSB's deposits totaled \$139.5 million. The bank ranked 7th of 11 depository institutions with 4.5 percent of market share deposits as of June 30, 2022. The top three depository institutions are Wells Fargo Bank, Bank of America, and JPMorgan Chase Bank sharing 57.5 percent of total deposits in the AA.

Competition for mortgage lending is high. There are 328 HMDA-reporting mortgage lenders in this area in 2020. EDSB ranked 49th with a deposit market share of 0.47 percent of all HMDA lending in 2020. The top five competitors include United Wholesale Mortgage, Rocket Mortgage, Home Point Financial Corp., Wells Fargo Bank, and Tri Counties Bank, sharing 24.6 percent of the market for HMDA reportable loans.

Employment and Economic Factors

According to the Bureau of Labor Statistics (BLS), unemployment in the MSA was elevated in 2020 due to impacts of COVID-19. Unemployment declined throughout the evaluation period, returning to pre-pandemic rates in 2022. BLS data indicates the average annual unemployment was 8.2 percent in 2020, 5.7 percent in 2021, and 3.5 percent in 2022. The largest industries in the AA include government, educational and health services, leisure and hospitality, and retail trade. The top employers are Boreal Mountain Resort, Sierra Nevada Memorial Hospital, and Tahoe Forest Hospital District.

According to the Census, 14.8 percent of families in the AA are low-income and 14.2 percent are moderate-income. The Census data indicates that 3.9 percent of the CTs in the AA are low-income, and 2.1 percent of all families in the AA reside in low-income CTs. There are no moderate-income CTs in the AA. The percentage of households in the AA living below the poverty level is moderate, representing 9.4 percent, according to the Census. Of the total households living below the poverty line, 7.4 percent reside in low-income geographies in the AA.

Housing

Housing in the Nevada County is moderately expensive. The ACS estimates an affordability ratio of 7.0 in Nevada County. The affordability ratio in the AA is less than the state ratio of 7.2 and higher than the national ratio of 3.8. The ACS indicates home ownership in the AA to be 74.9 percent which is above the state average of 55.6 percent and the national average of 64.8 percent.

The Census reports 56.8 percent of the total housing units in the AA as owner-occupied, with rental-occupied units at 19.1 percent and vacant units at 24.1 percent. There are 1,311 housing units in low-income geographies with 19.3 percent of these units being owner-occupied, 73.6 percent of units are renter-occupied, and 7.1 percent are vacant. The percentage of owner-occupied units in low-income CTs is significantly lower than in middle- and upper-income geographies.

Community Contacts

The OCC utilized community contact information to determine credit needs and challenges in the AA. The community contact noted a need for banking services to help small businesses purchase real estate or equipment. Community contacts also noted challenges that many small businesses face in qualifying for traditional financing. Opportunities to address credit needs include bank participation in microloans and financing programs for small businesses and start-ups and more outreach.

California Non-MSA AA

According to the 2015 ACS data, the California Non-MSA AA consisted of 36 contiguous CTs, which included no low-income CTs, two moderate-income CTs, 19 middle-income CTs, 13 upper-income CTs, and two CTs without an income classification. As a result of the Census data, the AA gained 12 contiguous CTs that include an increase of six middle-income CTs and an increase seven upper-income tracts. There was no change in low- or moderate-income tracts and tracts without an income classification decreased to one.

The California Non-MSA AA includes the contiguous counties of Amador, Calaveras, and Tuolumne on the western side of the Sierra Mountain Range and the non-contiguous county of Inyo on the eastern side of the range. The U.S. Census estimates the population in the AA to be 160,402 people in 2020-22. The population of the AA declined by 37.8 percent since the 2019 Census.

Demographics

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2020-2021 CA Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	36	0.0	5.6	52.8	36.1	5.6
Population by Geography	154,214	0.0	4.2	53.6	40.1	2.0
Housing Units by Geography	87,078	0.0	4.7	57.2	35.4	2.7
Owner-Occupied Units by Geography	45,082	0.0	3.1	55.1	41.4	0.4
Occupied Rental Units by Geography	16,993	0.0	11.0	59.4	29.3	0.3
Vacant Units by Geography	25,003	0.0	3.2	59.5	28.6	8.6
Businesses by Geography	12,034	0.0	6.7	54.3	38.4	0.6
Farms by Geography	563	0.0	3.0	56.0	40.7	0.4
Family Distribution by Income Level	40,530	17.0	15.4	19.5	48.1	0.0
Household Distribution by Income Level	62,075	20.9	15.0	16.7	47.4	0.0
Median Family Income Non-MSAs - CA		\$56,948	Median Housing Value			\$253,188
			Median Gross Rent			\$976
			Families Below Poverty Level			8.3%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2022 CA Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	48	0.0	4.2	52.1	41.7	2.1
Population by Geography	160,402	0.0	3.9	50.8	43.6	1.7
Housing Units by Geography	87,428	0.0	5.0	52.9	42.1	0.0
Owner-Occupied Units by Geography	46,944	0.0	4.0	53.8	42.2	0.0
Occupied Rental Units by Geography	15,749	0.0	5.1	62.3	32.6	0.0
Vacant Units by Geography	24,735	0.0	6.8	45.4	47.8	0.0
Businesses by Geography	12,918	0.0	3.8	58.6	37.6	0.0
Farms by Geography	634	0.0	4.9	52.7	42.4	0.0
Family Distribution by Income Level	39,962	16.6	16.5	19.6	47.3	0.0
Household Distribution by Income Level	62,693	20.6	14.6	16.8	48.0	0.0
Median Family Income Non-MSAs - CA		\$70,728	Median Housing Value			\$319,492
			Median Gross Rent			\$1,058
			Families Below Poverty Level			6.6%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>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>						

Competition

Competition in the AA is moderate. There are 14 FDIC-insured depository institutions with branch operations in the AA according to the FDIC's June 30, 2022, Deposit Market Share Report. With 10 branches in the AA, EDSB's deposits totaled \$699.3 million, or 17.94 percent of the deposit market as of June 30, 2022. The bank ranks first in deposits out of 14 depository institutions. The top five depository institutions are EDSB, Wells Fargo Bank, Bank of America, Umpqua Bank, and Oak Valley Community Bank. Together, these banks and EDSB account for 68.3 percent of total deposits in the AA.

Competition for mortgage lending is high, as there are 396 HMDA-reporting mortgage lenders in 2022 in the AA. EDSB ranks 19th with a deposit market share of 1.2 percent of all HMDA lending in 2022. No lender has more than 10 percent market share. The top five competitors include Rocket Mortgage, United Wholesale Mortgage, Fairway Independent Mort Corp., Wells Fargo Bank, and American Pacific Mortgage Corp., sharing 27 percent of the market for HMDA reportable loans.

Employment and Economic Factors

According to the BLS, unemployment in the MSA was elevated in 2020 due to impacts of COVID-19. Unemployment declined throughout the evaluation period, returning to pre-pandemic rates in 2022. In Amador County, the BLS data indicates the average annual unemployment was 9.4 percent in 2020, 6.9 percent in 2021, and 4.5 percent in 2022. In Calaveras County, the average annual unemployment was 7.8 percent in 2020, 5.8 percent in 2021, and 3.7 percent in 2022. In Inyo County, the average annual unemployment was 8.1 percent in 2020, 5.9 percent in 2021, and 3.8 percent in 2022. In Tuolumne County, the average annual unemployment was 10.6 percent in 2020, 7.3 percent in 2021, and 4.5 percent in 2022. The largest industries in the AA include government, education and health services, retail trade, and leisure and hospitality. The top employers are the State Corrections Department, Sonora

Regional Medical Center, Jackson Rancheria Casino Resort, Mule Creek State Prison, Preston Youth Correctional, Black Oak Casino Resort, and Dodge Ridge Ski Resort.

According to the Census, 16.6 percent of families in the AA are low-income and 16.5 percent are moderate-income. The Census data indicates that 4.2 percent of the CTs in the AA are moderate-income and 4.8 percent of all families in the AA reside in moderate-income CTs. There are no low-income CTs in the AA. The percentage of households in the AA living below the poverty level is moderate, representing 10.5 percent, according to the Census. About 8.1 percent of households living below the poverty line reside in moderate-income geographies of the AA.

Housing

The Census indicates 53.7 percent of the total housing units in the AA as owner-occupied, with rental-occupied units at 18.0 percent and vacant units at 28.3 percent. There are 4,369 housing units in moderate-income geographies with 43.2 percent of these units being owner-occupied, 18.3 percent of units are renter-occupied, and 38.5 percent are vacant. Opportunities for residential mortgage lending in moderate-income geographies is limited due the low level of housing units in moderate-income tracts compared to total housing units (87,428). The percentage of owner-occupied units in moderate-income CTs is lower than in middle- and upper-income geographies.

Housing in the AA is generally affordable. The 2015 ACS estimates an affordability ratio of 5.5, 5.2, 5.1, and 5.4 in Amador County, Calaveras County, Inyo County, and Tuolumne County, respectively. The affordability ratios in the AA are less than the state's ratio of 7.2 and higher than the national ratio of 3.8. The ACS indicates home ownership in the AA ranged from 66 percent in Inyo County to 82 percent in Calaveras County, compared to California at 55.6 percent and the U.S. at 64.8 percent.

Scope of Evaluation in California

The performance rating in California is based on full-scope reviews of both AAs (Sacramento AA and California Non-MSA AA) in the state. Performance in the Sacramento AA was given greater weight as 68 percent of branches, 71 percent of deposits by dollar volume, and 77 percent of lending by dollar volume in the state are in the Sacramento AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's overall performance, for the purposes of CRA, in the Sacramento AA and California Non-MSA AA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. The bank originated 1,600 home mortgage loans totaling \$397.7 million in its full-scope California AAs between January 1, 2020, and December 31, 2022.

Number of Loans*					2020-2022		
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans **	% State Deposits ***
Sacramento AA	1217	0	0	0	1217	0.37%	2.37%
CA Non-MSA	383	0	0	0	383	1.21%	17.94%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** State Loans taken from HMDA Reporter Market Share as of 12/31/2022

*** State Deposits taken from FDIC report as of 6/30/2022

Dollar Volume of Loans*					2020-2022		
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Sacramento AA	\$316,379	0	0	0	\$316,379	0.37%	2.37%
CA Non-MSA	\$81,356	0	0	0	\$81,356	1.21%	17.94%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Sacramento AA

Lending levels reflect good responsiveness. The bank's deposit market share in the AA is significantly higher than its HMDA loan market share, representing 2.4 percent and 0.4 percent, respectively. There are substantially more lenders and competition for mortgage loans in the AA than deposit taking institutions with 691 lenders and only 37 deposit taking institutions. The top five lenders in the AA make up 26 percent of the market share. The high level of mortgage lenders results in a smaller market share for home mortgages than deposits. However, when considering the market share percentile rank for home mortgages, EDSB's mortgage market share percentile rank exceeds its deposit market share percentile rank. EDSB is within the 92nd percentile for home mortgage loans and the 76th percentile for deposits.

California Non-MSA AA

Lending levels reflect good responsiveness. The bank's market share of deposits in the AA is significantly higher than its HMDA loan market share, representing 17.9 percent and 1.2 percent, respectively. There are substantially more lenders and competition for mortgage loans in the AA than deposit taking institutions with 396 lenders and only 14 deposit taking institutions. The top five mortgage lenders in the AA make up 27 percent of the market share. The level and nature of loan competition results in lower home mortgage market share compared to deposit market share. However, when considering the market share percentile rank for home mortgages, EDSB's mortgage market share percentile rank is comparable to its deposit market share percentile rank, which are 95 percent and 93 percent, respectively.

Distribution of Loans by Income Level of the Geography

Overall, the bank exhibits an adequate geographic distribution of loans, for the purposes of CRA, in its California AAs. Performance in the Sacramento AA is poor and performance in the California Non-

MSA AA is excellent. Weaker performance in the Sacramento AA was somewhat attributed to the high level of competition in the AA.

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.

Sacramento AA

The geographic distribution of home mortgage loans in the Sacramento AA is poor.

During the 2020-2021 evaluation period, the percentage of home mortgage loans originated or purchased in low- and moderate - income geographies was significantly below the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

During the 2022 evaluation period, the percentage of home mortgage loans originated or purchased in low- and moderate - income geographies was below the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

California Non-MSA AA

The geographic distribution of home mortgage loans in the California Non-MSA AA is excellent.

The AA had no low-income CTs throughout the evaluation period.

During the 2020-2021 evaluation period, the percentage of home mortgage loans originated or purchased in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies and exceeded aggregate percentage of all reporting lenders.

During the 2022 evaluation period, the percentage of home mortgage loans originated or purchased in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies and aggregate percentage of all reporting lenders.

Lending Gap Analysis

The review of summary reports and maps reflecting EDSB's home mortgage lending activity over the three-year evaluation period did not identify any unexplained conspicuous gaps, for the purposes of this specific CRA performance evaluation, in the geographic distribution of home mortgage loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels given the product lines offered by the institution. Performance in the Sacramento AA and the California Non-MSA AA is excellent.

Home Mortgage Loans

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

Sacramento AA

The bank's distribution of home mortgage loans by borrower income level within the Sacramento AA is excellent.

During the 2020-2021 evaluation period home mortgage loans to low-income borrowers was below the percentage of low-income families in the AA, but bank performance exceeded the aggregate lending data. The bank's mortgage lending to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and was near to the aggregate lending distribution data.

During the 2022 evaluation period, home mortgage loans to low-income borrowers was below the percentage of low-income families in the AA and exceeded the aggregate lending data. The bank's home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and the aggregate lending data.

California Non-MSA AA

The bank's distribution of home mortgage loans by borrower income level within the California Non-MSA AA is excellent.

During the 2020-2021 evaluation period home mortgage loans to low-income borrowers was below the percentage of low-income families in the AA, but bank performance exceeded the aggregate lending data. The bank's mortgage lending to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and the aggregate lending distribution data.

During the 2022 evaluation period, home mortgage loans to low-income borrowers was below the percentage of low-income families in the AA and exceeded the aggregate lending data. The bank's home mortgage loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and the aggregate lending data.

Community Development Lending

The institution has made few, if any, CD loans.

The Lending Activity tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

EDSB is a residential mortgage lender, and its lending expertise is in single-family residential mortgage lending. While the Bank offers some commercial and agriculture loans, these loans are modest sized loans and secured by the borrower's principal residence.

Product Innovation and Flexibility

The institution makes limited use of flexible lending practices in order to serve AA credit needs. As a portfolio lender, the bank offers underwriting flexibility to otherwise creditworthy applicants and lends on properties that would not be acceptable to investors in the secondary markets. This flexibility is also reflected in the bank's strong performance in lending to LMI borrowers in each AA.

INVESTMENT TEST

The institution’s performance under the Investment Test in California is rated High Satisfactory.

Based on a full-scope review, the institution’s performance in the Sacramento AA and the California Non-MSA AA is good.

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution makes significant use of innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Sacramento AA		0	19	\$145	19	57.60	145	1.27		
California Non-MSA AA		0	6	52	6	18.18	52	0.45		
Broader regional or statewide		1,000	8	11,443	8	24.24	11,443	98.30	5	3,157

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Sacramento AA

EDSB made grants totaling \$144,500 to 19 community development organizations in the Sacramento AA. These organizations primarily serve LMI individuals through community services, revitalization, or stabilization efforts in LMI geographies or the provision of affordable housing.

California Non-MSA AA

EDSB made grants totaling \$30,000 to six community development organizations in the California Non-MSA AA. These organizations primarily serve economic development needs and affordable housing for LMI individuals.

Broader Statewide or Regional Area

The OCC considered the investment opportunities within the AAs, state, and regional areas against the bank’s capacity to address these needs. Given the rural nature of a majority of the EDSB’s AAs, including portions of the Sacramento AA, positive consideration was given to broader statewide or regional activities that had a purpose, mandate, or function to serve one or more of the bank’s AAs, whether or not any of the investment could be directly allocated to an AA.

During this evaluation period, EDSB invested \$11 million in two funds, the WNC Capital Corporation fund and the CRA Qualified Investment Fund. The Sacramento AA directly benefits from the CRA

Qualified Investment Fund. WNC Capital Corporation is the wholly owned subsidiary of WNC & Associates, Inc. and offers tax credit investments to corporations through a national network of stockbrokers and financial advisors. WNC & Associates, Inc. is an affordable housing investment corporation that has business lines spanning affordable housing, Federal Low-Income Housing Tax Credits, New Markets Tax Credits, Historic Tax Credits, and State Tax Credits.

SERVICE TEST

The institution’s performance under the Service Test in California is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s overall performance in the Sacramento AA and California Non-MSA AA is adequate.

Retail Banking Services

Overall, service delivery systems are reasonably accessible, for the purposes of CRA, to geographies and individuals of different income levels in the institution’s California AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Sacramento AA	71.0	21	67.7	0.0	33.3	33.3	33.3	19.6	19.0	18.0	43.5
CA Non-MSA AA	29.0	10	32.3	0.0	10.0	70.0	20.0	19.6	16.0	23.8	40.6

Distribution of Branches

Sacramento AA

EDSB operates 21 branch offices within this AA. EDSB does not maintain any branches within low-income CTs. During the most recent census, five CTs containing branches in the Sacramento AA moved from middle-income to moderate-income. Two CTs shifted from upper-income to middle-income. The Sacramento Assessment Area distribution percentages improved slightly after the CT changes. The proportion of AA branches in moderate-income geographies exceeds the portion of the moderate-income population living in the AA.

California Non-MSA AA

EDSB's branches are reasonably accessible to geographies and individuals of different income levels in the California Non-MSA AA. EDSB operates ten branches within the AA. One branch is located within a moderate-income tract. After the Census updated the tracts, the proportion of AA branches in moderate-income geographies in the California Non-MSA AA is below the percentage of the population in moderate-income CTs.

While the AA does not have any low-income CTs, five of its branch locations serve middle-income CTs where more than one-third of the families in the tract are designated as LMI. The one branch in a moderate-income tract in that AA serves a population that has more than one-third of families who are low-income.

Alternative Delivery Systems

For the purposes of CRA, the overall accessibility and use of alternative systems for delivering retail banking services in LMI geographies and to LMI individuals in the California AAs is good. EDSB's full-service branches offer automated teller machines (ATM). Customers have access through Visa Check Cards for point-of-sale purchases at Star and Interlink terminals. Customers can also withdraw cash at non-EDSB ATMs with Cirrus, Star, or Visa Symbols, for a minimal fee. EDSB offers 24-hour access to accounts through telephone and online banking for account information. Internet and mobile banking capabilities include fund transfers between accounts, bill pay, and account opening.

Changes in Branch Locations

The bank did not open or close branches in either AA during the evaluation period.

Reasonableness of Services and Hours of Operations

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.

EDSB offers traditional savings and deposit products and provides money orders, travelers checks, and safe deposit boxes. EDSB offers low-cost and low-minimum balance checking and savings accounts that are affordable to LMI customers, seniors, and custodial accounts for minors.

Hours at branches are uniform during weekdays, with branches offering 9:00 AM - 5:00 PM Monday through Thursday, and Friday 9:00 AM - 6:00 PM. Eleven California branches offer drive-up services. Drive-up hours are 8:30 AM - 5:00 PM Monday through Thursday, and Friday 8:30 AM - 6:00 PM. All branches offer ATM services. Thirty out of the 31 California branches offer merchant night drop services.

Sacramento AA

Eight branches offer drive-up hours and access. Two of these branches are in moderate-income census tracts. Twenty branches offer merchant night drop services. Sixteen branches offer safe deposit boxes. All branches in the AA offer ATM Services. There are no branches with weekend hours.

California Non-MSA AA

Three branches offer drive-up hours and access, including the one branch located in a moderate-income CT. Ten branches offer merchant night drop services, including the one branch located in a moderate-

income CT. Seven branches offer safe deposit boxes, including the one branch located in a moderate-income CT. There are no branches with weekend hours.

Community Development Services

The institution provides a low level of CD services. During the evaluation period, a senior banking officer volunteered approximately 500 hours at a local non-profit hospital that provides focused care for LMI individuals in El Dorado County. In addition, another banking officer volunteered almost 70 hours at another non-profit hospital in El Dorado County, which provides free or low-cost hospital services to LMI individuals.

Disaster Response: COVID-19 and Caldor Fire

The institution provided disaster relief in the form of loan forbearance programs involving six months of interest only payments. During COVID-19, 116 loans participated in the initial six-month program. Additional six-month forbearance terms were offered as needed, with 19 loans requesting a second forbearance, and five loans requesting a third. All participating loans have now resumed normal payment schedules and 13 have been paid off. A similar forbearance program was offered to any customer affected by the Caldor Fire in August through October 2021. One loan customer participated in this program and has since returned to normal payments.

State of Nevada

CRA rating for the State of Nevada: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Needs to Improve
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels, for the purposes of CRA and based on the data contained in the tables listed in this section, reflect good responsiveness to AA needs.
- An excellent distribution of loans, for the purposes of CRA and based on the data contained in the tables listed in this section, in geographies of different income levels.
- An adequate distribution of loans, for the purposes of CRA and based on the data contained in the tables listed in this section, among individuals of different income levels.
- A low level of CD investments that are responsive to AA needs.
- Retail delivery systems are reasonably accessible, for the purposes of CRA, to geographies and individuals in the AA.

Description of Institution's Operations in Nevada

As of June 30, 2022, EDSB had four branch offices serving Nevada. EDSB reported total deposits of \$161.2 million in these offices, which represented 6.3 percent of total deposits. The branches are full-service, offering the full range of EDSB's loan and deposit products. EDSB is primarily a home mortgage lender. The number and dollar volume of loans granted by EDSB within the state of Nevada represented approximately 4.3 percent and 4.5 percent, respectively, of the bank's total reportable lending.

Reno AA

The Reno AA has seen a growth in the number of CTs from 129 in 2020-2021 to 156 in 2022. According to the 2015 ACS, the Reno AA includes 129 CTs surrounding the bank's four full-service branches located in Washoe and Douglas Counties. The AA includes 10 low-income, 21 moderate-income, 50 middle-income, and 40 upper-income CTs. In addition, there are eight CTs that do not report data and are listed as unknown. As a result of the Census, this AA gained 27 CTs since the last evaluation with changes being an increase of two low-income CTs, an increase of nine moderate-income CTs, an increase of five middle-income CTs, an increase of six upper-income CTs, and an increase of five unknown CTs. Over the same timeframe, the median income within the AA increased significantly from \$65,722 in 2020-2021 to \$84,215 in 2022. Additionally, the median housing value increased from \$232,542 in 2020-2021 to \$375,351 in 2022.

Based on branch locations, EDSB serves a portion of the Reno-Carson City-Fernley CSA (Reno AA). The bank's Reno AA covers the Washoe County portion of the Reno-Sparks MSA and the Gardnerville Ranchos Micropolitan Area (Douglas County). As of July 1, 2022. The Census estimates the population

in Douglas and Washoe Counties to be 49,488 and 486,492 respectively. The population of the AA grew by 3 percent since the 2015 ACS Census.

Demographics

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2020-2021 Reno CSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	129	7.8	16.3	38.8	31.0	6.2
Population by Geography	482,278	7.8	17.6	43.3	30.0	1.2
Housing Units by Geography	210,191	8.7	18.0	40.8	31.5	1.0
Owner-Occupied Units by Geography	108,205	2.4	11.5	45.1	40.7	0.3
Occupied Rental Units by Geography	77,919	16.8	27.3	38.3	16.0	1.7
Vacant Units by Geography	24,067	11.0	17.0	29.9	40.1	2.1
Businesses by Geography	33,866	8.0	21.4	30.6	35.3	4.7
Farms by Geography	840	5.6	13.7	41.2	38.3	1.2
Family Distribution by Income Level	116,402	20.7	17.1	20.8	41.4	0.0
Household Distribution by Income Level	186,124	24.1	15.7	17.7	42.5	0.0
Median Family Income MSA - 39900 Reno, NV MSA		\$65,722	Median Housing Value			\$232,542
Median Family Income Non-MSAs - NV		\$61,350	Median Gross Rent			\$954
			Families Below Poverty Level			9.8%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2022 Reno CSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	156	7.7	19.2	35.3	29.5	8.3
Population by Geography	535,980	7.3	20.2	38.9	31.2	2.5
Housing Units by Geography	225,971	8.2	19.7	38.1	31.3	2.7
Owner-Occupied Units by Geography	123,420	2.3	13.1	42.2	41.3	1.1
Occupied Rental Units by Geography	83,767	16.7	30.8	33.3	14.6	4.7
Vacant Units by Geography	18,784	8.6	13.9	32.9	40.2	4.3
Businesses by Geography	52,400	4.7	22.1	30.4	35.0	7.7
Farms by Geography	1,071	3.2	13.4	41.2	38.7	3.6
Family Distribution by Income Level	130,815	19.7	18.1	22.0	40.2	0.0
Household Distribution by Income Level	207,187	22.2	16.5	18.7	42.6	0.0
Median Family Income MSA - 39900 Reno, NV MSA		\$84,215	Median Housing Value			\$375,351
Median Family Income Non-MSAs - NV		\$75,373	Median Gross Rent			\$1,180
			Families Below Poverty Level			6.2%
<i>Source: 2020 U.S. Census and 2022 D&B Data Due to rounding, totals may not equal 100.0% (* The NA category consists of geographies that have not been assigned an income classification.</i>						

Washoe County

Competition

Competition in Washoe County is moderate. There are 17 FDIC insured depository institutions with branch operations in the county according to the FDIC June 30, 2022, Deposit Market Share Report. With one branch in the county, EDSB's deposits totaled \$20.4 million. The bank ranked 16th of 17 depository institutions with 0.1 percent of the deposit market share as of June 30, 2022. The top three depository institutions are Wells Fargo Bank, Bank of America, and U.S. Bank, sharing 64.9 percent of total deposits in the county.

Competition for mortgage lending is high. There are 382 HMDA-reporting mortgage lenders in this area in 2022. EDSB ranked 176th with a market share of 0.04 percent of all HMDA-lending in 2022. The top five competitors include Guild Mortgage Company, Rocket Mortgage, U.S. Bank, United Federal Credit Union, and Wells Fargo Bank sharing 24.4 percent of the market share of HMDA-reportable loans.

Employment and Economic Factors

According to the BLS, unemployment in Washoe County improved during the evaluation period. BLS data indicates the average annual unemployment was 8.4 percent in 2020, 4 percent in 2021, and 3.4 percent in 2022. According to the BLS, the largest industries in the AA include trade, transportation, utilities, leisure and hospitality services, and government. According to the Nevada Department of Employment, Training and Rehabilitation (DETR), the top five employers are Renown Health,

Peppermill Inc, Nugget Casino Resort, Grand Sierra Resort & Casino, and St Mary's Regional Medical Center.

According to the Census, 20.3 percent of families in the AA are low-income and 18.2 percent are moderate-income. The Census indicates that 30.2 percent of the CTs in the AA are LMI and 27.4 percent of all families in the AA reside in LMI CTs. The percentage of households in the AA living below the poverty level is moderate, representing 10.4 percent, according to the Census. Of total households in the AA living below the poverty line, 20 percent and 32.9 percent reside in low-income and moderate-income CTs, respectively.

Housing

Housing in Washoe County is moderately expensive. The Census estimates an affordability ratio of 5.6 in Washoe County. The affordability ratio in the AA is higher than the state ratio of 5.2 and the national ratio of 3.8. The Census indicates home ownership in the AA is 58.6 percent. Home ownership in the AA is above the state average of 58.4 percent but below the national average of 64.8 percent.

The Census reports 53.5 percent of the total housing units in the AA as owner-occupied, with rental-occupied units at 38.9 percent and vacant units at 7.6 percent. There are 18,417 housing units in low-income geographies with 15.4 percent of these units being owner-occupied, 75.9 percent of units are renter-occupied, and 8.8 percent are vacant. There are 44,484 housing units in moderate-income geographies with 36.3 percent of these units being owner-occupied, 57.8 percent of units are renter-occupied, and 5.9 percent are vacant. The percentage of owner-occupied units in LMI CTs is significantly lower than in middle- and upper-income geographies.

Douglas County

Competition

Competition in Douglas County is low. There are eight FDIC-insured depository institutions with branch operations in the county according to the FDIC June 30, 2022, Deposit Market Share Report. With three branches in the county, EDSB's deposits totaled \$140.8 million. The bank ranked fourth of eight depository institutions with 7.1 percent of the deposit market share as of June 30, 2022. The top three depository institutions are Bank of America, Wells Fargo Bank, and U.S. Bank sharing 74.1 percent of total deposits in the county.

Competition for mortgage lending is moderate. There are 203 HMDA-reporting mortgage lenders in this area in 2022. EDSB ranked 46th with a market share of 0.5 percent of all HMDA-lending in 2022. The top five competitors include Guild Mortgage Company, Greater Nevada Mortgage Company LLC, Rocket Mortgage, U.S. Bank, and Wells Fargo Bank, sharing 31.4 percent of the market for HMDA reportable loans.

Employment and Economic Factors

According to the BLS, unemployment in Douglas County improved during the evaluation period. BLS data indicates the average annual unemployment was 9.3 percent in 2020, 4.3 percent in 2021 and 3.9 percent in 2022. According to the BLS, the largest industries in the AA include trade, transportation/utilities, leisure and hospitality services, and government. According to the Nevada DETR, the top five employers are Harrah's Lake Tahoe, MontBleu Resort Casino and Spa, Walmart Supercenter, Edgewood Tahoe Golf Course, and Carson Valley Inn Casino.

According to the Census, 14.9 percent of families in the AA are low-income and 17.6 percent are moderate-income. The Census indicates that there are no low- or moderate-income CTs in the AA. The percentage of households in the AA living below the poverty level is moderate, representing 7.2 percent, according to the Census. Of total households in the AA living below the poverty line, none reside within the low- or moderate-income CTs.

Housing

Housing in Douglas County is moderately expensive. The Census estimates an affordability ratio of 6.3 in the county. The affordability ratio in the county is higher than the state ratio of 5.2 and the national ratio of 3.8. The Census indicates home ownership in the AA to be 76.7 percent, which is above the state average of 58.4 percent and the national average of 64.8 percent.

The Census reports 63.9 percent of total housing in the AA is owner-occupied, with rental-occupied units at 21.9 percent and vacant units at 14.2 percent. There are no longer any housing units within the low-income and moderate-income CTs as the only moderate-income tract was reclassified since the prior examination.

Community Contacts

The OCC utilized community contact information to determine credit needs and challenges in the AA. Community contacts indicated a need for affordable housing and alternative lending, such as micro-loans/grants. Opportunities for banks to address credit needs include small business loans, loans for start-ups, and financing for housing projects and infrastructure improvements.

Scope of Evaluation in Nevada

The performance rating in Nevada is based on a full scope review of the Reno AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEVADA

LENDING TEST

The bank's performance under the Lending Test in Nevada is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance, for the purposes of CRA, in the Reno AA is adequate.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. The bank originated 78 home mortgage loans totaling \$18.5 million in this AA between January 1, 2020, and December 31, 2022.

Number of Loans*					2020-2022		
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Reno AA	78	0	0	0	78	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*					2020-2022		
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Reno AA	\$18,515	0	0	0	\$18515	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The bank's deposit market share in the AA is significantly higher than its HMDA loan market share, representing 0.9 percent and 0.1 percent, respectively. There are substantially more lenders and competition for mortgage loans in the AA than deposit taking institutions with 391 mortgage lender and only 17 deposit taking institutions. The top five mortgage lenders in the AA made up 25 percent of the market share in 2022. The high level of mortgage lenders results in a smaller market share for home mortgages than deposits. However, when considering the market share percentile rank for home mortgages, EDSB's mortgage market share percentile rank exceeds its deposit market share percentile rank, representing the 66th percentile and 29th percentile, respectively.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans, for the purposes of CRA, in the Reno AA.

Home Mortgage Loans

Refer to Table O in the state of Nevada 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.

During the 2020-2021 evaluation period, the percentage of home mortgage loans originated or purchased in moderate - income geographies was below the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders. The bank made no loans in low-income CTs.

During the 2022 evaluation period, the bank made no loans in low-income CTs. The percentage of home mortgage loans originated or purchased in moderate-income geographies was near to the percentage of owner-occupied housing units located in those geographies and the aggregate percentage of all reporting lenders.

Lending Gap Analysis

The review of summary reports and maps reflecting EDSB's home mortgage lending activity over the evaluation period did not identify any unexplained conspicuous gaps, for the purposes of this specific CRA performance evaluation, in the geographic distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

During the 2020-2021 evaluation period home mortgage loans to low-income borrowers was below the percentage of low-income families in the AA, but bank performance exceeded the aggregate lending data. The bank's mortgage lending to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and the aggregate lending distribution data.

During the 2022 evaluation period home mortgage loans to low-income borrowers was below the percentage of low-income families in the AA, but bank performance was equal to the aggregate lending data. The bank's mortgage lending to moderate-income borrowers exceeded the percentage of moderate-income families in the AA and the aggregate lending distribution data.

Community Development Lending

The institution has made few, if any, CD loans in the Reno AA. During the evaluation period, EDSB did not grant any CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

EDSB is a residential mortgage lender, and its lending expertise is in single-family residential mortgage lending. While the bank offers some commercial and agriculture loans, these loans are modest sized loans and secured by the borrower's principal residence.

Product Innovation and Flexibility

The institution makes limited use of flexible lending practices in order to serve AA credit needs. As a portfolio lender, the bank offers underwriting flexibility to otherwise creditworthy applicants and lends on properties that would not be acceptable to investors in the secondary markets.

INVESTMENT TEST

The bank's performance under the Investment Test in Nevada is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Reno AA is poor.

The institution has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The institution has a poor level of qualified CD investments and grants, particularly those that are not routinely provided by private investors but rarely in a leadership position. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution makes limited use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Reno AA	0	0	5	36	5	100	36	100	0	0

* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

EDSB made grants totaling \$36,000 to five community development organizations in the AA. These organizations primarily serve the needs of LMI individuals through social services.

SERVICE TEST

The bank's performance under the Service Test in Nevada is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Reno AA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible, for the purposes of CRA, to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Reno AA	100.00	4	100.00	0.0	25.0	75.0	0.0	7.7	19.2	35.3	29.5

Distribution of Branches

EDSB operates four branches within this AA. EDSB does not maintain any branches within a low-income CT. However, there is one branch located in a moderate-income CT. The branch in the moderate-income CT is located in Washoe County. The other three branches are in middle-income CTs in Douglas County. It should be noted that as of the Census, Douglas County does not contain any low- or moderate-income CTs.

Alternative Delivery Systems

For the purposes of CRA, the accessibility and use of alternative delivery systems for delivering retail banking services in LMI geographies and to LMI individuals is good. All four of the branches operated by EDSB in the state of Nevada are full-service branches offering ATM, merchant night drop, and safe deposit boxes. Each branch has the same operating hours. Each branch also has a drive-up teller window.

Changes in Branch Locations

The bank did not open, close, or relocate any of the branches in the state of Nevada during the evaluation period.

Reasonableness of Services and Hours of Operations

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.

EDSB offers traditional savings and deposit products and provides money orders, travelers checks, and safe deposit boxes. EDSB offers low-cost and low-minimum balance checking and savings accounts that are affordable to LMI customers, seniors, and custodial accounts for minors.

Hours at all four branches are uniform during weekdays, with branches offering 9:00 AM - 5:00 PM Monday through Thursday, and Friday 9:00 AM - 6:00 PM. All four branches offer drive up services. Drive up hours are 8:30 AM - 5:00 PM Monday through Thursday, and Friday 8:30 AM - 6:00 PM. Each of the branches offer ATM services and merchant night drop services.

Community Development Services

The institution provides few if any CD services. EDSB did not provide any CD services in the Reno AA during the evaluation period.

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:	01/01/2020 – 12/31/2022	
Bank Products Reviewed:	Home mortgage, Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State		
California		
Sacramento-Roseville CSA AA	Full-Scope	Counties of El Dorado, Placer, Sacramento, and Nevada
California Non-MSA AA	Full-Scope	Counties of Amador, Calaveras, Inyo and Tuolumne
Nevada		
Reno-Carson City-Fernley CSA AA	Full-Scope	Counties of Douglas and Washoe

Appendix B: Summary of MMSA and State Ratings

RATINGS EL DORADO SAVINGS BANK, F.S.B.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
El Dorado Savings Bank, FSB	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
MMSA or State:				
California	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Nevada	High Satisfactory	Needs to Improve	Low Satisfactory	Satisfactory

()The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.*

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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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 loans are treated the same 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 P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

California

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21
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 Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
CA Non-MSA AA	313	65,055,920	25.0	12,032	0.0	0.0	0.0	3.1	2.9	2.1	55.1	62.6	53.1	41.4	32.9	42.7	0.4	1.6	2.2
Sacramento AA	937	234,708,717	75.0	173,336	4.5	1.8	5.1	17.8	7.9	16.2	35.0	38.2	31.7	42.7	52.1	46.9	0.0	0.0	0.1
Total	1,250	299,764,637	100.0	185,368	4.1	1.4	4.8	16.5	6.6	15.3	36.8	44.3	33.1	42.6	47.3	46.6	0.1	0.4	0.2

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 EL DORADO SAVINGS BANK, FSB excluded from Aggregate.*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022
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 Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
CA Non-MSA AA	70	16,300,441	20.0	5,783	0.0	0.0	0.0	4.0	2.9	4.1	53.8	65.7	47.2	42.2	31.4	48.7	0.0	0.0	0.0
Sacramento AA	280	82,369,940	80.0	75,848	3.5	1.4	4.0	17.3	12.1	17.7	39.2	44.3	34.5	39.8	41.4	43.6	0.2	0.7	0.2
Total	350	98,670,381	100.0	81,631	3.2	1.1	3.7	16.2	10.3	16.8	40.4	48.6	35.4	40.0	39.4	44.0	0.2	0.6	0.2

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 EL DORADO SAVINGS BANK F.S.B. excluded from Aggregate.*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
CA Non-MSA AA	313	65,055,920	25.0	12,032	17.0	5.4	2.4	15.4	20.8	9.5	19.5	19.2	18.9	48.1	53.0	53.8	0.0	1.6	15.5	
Sacramento AA	937	234,708,717	75.0	173,336	23.4	8.1	4.1	16.1	15.9	13.4	18.4	22.7	22.3	42.1	49.3	45.3	0.0	3.9	14.9	
Total	1,250	299,764,637	100.0	185,368	22.9	7.4	4.0	16.1	17.1	13.1	18.5	21.8	22.1	42.5	50.2	45.9	0.0	3.4	14.9	

Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 EL DORADO SAVINGS BANK, FSB excluded from Aggregate.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
CA Non-MSA AA	70	16,300,441	20.0	5,783	16.6	14.3	4.1	16.5	17.1	11.4	19.6	28.6	20.6	47.3	38.6	51.8	0.0	1.4	12.1	
Sacramento AA	280	82,369,940	80.0	75,848	22.6	11.4	4.8	16.7	18.6	13.2	19.1	21.1	21.8	41.5	47.9	46.4	0.0	1.1	13.8	
Total	350	98,670,381	100.0	81,631	22.2	12.0	4.7	16.7	18.3	13.0	19.1	22.6	21.8	41.9	46.0	46.8	0.0	1.1	13.7	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 EL DORADO SAVINGS BANK, FSB excluded from Aggregate.

Nevada

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-21	
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 Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Reno AA	62	13,913,550	100.0	40,484	2.4	0.0	2.0	11.5	6.5	9.1	45.1	53.2	45.3	40.7	40.3	43.3	0.3	0.0	0.3	
Total	62	13,913,550	100.0	40,484	2.4	0.0	2.0	11.5	6.5	9.1	45.1	53.2	45.3	40.7	40.3	43.3	0.3	0.0	0.3	

Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 EL DORADO SAVINGS BANK, FSB excluded from Aggregate.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022	
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 Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Reno CSA AA	16	4,601,000	100.0	17,753	2.3	0.0	1.9	13.1	12.5	12.4	42.2	43.8	41.4	41.3	43.8	43.1	1.1	0.0	1.1	
Total	16	4,601,000	100.0	17,753	2.3	0.0	1.9	13.1	12.5	12.4	42.2	43.8	41.4	41.3	43.8	43.1	1.1	0.0	1.1	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 EL DORADO SAVINGS BANK, FSB excluded from Aggregate.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Reno AA	62	13,913,550	100.0	40,484	20.7	12.9	5.0	17.1	22.6	15.9	20.8	21.0	22.3	41.4	37.1	40.8	0.0	6.5	16.0	
Total	62	13,913,550	100.0	40,484	20.7	12.9	5.0	17.1	22.6	15.9	20.8	21.0	22.3	41.4	37.1	40.8	0.0	6.5	16.0	

Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 EL DORADO SAVINGS BANK, FSB excluded from Aggregate.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Reno CSA AA	16	4,601,000	100.0	17,753	19.7	6.3	6.3	18.1	25.0	14.7	22.0	31.3	21.5	40.2	37.5	42.3	0.0	0.0	15.3	
Total	16	4,601,000	100.0	17,753	19.7	6.3	6.3	18.1	25.0	14.7	22.0	31.3	21.5	40.2	37.5	42.3	0.0	0.0	15.3	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%
 EL DORADO SAVINGS BANK, FSB excluded from Aggregate.