



MISSION VALLEY BANK

**COMMUNITY REINVESTMENT ACT  
2021-2025 STRATEGIC PLAN**

**TABLE OF CONTENTS**

**I. LETTER FROM THE CEO ..... 1**

**II. ABOUT US..... 3**

A. MAIN OFFICE INFORMATION ..... 3

B. BACKGROUND ..... 3

C. OUR VISION AND MISSION ..... 4

D. STRATEGIES AND TACTICS ..... 5

**III. CRA PROGRAM GOVERNANCE..... 5**

A. BOARD AND CRA COMMITTEE GOVERNANCE..... 5

B. BOARD OF DIRECTORS AUDIT COMMITTEE..... 6

C. EXECUTIVE COMMITTEE ..... 6

D. CRA OFFICER/CRA COMMITTEE ..... 7

**IV. MEASUREABLE GOALS FOR CRA LENDING, INVESTMENT AND SERVICE..... 7**

**V. PRODUCTS..... 7**

A. CREDIT PRODUCTS ..... 8

B. SBA LOANS ..... 8

C. DEPOSIT PRODUCTS..... 9

D. LENDING AND DEPOSIT PRODUCT FOCUS..... 9

**VI. COMPETITION ..... 9**

A. COUNTY COMPETITION ..... 9

B. LOCAL COMPETITION ..... 10

C. SBA LOAN COMPETITION ..... 11

D. MISSION VALLEY BANK HISTORICAL CRA PERFORMANCE EVALUATION ..... 12

E. MISSION VALLEY BANK’S STRATEGIC PLAN: OVERALL GOALS, EFFECTIVE DATE AND TERM..... 13

**VII. PLAN EFFECTIVE DATE ..... 13**

**VIII. HISTORICAL PERFORMANCE – SMALL BUSINESS LOANS ..... 15**

A. LENDING INSIDE AND OUTSIDE OF THE BANK’S ASSESSMENT AREA ..... 15

B. LENDING INSIDE THE AA AS A PERCENTAGE OF AVERAGE ASSETS ..... 16

C. GEOGRAPHIC DISTRIBUTION FOR SMALL BUSINESS LOANS ..... 16

**IX. MEASURABLE GOALS ..... 17**

**X. PERFORMANCE GOALS – SMALL BUSINESS LENDING..... 17**

A. TARGETED NEED ..... 18

B. LENDING ACTIONS..... 19

C. LENDING CHANNELS ..... 20

**XI. PERFORMANCE GOALS - COMMUNITY DEVELOPMENT LOANS AND INVESTMENTS ..... 20**

**XII. GOALS AND STANDARDS - QUALIFIED COMMUNITY DEVELOPMENT GRANTS ..... 21**

**XIII. PERFORMANCE GOALS - COMMUNITY DEVELOPMENT SERVICES ..... 27**

**XIV. COMMUNITY COMMITMENT & SOCIAL IMPACT ..... 29**

<b>XV. PUBLIC PARTICIPATION IN DEVELOPMENT OF THE PLAN .....</b>	<b>29</b>
<b>XVI. NOTICE REGARDING PUBLIC INSPECTION OF THE PLAN.....</b>	<b>30</b>
<b>XVII. SATISFACTORY AND OUTSTANDING GOALS .....</b>	<b>31</b>
<b>XVIII. ONGOING REVIEW OF PERFORMANCE GOALS AND STANDARDS .....</b>	<b>32</b>
<b>XIX. ELECTION OF ALTERNATIVE PERFORMANCE EVALUATIONS .....</b>	<b>32</b>
<b>XX. REQUEST FOR APPROVAL .....</b>	<b>32</b>
ASSESSMENT AREA MAP .....	33
SOUTH BAY LOAN PRODUCTION OFFICE .....	34
PROOF OF PUBLICATION – THE DAILY NEWS, LA COUNTY .....	35
PROOF OF PUBLICATION – MISSIONVALLEYBANK.COM .....	36

## I. LETTER FROM THE CEO

The Community Reinvestment Act of 1977 ("CRA"), was created to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods. Our community, also known as our assessment area, encompasses the markets around our full-service branches, or the markets around our loan production office.

Neither the CRA, nor its implementing regulations, give specific criteria required of depository institutions toward meeting the credit needs of their assessment area. Rather, the law indicates that the process for meeting CRA obligations should accommodate an institution's individual circumstances.

The CRA regulation contains an option for banks called the "strategic plan". This option allows an institution to develop a plan, with community input, detailing how the institution proposes to meet its CRA obligations. The plan is tailored to the needs of the community using direct community input at the development stage. The institution informally seeks suggestions from the public while developing the plan and once developed it must publish notice of the plan and solicit written public comment for at least 30 days. After the comment period, the institution submits the plan to its regulator for review and approval.

Mission Valley Bank is an active lender to small businesses throughout Southern California, granting over \$39 million in small business loans during 2019. In addition to its branches, the Bank currently has one loan production office outside of its assessment area which will add the ability of the Bank to meet the needs of small businesses in that area. As such, the amount of lending inside our assessment area, as opposed to outside our assessment area represents adequate penetration.

Although, currently, lending inside our assessment area is more than 50% of our overall lending, the Strategic Plan for Mission Valley Bank could eventually cause small business lending inside our assessment area to be less than 50%. Therefore, to ensure the Bank meets its responsibilities under the CRA, the Bank is implementing this CRA Strategic Plan (the "Plan").

The Plan covers the five years from January 1, 2021 through December 31, 2025 and sets specific benchmarks for the Bank to achieve to help meet the needs of our community through lending, investment, and activity goals.

The Plan will include working in partnerships with community organizations to ensure the needs of small businesses are being met, along with the revitalization of low- and moderate-income areas within our assessment area. We will achieve this by promoting the availability of small business loans, financial education, community investments and service.

To develop the Plan, management took the following steps:

- We evaluated the Bank, including the current business model, relevant financial information, business strategy, products, performance context and competitive environment.
- We considered assessment area demographic information and economic conditions.
- We then assessed the community development and credit needs of our community. During this phase of development, we evaluated various resource material and interviews with, or presentations from, representatives of community development agencies.
- Finally, we developed the strategic goals for the Bank's lending, investment, and service activities. The goals are responsive to the needs of the community and appropriate within the Bank's performance context.

We also believe the Bank's assessment area is appropriately delineated. The assessment area consists of 2 Census County Divisions, Newhall, CA, and San Fernando Valley. The assessment area includes the census tracts where our branch offices are located and does not arbitrarily exclude low- and moderate-income areas.

We at Mission Valley Bank are committed to providing answers to the needs of the communities served by the Bank, the executive management and/or members of the CRA Committee continually meet with local community development organizations; state, county and local government departments and agencies; and other organizations and agencies to identify specific needs and programs to discuss the credit and banking needs of low and moderate income persons, families and communities.

We invite your comments relating to our Plan. Individuals with questions or comments may contact us at:

Mission Valley Bank  
9116 Sunland Boulevard  
Sun Valley, CA 91352  
Attention: Tamara Gurney, President & CEO  
Phone: (818) 394-2300  
Email: [TGurney@MissionValleyBank.com](mailto:TGurney@MissionValleyBank.com)>



Tamara Gurney  
President and CEO  
Mission Valley Bank

## **II. ABOUT US**

### **A. Main Office Information**

Mission Valley Bank's (Bank) corporate headquarters is located at 9116 Sunland Blvd., Sun Valley, CA 91352. The Bank has a full-service retail branch located at 9116 Sunland Blvd., Sun Valley, CA 91352, and a full-service branch at 26415 Carl Boyer Drive, Suite 120 Santa Clarita, CA 91350. All branches are open from 9:00 a.m. until 4:00 p.m., Monday through Friday.

### **B. Background**

Mission Valley Bank (MVB and Bank) is an independent community business bank with a rich history of supporting the deposit and credit needs of small to medium sized businesses and commercial property owners in the San Fernando Valley and Santa Clarita Valley communities.

Mission Valley Bank is a community Bank opened in July 2001 to provide local communities with the caliber of personal service banking that had been lost through a continuum of mergers and acquisitions in the marketplace. The Bank operates two full-service, brick and mortar branches in Sun Valley and Santa Clarita, California and one loan production office (LPO) in Torrance, California. All three are located in the county of Los Angeles.

Bank organizers and founders are comprised of local business individuals and bankers who have worked in—and served—the Bank's community for more than 30 years. The Bank recognizes the importance of developing and building strong affiliations within the community and responding promptly and accurately to every client's needs and the needs of the community in which it serves.

The Bank's service philosophy is based on knowing Bank clientele, responding to their unique financial needs, and working to earn the role as a Trusted Advisor. Familiarity with local industries, an ability to make decisions locally, and providing a staff that is well known by individuals and businesses in the area serves as the foundation from which the Bank builds its success.

The Bank is a California State chartered Bank, regulated by the California Department of Business Oversight (DBO) and by the Federal Deposit Insurance Corp. (FDIC), who insures our deposits up to the amount allowable by law.

The Bank focuses on providing loans to small businesses to buy, construct, and/or refinance commercial real estate that houses their business (owner-occupied properties), through the U.S. Government's Small Business Administration ("SBA") lending programs.

To fund loans, the Bank focuses on obtaining deposits from local businesses and individuals in the markets around our branches.

For the year ended December 31, 2019, the Bank's Report of Condition and Income (Call Report) filed with the FDIC, reported total assets of \$355 million, total loans (Gross) of \$266 million, total deposits of \$306 million, and equity capital of \$42 million. The Bank is designated as "well-capitalized", the highest designation for capital levels given by the FDIC. As of December 31, 2019, the Bank's Tier 1 Capital Ratio was 14.3%, and its total risk-based capital ratio was 15.5%, substantially above the well-capitalized benchmarks of 8.0% and 10.0%, respectively.

## C. Our Vision and Mission

*It is the Bank's mission to serve the credit needs of low-and moderate-income people, geographies, small businesses, and community development organizations within its CRA Assessment Area in a manner that is consistent with safe, sound, and prudent banking practices and within the Bank's capacity. To accomplish this, the Bank continuously evaluates its products and services in light of its CRA Plan in order to determine whether they support the enhancement of the economic vitality of the communities it serves. It is the Bank's commitment to offer added value in every customer relationship. The Bank believes this philosophy, coupled with an experienced and dedicated team of banking professionals, will result in continued growth in local businesses and a successful bank that supports an exceptional community.*

To maximize efforts, the Bank ensures that products and services are responsive to the needs of the entire community, including low and moderate income (LMI) areas and individuals. Our mission will focus on:

- Developing innovative loan products, including a Quick Qualifier Program targeted to low- to moderate income areas within the Bank's AA that are designed to meet the needs of the communities and small businesses served by the Bank
- Growing SBA loan volume year over year
- Loan products that consider affordable housing and community development needs of small businesses particularly those with Gross Annual Revenues of less than \$1MM
- New products and services that are developed, working with community-based organizations remaining responsive to the credit needs of LMI families and geographies and yet meeting the Bank's prudent underwriting standards
- Working with local community-based organizations to identify opportunities for the Bank to participate in community development loans, investments and services that help support or meet the community development needs in our assessment area
- Working with organizations that offer innovative loan products that are targeted to LMI persons and geographies, along with small businesses
- Working with local community-based organizations to identify opportunities for the Bank to participate in investments for community development service expectations for the Bank's branches, encouraging staff and executives to participate with community partners.
- Making small businesses and LMI individuals aware of the services available for them at Mission Valley Bank. In order to ensure this, the Bank will:
  - Market our products and services throughout the Bank's market areas;
  - Target marketing to reach traditionally underserved segments within the communities the Bank serves and to Low-Moderate income tracts inside the Bank's assessment area; and
  - Expand market presence among traditionally underserved neighborhoods, through working with community-based organizations.
- Providing support for financial literacy, budgeting and money management programs targeted to persons with limited experience with banks or banking.
- Providing access to resources in affordable housing, community and economic development and small business lending.

## **D. STRATEGIES AND TACTICS**

Mission Valley Bank intends to build upon its existing CRA related activities to further strengthen our community reinvestment performance and to enhance our record of helping to meet the credit needs in the communities we serve. To meet these goals, the Bank will appoint a Community Development Officer in addition to the CRA Committee (members should include Executive Management, the CRA Officer and others) focused on prudently expanding our community development product offerings and intensify our overall lending outreach to traditionally underserved communities in a prudent manner.

Through this Plan, Mission Valley Bank is affirming its long-standing commitment to help to meet the credit needs of its entire community – including low- and moderate-income persons and census tracts in its assessment area. To further enhance the Bank's existing CRA record, especially its Lending Test record, the Bank plans to pursue certain strategies that are intended to expand the Bank's lending in LMI census tracts and to LMI persons, improve its community development lending, expand its qualified investments, and enhance CD services.

These strategies may include:

- Strengthening engagements and entering into partnerships with community-based organizations serving LMI persons and neighborhoods in our communities to support achievement of the Bank's lending, investment, and service goals;
- Enhancing training of RMs relating to CRA products, programs, and techniques to identify and deliver CRA loans to our communities;
- Focusing on working in identified LMI markets and with LMI customers and smaller businesses;
- Expanding existing and/or exploring new wholesale and correspondent relationships to purchase loans from entities specializing in Affordable Housing, Community Development, and small business lending;
- Perform robust monitoring and analysis of CRA performance analytics;
- The Bank will review product offerings and, in consultation with its community development partners, will seek to design products and programs that will enable the Bank to reach lower and more moderate-income (LMI) clients.

## **III. CRA PROGRAM GOVERNANCE**

### **A. Board and CRA Committee Governance**

The Bank's Board Audit Committee actively provides oversight of the development and implementation of the CRA Plan and has approved it. The Bank's CRA Committee is tasked with oversight of the implementation of the Plan. CRA Committee membership includes the CRA Officer, Marketing, Sales Manager, Credit Administrator, and members of Executive Management.

Responsibility for assisting the Bank to meet its Community Reinvestment objectives and goals is that of all Bank employees. Roles and responsibilities related to critical activities required in order to successfully implement the Bank's CRA Plan are as follows.



## **B. Board of Directors Audit Committee**

The Board of Directors Audit Committee is responsible for:

- Establishing a climate and culture supportive of CRA throughout the Bank.
- Providing approval of the Bank's Community Reinvestment Act Plan and ensure it is updated regularly and as needed, in conjunction with the full Board.
- Requiring updates of the CRA Plan goals to reflect future activity, such as: branch closures, branch openings, mergers, acquisitions, or other relevant changes.
- Holding executive officers accountable for meeting CRA Plan goals.
- Receiving quarterly reports and program updates from the CRA Officer (quarterly at a minimum).
- Reviewing the Bank's CRA lending, investment, and service activities quarterly.
- Assisting the full Board in meeting its oversight responsibilities for CRA program direction and oversight.
- Ensuring that management is adequately engaged in its communities and has incorporated feedback in the CRA Program.
- Ensuring a Quarterly CRA self-assessment is conducted.
- Providing the CRA Officer with a direct line of communication to the Bank's board.

## **C. Executive Committee**

The Executive Committee is tasked with:

- Meeting periodically with the Bank CRA Officer to review CRA progress in meeting Plan goals.
- Receiving and reviewing the CRA self-assessment.
- Encouraging the development of loan products that enhance the Bank's ability to meet LMI credit needs consistent with the Bank's commitment to safe and sound lending.
- Developing expertise in leveraging private and government subsidies to enhance LMI and CD lending.
- Meeting periodically with representatives from local community development organizations.
- Performing marketing and community outreach to support achievement of CRA Plan goals.
- Serving as a liaison between the community and the Bank by initiating and maintaining regular communications with community development organizations, and other community-based entities.
- Work to promote CRA-qualified investments when opportunities are available, consistent with the Bank's investment and CRA requirements.
- Contacting and seeking partnerships with government and community development organizations to enhance product offerings to LMI residents and small businesses and for economic development.

## **D. CRA Officer/CRA Committee**

The Board has appointed Senior Management with the responsibility of the leadership required to fully implement this Strategic Plan. Oversight and administration are the responsibility of the Bank's CRA Committee. The Bank's CRA Officer chairs the CRA Committee and is responsible for actively monitoring the existing and future Strategic Plan and administering the CRA Program. The CRA Officer reports quarterly to the Board's Audit Committee regarding the Bank's progress toward meeting the goals included in the Strategic Plan. The CRA Officer, together with other members of senior management, continually seek input from community groups regarding the best way to maximize the Bank's commitment to community reinvestment.

The CRA Officer is responsible for reaching out to community groups and encouraging officers and employees of the Bank to volunteer to assist LMI persons and areas of the community. The CRA Officer is encouraged by the Bank's President & Chief Executive Officer to participate actively in active community groups that are aware of the community's needs. In addition, other officers are encouraged to assist LMI community groups through service on groups' boards of directors or otherwise.

The CRA Officer regularly reviews issuances from the FDIC and other banking agencies regarding CRA compliance and community development, in order to maintain best practices in the area of CRA. The CRA Officer attends targeted training events for CRA officers and community development professionals.

## **IV. MEASUREABLE GOALS FOR CRA LENDING, INVESTMENT AND SERVICE**

The Plan sets forth measurable lending goals for the Bank and for its Assessment Area ("AA") Pursuant to the Plan, the Bank will endeavor to increase or enhance:

- The number, amount, and variety of community development loans in its AAs;
- The proportion of small loans to businesses located in LMI census tracts and businesses with \$1 million or less in revenues;
- The amount of qualified investments and grants that support community and economic development; and
- The amount and range of community development services provided annually through our branches and by executives and senior officers.

## **V. PRODUCTS**

The Bank is primarily a commercial lender. At Mission Valley Bank we've developed a full suite of business solutions and services that are delivered by business bankers that believe in real relationship banking. Mission Valley Bank offers two types of SBA-affiliated loans, and various non-SBA commercial loans. The Bank is currently focused on SBA lending. As the Bank continues to grow, it is estimated that approximately 15% of the Bank's loan portfolio will consist of SBA-affiliated loans.

## **A. Credit Products**

In business today, decisions must be made quickly because opportunities don't usually wait. When it's time to purchase new equipment, upgrade technology, or increase inventory, our customers need prompt and decisive decisions from their banker and that's exactly what they get at Mission Valley Bank. At Mission Valley Bank we work to be that Trusted Advisor to walk the customer through the options that are available to help them stay competitive & grow their businesses. We offer a variety of customizable loans to suit the needs of our assessment area.

## **B. SBA Loans**

The Bank is a Preferred Lender (PLP status) for the U.S. Small Business Administration. This PLP status provides a lender with delegated credit approval authority on behalf of the SBA, which allows the Bank to better respond to and serve its borrowers. The following are descriptions of the SBA loan types offered by the Bank:

### SBA 7(a) Loan

The SBA 7(a) Guaranty Loan program has a maximum loan amount of \$5,000,000, of which a maximum of \$3.75 million will be guaranteed. The guaranty percentage varies, with 85% of the loan amount being guaranteed for loans up to and including \$150,000, and 75% being guaranteed on loans over \$150,000. The Bank utilizes the SBA 7(a) Program for small business borrowers for acquisition, construction, permanent financing, and in some cases, refinancing.

### SBA 504 Loans

This SBA 504 loan program is used only for acquisition, expansion, and construction of owner-occupied commercial real estate. This program is structured where the Bank provides a conventional 1<sup>st</sup> mortgage loan, and the SBA a 2<sup>nd</sup> mortgage loan, fully funded by the SBA and fully subordinate in both payment and liquidation to the 1<sup>st</sup> mortgage. The typical structure is 50% loan-to-value financing by the lender, 40% loan-to-value 2<sup>nd</sup> financing by the SBA, and the remaining 10% in the form of equity from the small business owner.

### Commercial Loans

The Bank offers conventional commercial loans to borrowers based on the soundness of the borrower's historical financial information and business model. Examples of conventional financing would include business lines of credit, business term loans, and commercial real estate financing, apartment financing, apartment seismic retrofit financing, automobile and truck financing, accounts receivable financing, credit cards and letters of credit.

### Consumer Loans

The Bank offers consumer loan products to its customers including automobile loans, overdraft protection lines, credit cards and personal loans.

## **C. Deposit Products**

The Bank offers a full suite of traditional deposit products including checking accounts, savings accounts, money-market accounts, and certificates of deposits, all of which provide FDIC insurance protection up to the fullest amount allowable by law.

### Business Solutions

In addition to traditional deposit products, the Bank offers a full suite of secure cash management products and services needed to meet the banking needs of its clients, including mobile and online banking, remote check deposits, ACH and wire transfers. Mission Valley Bank's Business Mobile gives the ability and flexibility to make decisions and approve transactions instantly from a smartphone. The suite includes a tool for fraud prevention that can help to detect and stop fraudulent transactions before they happen, protects against account takeover by safeguarding the approval process for ACH, wire transfers, and account transfers and guards against check fraud using positive pay and approvals. The Bank also offers reliable merchant card processing services

### Personal Solutions

In addition to traditional deposit products, the Bank offers a full suite of secure mobile banking services for our personal and small business online banking clients. The mobile banking services allow our clients to deposit checks from anywhere, quickly make bill payments, check account balances on the go, make transfers and more.

## **D. Lending and Deposit Product Focus**

The Bank focuses its deposit generation business by soliciting commercial deposits from business clients within the markets surrounding the branches. The Bank is primarily a commercial lender, with commercial loans comprising the majority of the Bank's loan activity. The Bank specializes in several specific market niches, including middle market, lending to professionals, merchant processing and Small Business Administration Loans. The institution's primary lending focus is lending to middle-market businesses with gross annual revenues (GARs) ranging from \$1 million to \$50 million.

The Bank focuses its lending business throughout the Southern California area through its branches and through its loan production office (LPO), also located in Southern California.

## **VI. Competition**

### **A. County Competition**

The Bank faces strong competition from numerous existing banks, credit unions and finance companies. According to the FDIC County report as of 12/31/18, there were 45 financial institutions in the Los Angeles County market, with a combined \$239.5 billion in deposits.

There are 35 banks with a main office in Los Angeles County with assets greater than \$300 million. Mission Valley Bank ranks 33rd in terms of asset size at \$349,829 million at 12/31/18. The 15 largest depository institutions with a total of 625 branches at 12/31/18 are as follows:

TABLE ONE		
BANK	ASSETS <sup>1</sup>	# OF BRANCHES
City National Bank	\$50,703,918	77
CIT Bank, National Association	\$42,181,682	66
East West Bank	\$41,017,421	113
Pacific Western Bank	\$25,702,360	79
Cathay Bank	\$16,765,633	68
Bank of Hope	\$15,307,614	66
Farmers and Merchants Bank of Long Beach	\$ 7,308,236	25
Hanmi Bank	\$ 5,490,028	42
Preferred Bank	\$ 4,217,941	13
CTBC Bank Corp. (USA)	\$ 3,454,180	13
Royal Business Bank	\$ 2,971,182	23
Manufacturers Bank	\$ 2,802,850	10
American Business Bank	\$ 2,157,443	5
Pacific City Bank	\$ 1,697,004	13
First Choice Bank	\$ 1,622,437	12
TOTAL BRANCHES:		625

## B. Local Competition

In our local market, the Bank faces competition from 14 banks with 24 branches in the combined area of Sun Valley, Woodland Hills, and Santa Clarita Valley. The major national banks have numerous competing branches in the Sun Valley, Woodland Hills, and Santa Clarita Valley areas. Many of our competitors have large advertising budgets, offer a large number of consumer and commercial banking products, and also strive to meet the needs of the local communities.

TABLE TWO Sun Valley Area Zip Code 91352	
Institution Name	# of Offices in Area
Bank of America, National Association	2
JPMorgan Chase Bank, National Association	2
Mission Valley Bank	1
City National Bank	1

<sup>1</sup> FDIC State bank report 12/31/18 fdic.gov

TABLE THREE Greater San Fernando Valley Area	
Institution Name	# of Offices in Area
Bank of America, National Association	3
Wells Fargo, National Association	2
MUFG Union Bank, National Association	1
Citibank, National Association	1
Pacific Western Bank	1
City National Bank	1
Community Bank	1
First Bank	1
ZB, National Association	1
Comerica Bank	1
Manufacturers Bank	1
Banc of California, National Association	1

TABLE FOUR Santa Clarita Valley - 91350	
Institution Name	# of Offices in Area
Bank of America, National Association	2
Citibank, National Association	1
JPMorgan Chase Bank, National Association	1
Mission Valley Bank	1

### C. SBA Loan Competition

#### Nationwide

Mission Valley Bank has made a concerted effort to be an active and growing lender to small businesses in its market in an effort to fulfill the needs of our community. Considering the Bank has only two branches and in spite of strong competition, the Bank has successfully granted a substantial number of small business loans to small businesses. This ranked Mission Valley Bank at **192nd** in the Nation for all SBA 7(a) lenders<sup>2</sup>.

---

<sup>2</sup> U.S. Small Business Administration, for the twelve months ended 12/31/18(SBA.gov)

### LA District

Within the SBA's Los Angeles District Office, for LA headquartered banks, Mission Valley Bank ranks 59<sup>th</sup> of 130 banks in the district<sup>3</sup>.

TABLE FIVE			
Ranking	Financial Institution	# of Approvals	Loan Amount
56	Beacon Business Bank, N.A.	6	\$4,003,000
57	American Riviera Bank	6	\$2,875,500
58	Manufacturers Bank	6	\$2,772,000
59	Mission Valley Bank	6	\$2,213,300

## **D. Mission Valley Bank Historical CRA Performance Evaluation**

The Bank's CRA Program is governed by the CRA Policy that is reviewed and approved annually by the CRA Committee and by the Board of Directors. The Board of Directors has designated a CRA Officer and established a CRA Committee. The CRA Committee will be tasked with overseeing the implementation of this Strategic Plan. The Committee meets as needed to monitor and discuss activities relating to the Bank's performance relating to its obligations under the CRA. The Bank's CRA Officer chairs the CRA Committee and is responsible for the administration of the program, and reports progress to the CRA Committee, as well and to the Board of Directors. Oversight and planning for CRA is also conducted by the Board of Directors Audit Committee.

### Regulatory Examination

The Bank was most recently examined by its regulator (FDIC) for CRA compliance in January of 2018 and received a **satisfactory**<sup>4</sup> rating. According to the FDIC, an institution in this category has a satisfactory record of helping to meet the credit needs of its assessment area, including low - and moderate-income neighborhoods, in a manner consistent with its resources and capabilities. The overall rating was based on lending performance, which was determined by analyzing small business lending and community development activities.

During this examination the FDIC commented:

- A majority of the small business loans since the last examination were originated within the Bank's assessment area, reflecting a reasonable commitment to meeting the credit needs of the assessment area.
- The Bank's small business lending was reasonably distributed throughout assessment area demographics.
- The Bank had not received any written CRA-related complaints.
- The CRA exam found no evidence of discriminatory or other illegal credit practices that would be inconsistent with helping to meet community credit needs.
- The Bank demonstrated adequate responsiveness to the community development needs

---

<sup>3</sup> U.S. Small Business Administration, for the twelve months ended September 30, 2019 (SBA.gov)

<sup>4</sup> FDIC Report of Examination January 2, 2018

of its AA through community development loans, qualified investments, and community development services.

### **E. Mission Valley Bank's Strategic Plan: Overall Goals, Effective Date and Term**

Mission Valley Bank is an FDIC-insured financial institution subject to the rules and regulations of that agency, including regulations under the Community Reinvestment Act ("CRA"). Congress passed the CRA in 1977. In 1995, current interagency regulations implementing the CRA became effective. For intermediate small banks, such as Mission Valley Bank, these regulations utilize a lending test that measures and evaluates a bank's lending activity within its designated assessment area. The lending test does not, however, adequately consider the situation of a banking operation such as Mission Valley Bank, who serves customers throughout a broad region and who may not have significant concentrations of its loan and deposit portfolios within its designated assessment area. As an alternative to this standard evaluation method, regulations permit an insured institution to comply with CRA by electing to implement an approved strategic plan. Accordingly, the Bank has elected to operate under this Strategic Plan in order to satisfactorily fulfill its CRA obligations.

The management of the Bank has set a goal of meeting or exceeding the metrics outlined below for satisfactory lending, investment, grants, and service levels, in each of the years covered by this Plan. It is the Bank's intention that through meeting these goals we will also help to meet the needs of the community within our assessment area. The Bank has identified the following areas within which to concentrate its CRA efforts:

- Small business lending;
- Financial Literacy in the classroom;
- Affordable housing;
- Community Development Services for Low Income Families;
- Preventing Elder Abuse in Senior Housing;
- Community Development Grants and Services for disabled children and young adults

## **VII. Plan Effective Date**

The proposed effective date of the Bank's Strategic Plan is January 1, 2021 and will cover the calendar years 2021- 2025. The term of the Plan will end on December 31, 2025. The Plan sets forth measurable goals in which the FDIC will be able to evaluate the Bank's performance as required by 12 C.F.R. §345.27(c)(1).

The Bank's Board of Directors and management team will oversee the Bank's progress in meeting the Plan's objectives. The Bank will request FDIC approval to modify or amend the Plan only if there is a material change in its underlying assumptions or in Mission Valley Bank's mission, objectives, or operations, and such changes would make the Plan no longer appropriate or viable. In such event, Mission Valley Bank would administer the modified or amended Plan in accordance with the FDIC regulatory requirements, timeframes, and guidelines for approval of a CRA strategic plan.

Any proposed changes to the Plan will follow the appropriate procedures for approval and notification. A new strategic plan may be developed for the Bank when this term has expired.



Mission Valley Bank Assessment Area

Mission Valley Bank had one designated assessment area (AA) that includes 2 political subdivisions called "Census County Divisions", consisting of Newhall, CA and San Fernando Valley, CA. The Bank's AA consists of 493 census tracts contained in the Newhall and San Fernando Valley "census county divisions" within Los Angeles County, California. Based upon the chart below, low- to moderate-income census tracts comprise approximately 28.2% of the Bank's AA. We believe that the AA is appropriately delineated, in compliance with CRA requirements, and consistent within the Bank's performance context.

TABLE SIX		
Census Tract Income Level	Census Tract Distribution #	Census Tract Distribution %
Low	15	3
Moderate	124	25.2
Middle	136	27.6
Upper	209	42.4
NA	8	1.8
TOTAL	493	100

Assessment Area Population

Based on 2010 census figures, information for same data, the total population of the Bank's AA is 2,095,370 and the number of households is 694,306<sup>5</sup>. The estimated median family income is \$62,703.

The number and percentage of households by income classifications are:

TABLE SEVEN	
Tract Income	% of Households
Low Income	22.9%
Moderate Income	14.3%
Middle Income	15.6%
Upper Income	47.2%
Total	100%

Assessment Area Businesses

According to 2017 D&B data, there were 169,629 businesses in the AA at the end of 2017. Gross annual revenues (GARs) for these businesses are below.

TABLE EIGHT	
Businesses by Gross Annual Revenue in Assessment Area	
Gross Annual Revenue	Percentage
\$1 million or less	88.8%
More than \$1 million	5.4%
Unknown	5.8%
Total	100%

Service industries represent the largest portion of businesses at 48.4 percent; followed by retail trade

<sup>5</sup> FDIC CRA Performance Evaluation 2018

(12.3 percent); non-classifiable establishments (9.8 percent); and finance, insurance, and real estate (8.6 percent). In addition, 73.0 percent of area businesses have four or fewer employees, and 93.1 percent operate from a single location.

TABLE NINE Businesses by Census Tract Income in Assessment Area	
Census Tract Income Level	Percentage
Low	1.6%
Moderate	19.1%
Middle	22.6%
Upper	56.5%
N/A	.2%
Total	100%

There are no legal constraints or non-standard limitations that affect the types of loans, investments, or services to be offered by the Bank. However; the internal business plan for the Bank, which was considered in the goals that are set forth under this Plan, does limit the types of businesses and property types that the Bank will lend to.

## VIII. Historical Performance – Small Business Loans

### A. Lending inside and outside of the Bank’s assessment area

The following table shows small business lending volume in and out of the Bank’s AA for 2016-2018.

TABLE TEN SMALL BUSINESS LOANS IN/OUT OF AA										
Period Ending	Number of Loans Originated					Dollar Originated (000's)				
	Inside AA		Outside AA		Total	Inside AA		Outside AA		Total
	#	%	#	%	#	\$	%	\$	%	\$
12/31/2016	80	65.6	42	34.4	122	\$24,588	56.7	18970	43.3	\$43,378
12/13/2017	86	69.4	38	30.6	124	\$25,166	64.1	14108	35.9	\$39,274
12/31/2018	126	72.86	47	27.2	173	\$27,760	62.5	16684	37.5	\$ 44,444

**B. Lending inside the AA as a percentage of average assets**

TABLE ELEVEN Historical Lending to Average Assets							
Period Ending	Dollar Originated (000's)					Y/E Average Assets	% of Average Assets
	Inside AA		Outside AA		Total		
	\$	%	\$	%	\$		
12/31/2016	\$24,588	56.7	18970	43.3	\$ 43,378	\$305,736	8.0%
12/13/2017	\$25,166	64.1	14108	35.9	\$ 39,274	\$322,411	7.8%
12/31/2018	\$27,760	62.5	16684	37.5	\$ 44,444	\$329,561	8.4%

**C. Geographic Distribution for Small Business Loans**

TABLE TWELVE Geographic Distribution of Small Business Loans					
Tract Income Level		#	%	\$(000s)	%
Low					
	2016	3	3.8	\$595	2.4
	2017	0	0	0	0
	2018	0	0	0	0
Moderate					
	2016	20	25.0	\$5,491	22.3
	2017	13	15.1	\$3,721	14.8
	2018	30	23.8	\$6,821	24.6
Middle					
	2016	27	33.8	\$9,870	40.01
	2017	31	36.0	\$8,720	34.6
	2018	39	31.0	\$7,690	27.7
Upper					
	2016	30	37.5	\$8,632	35.1
	2017	42	48.8	\$12,725	50.6
	2018	57	45.2	\$13,249	47.7
<b>Total</b>					
	2016	<b>80</b>	<b>100%</b>	<b>\$24,588</b>	<b>100%</b>
	2017	<b>86</b>	<b>100%</b>	<b>\$25,166</b>	<b>100%</b>
	2018	<b>126</b>	<b>100%</b>	<b>\$27,760</b>	<b>100%</b>

Source: GeoDataVision

## IX. Measurable Goals

The CRA strategic plan regulations provide flexibility regarding a bank's measurable goals, both in how the goals are expressed and regarding the three performance categories. For example, although the regulations provide that a bank should address in its Plan all three performance categories and "emphasize lending and lending-related activities," they also provide that:

*"Nevertheless, a different emphasis, including a focus on one or more performance categories, may be appropriate if responsive to the characteristics and credit needs of its assessment area(s), considering public comment and the bank's capacity and constraints, product offerings, and business strategy."*

The Bank has identified target goals in the following three areas:

- Small Business Lending;
- Community Development Lending/Investments
- Community Development Services

The goals have been stated as a percentage of our average assets. Rather than choose a progressive goal (as was observed in other agency approved plans), we have chosen to tie our goal to our asset size so it will grow as the Bank does. These goals include all new loans within our AA that are CRA qualified, including, but not limited to, small business loans and Community Development Loans originated or renewed within our AA in the given year. The Bank's measurable goals are set at a level that should be sustainable, depending on the relevant economic conditions at that time. Management feels the measurable goals compare favorably with other similarly situated institutions goals that were reviewed during the creation of this Plan, including those outlined in the Peer Bank section below.

Based on our projected asset size and financial situation, we have established measurable goals for the identified areas. The goals and the methodology behind them are set forth in the sections following.

## X. Performance Goals – Small Business Lending

The measurable goals contained within Table #13 consist of cumulative small business loans expressed as a percentage of the Bank's average assets<sup>6</sup> for each plan year. These goals have been set through an evaluation of the Bank's historical pattern for small business lending within the Bank's CRA AA. Historically, small business lending volume in the AA is on average around 8% of total small business loans. Therefore, the goals have been set at 8% of average assets per year so that the Bank may consistently provide lending services to its community to provide for lending growth in tandem with Bank growth. .

TABLE THIRTEEN Small Business Lending Goals for AA by Year					
	2021	2022	2023	2024	2025

---

<sup>6</sup> The Bank's average assets for any given plan year will be calculated using the amounts from line 9 of Schedule RC-K of the Bank's March 31<sup>st</sup>, June 30<sup>th</sup>, September 30<sup>th</sup>, and December 31<sup>st</sup> Call Reports for that plan year.

Lending as a % of Average Assets – Satisfactory	8%	8%	8%	8%	8%
Lending as a % of Average Assets – Outstanding	10%	10%	10%	10%	10%

### A. Sub-Lending Goals

To ensure that we are reaching out to all businesses within our assessment area, we are establishing the following sub-lending goals outlined within Tables #14 and #15 which will apply to our Small Business Lending Loans within our Assessment Area. We commit to making 25% of our small business loans to businesses located in low or moderate income census tracts. Over the past few years Mission Valley Bank has made a concerted effort to improve its performance in lending to small businesses with annual revenues equal to or below \$1 million within our Assessment Area. Past performance of approximately 25% was rated as “poor”. During the most recent examination performance improved to approximately 45%, demonstrating our efforts are generating results. It should also be noted, however, that a review of past examinations of peer or similarly situated financial institutions generally also demonstrated poor penetration. We believe this is reflective of both significant competition with larger institutions with more resources and specific geographic location. For example, some of the peers are located in the Greater Los Angeles basin where there are more opportunities for this type of lending. That said, we intend to commit to the higher level of 45% penetration of the total number of our small business loans within our assessment area to businesses with annual revenues equal to or below \$1 million to maintain our focus on better serving those members of our community. Recognizing that a loan to a business with revenue below \$1million may also be located in a low or moderate income census tract, in Query case it will count in both categories.

TABLE FOURTEEN Small Business Lending Goals for Low/Moderate Income Census Tracts by Year					
	2021	2022	2023	2024	2025
% by Number Volume of Small Business Loans in AA – Satisfactory	25%	25%	25%	25%	25%
% by Number Volume of Small Business Loans in AA – Outstanding	30%	30%	30%	30%	30%

TABLE FIFTEEN Small Business Lending Goals for Lending Borrower Profile Performance (<= \$1 million)					
	2021	2022	2023	2024	2025
% of Loans to Businesses with Gross Annual Revenue <= \$1 Million by Number Volume - Satisfactory	45%	45%	45%	45%	45%
% of Loans to Businesses with Gross Annual Revenue <= \$1 Million by Number Volume - Outstanding	55%	55%	55%	55%	55%

### B. Targeted Need

The Bank's CRA Strategic Plan goals were established to make an appropriate and meaningful contribution to meeting the needs of the families and communities within the AA. Because of the

Bank's deposit gathering and loan origination strategies, the Bank has chosen to focus its efforts on community development lending, investments, and services.

Our goals are weighted higher in the lending and investment areas. This is based upon the needs expressed by the community groups during our community development assessment.

Identified targeted needs are:

- **Promote Economic Development** — several enterprises have been identified that promote economic development by aiding small businesses within the AA.
- **Support Affordable Housing** - The Bank will participate in and support activities that provide revitalization to targeted zones within the Bank's assessment areas.
- **Contribute to Community Development Enterprises** — The Bank has identified community development organizations that need grants to support their office services and administrative functions.
- **Seek Small Business Lending** — The Bank will continue to seek out opportunities to lend to small businesses, within its AAs, that have gross annual revenues of less than \$1,000,000, and who would not be able to obtain financing through a traditional financing institution.

### C. Lending Actions

The Bank will continue/consider the following actions to support the success of the CRA lending goals for both small business loans and community development loans.

- Small Business Loans
  - ✓ Develop a suite of lending and deposit products targeted to small business;
  - ✓ Maintain the SBA Preferred Lender Designation;
  - ✓ Hold focus groups with community groups focused on small business lending and technical assistance to discuss additional small business lending needs;
  - ✓ Maintain a small business loan and technical assistance referral program to local CDFIs and other nonprofit partners;
  - ✓ Develop training and educational materials to educate community partners on the Bank's small business product suite;
  - ✓ Design a marketing program to build awareness of all small business products offered by the Bank;
  - ✓ Ensure that marketing campaigns include low and moderate and underserved communities.
- Community Development Loans
  - ✓ Consider hiring a community development loan officer;
  - ✓ Create a training program for the Bank's commercial loan officers and credit risk management to augment the knowledge and skills of its lenders; and Underwriters to allow the Bank to underwrite community development loans more effectively;
  - ✓ Expand partnerships with CDFIs or qualified nonprofit organizations.

## D. Lending Channels

Mission Valley Bank intends to utilize the following channels for meeting its CRA lending goals. It is important to note that the Bank is not limiting itself to the specific channels described below, nor is it committing to utilize all of the specific channels described below. Thorough research has led us to believe that the following avenues meet the criteria established under the CRA Community Development definitions and restrictions, and are quality organizations dedicated to worthwhile missions.

### Small Business Lending

The Bank also understands that some of its usual lending activities can be counted for CRA credit. Loans approved for customers within our assessment area which have a commitment amount under \$1,000,000 may qualify as a "small business loan" and those with a commitment amount greater than \$1,000,000 may qualify as a "community development loan" for CRA evaluation purposes.

### Non-Profit Lending

The Bank will explore the possibility of low interest loans to other non-profit organizations serving the housing needs of low-to-moderate income individuals in its assessment area.

## XI. Performance Goals - Community development loans and investments

Community development lending and qualified investments, including grants to nonprofit organizations. The Bank's measurable goals are set at a level that should be sustainable, depending on the relevant economic conditions at that time. It should be noted that historical activity covers a somewhat short period of time due to the timing of when Mission Valley Bank qualified to become an Intermediate Small Bank where Community Development requirements were first imposed. Reviewing peer data on Community Development Lending and Investment data from the most recent examination periods, it was difficult to make a meaningful comparison to arrive at appropriate goals. Mission Valley Bank's performance was widely inconsistent having been impacted by the purchase of a sizeable multifamily loan portfolio in one year and Paycheck Protection Loans in the early part of 2020. Management has established Community Development Lending and Investment goals as a percentage of Average Assets at 5%. It should be noted that these goals are more favorable than the other similarly situated institution's goals that were reviewed during the creation of this Plan and are listed later in the Plan. In order to assist in achieving these more aggressive goals Mission Valley Bank intends to focus on originating SBA 504 loans which typically qualify as Community Development Loans and to originate or participate in multifamily lending programs when appropriate.

Using a cumulative qualified funds as a percentage of total average assets metric ensures actual funds committed to Community Development Lending and Investment goals will increase as the Bank grows. It is the Bank's intent to meet the cumulative goals stated below in each individual year of the Plan's term. The calculation for each year will include new community development loans and investments made within the plan year, plus prior-period investments still on the Bank's books at year-end. Mission Valley Bank goals for community development loans and investments are outlined in Table #16 below.

<b>TABLE SIXTEEN</b>					
<b>Community Development Lending and Investments as a % of Average Assets</b>					
	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>
CD Lending/Investments as a % of Average Assets – Satisfactory	5.0%	5.0%	5.0%	5.0%	5.0%
CD Lending/Investments as a % of Average Assets – Outstanding	10.0%	10.0%	10.0%	10.0%	10.0%

### Peer Bank Goals<sup>7</sup>

Mission Valley Bank examined other strategic plans to gauge the reasonableness of these goals. We were unable to locate another bank within our market area with a strategic plan, so we looked for banks with a similar business model. The banks with the most similar business models to Mission Valley Bank are Silvergate Bank, headquartered in La Jolla, California, Seacoast Commerce Bank, headquartered in Chula Vista, California, and Live Oak Banking Company, headquartered in North Carolina. We chose to match the commitments of the institution that we are most closely aligned as far as business plan. Seacoast operates in Southern California like Mission Valley Bank and specializes in small business lending, primarily through the SBA program and lends in and out of its AA, as well.

<b>TABLE SEVENTEEN</b>			
<b>Silvergate Bank</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
CD Loans/Investments as a % of Average Assets – Satisfactory	1.50%	1.50%	1.50%
CD Loans/Investments as a % of Average Assets – Outstanding	2.50%	2.50%	2.50%

<b>TABLE EIGHTEEN</b>			
<b>Seacoast Commerce Bank</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
CD Loan/Investments as a % of Average Assets – Satisfactory	1.25%	1.25%	1.25%
CD Loans/Investments as a % of Average Assets – Outstanding	1.50%	1.50%	1.50%

<b>TABLE NINETEEN</b>			
<b>Live Oak Banking Company</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
CD Loan/Investments as a % of Average Assets – Satisfactory	1.20%	1.20%	1.20%
CD Loans/Investments as a % of Average Assets – Outstanding	1.45%	1.45%	1.45%

## XII. Goals and Standards - Qualified Community Development Grants

Through its retail and lending network, the Bank seeks to provide various community development services to LMI persons and geographies and small businesses. Further, in developing the Plan and subsequent goals for meeting the Bank's community development activity targets, specific attention is applied to the Bank's AA and objectives established accordingly.

Grants and charitable contributions made by the Bank that meet the primary purpose of

<sup>7</sup> Data taken from the respective institution's publicly available Strategic Plan



community development will be considered qualified for CRA credit if they meet the needs of the Bank's AA, including grants and charitable contributions specifically focused on the Bank's primary AA as well as grants and charitable contributions that benefit a broader region that includes the Bank's primary AA.

The Bank intends to meet its investment goals through a combination of grants and donations as it sees appropriate in a given year according to the current financial position of the Bank. Based on research completed to develop this Strategic Plan, the following goals have been deemed appropriate for the Bank. The investment and service goals are set in table #20 below.

<b>TABLE TWENTY</b>					
<b>Community Development Investment and Service Goals</b>					
<b>Mission Valley Bank</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>
New Grants – Satisfactory	\$22,000	\$30,000	\$38,000	\$46,000	\$54,000
New Grants – Outstanding	\$27,000	\$35,000	\$43,000	\$51,000	\$59,000

**Peer Bank Goals**

In order to measure the reasonableness of these goals, the Bank again examined the goals of Silvergate Bank, Seacoast Commerce Bank, and Live Oak Banking Company. The goals established for these institutions are detailed below.

<b>TABLE TWENTY-ONE</b>			
<b>Silvergate Bank</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
New Grants - Satisfactory	\$52,150	\$58,300	\$66,500
New Grants – Outstanding	\$64,145	\$71,709	\$81,795

<b>TABLE TWENTY-TWO</b>			
<b>Seacoast Commerce Bank</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
New Grants – Satisfactory	\$38,000	\$46,000	\$54,000
New Grants – Outstanding	43,000	51,000	\$59,000

<b>TABLE TWENTY-THREE</b>			
<b>Live Oak Banking Company</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
New Grants – Satisfactory*	\$165,000	\$215,000	\$265,000
New Grants – Outstanding*	\$180,000	\$240,000	\$290,000

\*Live Oak is a large bank, allowing for larger contributions.

The Bank intends to meet its community investment goals by utilizing the channels discussed below. It is important to note that the Bank will not limit itself to the specific channels described below, nor will be committed to utilize all of these avenues.

The Bank will explore opportunities to give grants to local organizations that support our CRA goals of 1) affordable housing, 2) community services for low-income families, and 3) Preventing Elder Abuse in Senior Housing, 4) Financial Literacy in the classroom, and 5) services for disabled children and young adults. Organizations must target or predominantly serve low- or moderate-income

individuals. These could include but are not limited to organizations such as shelters/soup kitchens; programs for financial education, literacy, or other educational ends; holiday or beginning-of-school drives for children and support for economic revitalization of depressed and underserved areas within the Bank's AA. Mission Valley Bank management has met with several local groups to discuss specific opportunities for grants, including but not limited to:

**Senior Housing Crime Prevention Foundation (SHCPF) - <http://www.shcpfoundation.org/>**

SHCPF is a national organization which was established to provide a vehicle for banks to earn CRA consideration. It has been used by financial institutions in an effort to address Lending, Investments, and/or Service credit. This program allows banks to serve an underserved segment of society, low- and moderate-income senior housing residents.

The sole objective of the SHCPF is to reduce crime in the nation's senior housing facilities and to provide on-going, effective crime prevention programs that promote safe, secure, and high quality of life environments for senior housing residents. In part, this objective is accomplished by installing the highly successful Senior Crime Stoppers program in facilities sponsored through CRA investments or loans to the SHCPF. Nationally, the Senior Crime Stoppers program has reduced all incidents of crime in participating senior housing facilities by approximately 95 percent as of July 1, 2018.

The SHCPF is structured to provide the Bank with qualified CRA consideration to address Lending, Investments, and/or Servicing test credit.

Working through SHCPF, Mission Valley would focus on Senior Housing Residences who serve low to moderate individuals. Only funds for Community Development would count toward our goals. Funds for general operations will not be included.

**Banzai On-line Financial Literacy Curriculum <https://www.teachbanzai.com/>**

Banzai delivers its award-winning online curriculum directly to the classrooms of over 50,000 teachers nationwide to teach their students to be better stewards of their money. Banzai partners with local sponsors to provide this high-quality program for teachers and students, at no cost. Local Banks and Credit Unions generously pay for the materials for teachers to use in their classroom. They offer time, money, industry experience, classroom presentations, and a variety of additional resources to help educate a financially responsible generation. Working through Banzai, Mission Valley can provide a needed financial education to students in the Bank's AA. At the time of the completion of this CRA Strategic Plan, Mission Valley Bank was sponsoring seven schools in the Bank's AA.

**Hope of the Valley Rescue Mission <http://www.hopeofthevalley.org/>**

Hope of the Valley Rescue Mission started in 2009 and operates out of a 26,000 sq. Ft facility in Sun Valley, CA. The organization provides housing and homeless services to the poor. The mission of the organization is to provide hope, hot meals, housing, health care and healing to the hungry, hurting, and homeless in the San Fernando Valley. The organization is governed by a skilled and experienced local board of directors comprised of men and women who have a tremendous passion to meet the needs of the hurting in the greater Los Angeles area. The Mission operates a

10-month Residential Men's Drug and Alcohol Recovery Program, the Genesis House, a 30-bed family shelter with special emphasis on homeless moms and kids, a 50 bed facility for men in Burbank, an 85 bed Cold Weather Shelter in Pacoima, The Help Center an Access Center/Day Shelter in Van Nuys, a 55 bed Cold Weather Shelter in Skid Row in Los Angeles, and a Recuperative Care Shelter, Commercial Catering Kitchen, Mental Health and Community Health Clinic in Mission Hills. Annually the Mission provides over 207,000 hot nutritious meals, 61,000 nights of shelter and places hundreds of homeless men, women, and children into permanent and permanent supportive housing.

**The Valley Economic Alliance (TVEA)** <https://www.thevalley.net>

The Valley Economic Alliance began on 1/17/1994 and is a non-profit strategic private-public collaborative made up of businesses, government, education and community organizations whose mission is engage and unite Valley stakeholders to raise standards of living and economic vitality across the five-city region – Burbank, Calabasas, Glendale, Los Angeles and San Fernando consisting of more than 70,000 businesses and over 2.1 million residents covering more than 350 square miles. The alliance provides clients with referrals to Community Development Financial Institutions (CDFI) and financial institutions. The majority of their referrals come from low -to-moderate income areas and are ethnically diverse, including women owned businesses.

TVEA has a four-pronged mission for the Valley:

- Economic Development & Retention: Expand, retain, and attract businesses and jobs in the five-city San Fernando Valley region
- Education and Workforce Development: Convene Valley workforce and education leaders to help prepare, place and re-train employees that exceed the needs of Valley businesses.
- Livable & Sustainable Communities: Provide leadership for the creation of economically viable and sustainable communities, resulting in an improved quality of life for all residents.
- Marketing the Valley: Promote the Valley Economic Alliance as the region's economic development organization; to market the five-city San Fernando Valley as a prime location for businesses to grow and thrive, and an ideal place to live, work, learn, play, and visit.

**Business Assistance/Layoff Aversion Program**

TVEA joined forces with the LA Workforce Investment Board and the LA Economic Development Corporation to provide businesses confidential and complimentary consultations, connect and refer them to helpful resources and services through our business assistance and layoff aversion programs. This work is performed via contracts with the County and City of LA, saving thousands of jobs per year. This service has become more invaluable as technological changes have impacted businesses ability to grow and prosper in the 21<sup>st</sup> century economy, as well as find skilled labor to perform the new tasks and jobs. TVEA helps with: business plan development, financing by way of introductions to its banking partners, marketing plan development, site selection, permits, cost containment (lower utility and energy bills), layoff and downsizing, workforce training and development, ADA compliance, tax credits and incentives including employer hiring tax credits, and hiring needs, skills gaps and training opportunities as well as attracting new customers through special events, expos, career and job fairs and seminars. This program has been successful with 9000 outreach calls

impacting 5500 jobs and 600 in person consultations to financially stressed businesses.

### **Business Accelerator Program**

In partnership with C-Level Roundtable, TVEA provides a shared space for entrepreneurs and business owners to propel their growth by creating an incubator like environment where they can collaborate, build meaningful relationships and prospects for accelerated growth. Participants leave with a business plan and an action plan, along with the confidence to execute their plan. There are synergies between TVEAs program in that a graduate of the Accelerator Program may advance to the Women's Collaborative Mentoring Program for ongoing coaching/mentoring and skill development. A recent graduate of the program went from being homeless to ultimately running a social media/marketing business generating over \$10,000 in monthly revenue with a national sports brand as a client.

### **Women's Collaborative Mentoring Program (WCMP)**

The WCMP serves economically disadvantaged women-owned small businesses, providing no cost directive business training. The WCMP performs a qualified assessment of the business to customize a business mentoring program for the participant and assemble the expertise needed for each specific business. The WMCP brings together over 20 mentoring and training organizations and their resources for one-on-one group mentoring sessions to help business owners continue to grow and accelerate their business. WCMP was originated to provide business owners with coaching/mentoring and ongoing training to learn how to use the information they receive and put it into practice for business success. Therefore, WCMP is more focused on outcomes rather than the number of people/businesses touched.

Mission Valley Bank has 2 leaders involved with each TVEA board. Additionally, Tamara Gurney, Mission Valley Bank's President and CEO sits on the Management and Executive Financial Committees. The Bank assists with mentoring and coaching for TVEA identified financially stressed businesses, the Woman's Collaborative Mentoring Program, and the Business Accelerator Program. As an example, for the past year Mission Valley Bank has assisted a woman owned financially stressed business that was turned down by 5 other financial institutions, and was able to provide the business a \$125,000 loan. The Bank is also assisting in the early stages of developing a financial planning with key milestones for a beauty school seeking a \$500,000 loan. If the Bank is unable to provide financing to one of TVEAs referrals, it will assist the business by seeking other lenders such as the Small Business Development Corporations (SBDC) to assist if possible. In addition, many times the Bank is able to help the business owner take steps to become bankable over a period of time.

### **Valley Economic Development Corporation (VEDC) [www.vedc.org](http://www.vedc.org)**

The mission for the VEDC is to create and sustain jobs and businesses in the Los Angeles community by providing high-quality small business development services. This mission is carried out through providing loans and technical assistance to small businesses in low-income areas. Small businesses provide the vast majority of jobs and income for residents of low-income communities. As a Community Development Financial Institution (CDFI), VEDC supports neighborhoods by encouraging entrepreneurship to thrive. Since 1976 VEDC has created more than \$10,000 new jobs and helped 25,000 workers across 3500 businesses continue working. Women-owned businesses

account for 51% of the client base and minority-owned businesses account for 77% of the client base. Seventy-five percent of the client base is low- or moderate-income. Below are recent accomplishments of the VEDC:

- Technical assistance programs have served over 9,600 clients with one-on-one consulting, workshops, entrepreneurial training, and other services.
- The Women's Business Center was awarded the 2018 Women's Business Center Award of Excellence from the SBA.
- The Travelers Small Business Risk Education program has expanded into 10 U.S. cities, including Los Angeles.
- Two Business Accelerators were opened in the economically underserved communities of Watts and the Los Angeles Harbor region.
- An automated lending platform was established that allows lending staff to manage loans and serve loan applicants more efficiently.

The VEDC is interested in expanding its access to capital and technical assistance services to more Santa Clarita Valley small business owners, with an emphasis on growing enterprises that create jobs for low- and moderate-income (LMI) residents of Santa Clarita and surrounding regions such as Newhall and sections of Canyon Country. Mission Valley Bank can assist in this effort through an investment to provide both vitally needed loan capital as well as counseling and workshop services designed to help business owners achieve self-sufficiency, create jobs, and bring economic stability to LMI communities in the region. The President and CEO sits on the Board of Directors of the VEDC.

### **Carousel Ranch** [www.carouselranch.org](http://www.carouselranch.org)

Carousel Ranch is a 10+ acre ranch in dedicated to improving the lives of children and young adults with special needs. Through both our equestrian therapy and vocational training programs, we strive to create an atmosphere where every student can and will succeed...a place where therapy is disguised as fun. Two programs are run at the ranch, Equestrian Therapy and Ready to Work.

#### Equestrian Therapy

At Carousel Ranch, equestrian therapy takes students into a new, unexplored world, and provides a sense of independence and freedom that defies their disability. Exercises performed on the back of the horse challenge our riders in ways that they have seldom been challenged before. Any child with any disability is eligible for the program. From the most severely disabled to those with learning disabilities, an individualized program will be developed to suit each child's needs and goals. Fees are based on ability to pay and they strive to offer scholarship assistance for those in need. The goals and benefits are different for every child, depending on their individual needs. The movement of the horse causes an inherent response from the child, relaxing muscles that are tight, increasing tone in muscles that are weak, building balance, coordination, and control, increase motor skills, improvements in behavior and sensory processing.

### Ready to Work!

At age 22, young adults with disabilities "age out" of the educational system. This can be a disorienting and dis-empowering event that alters their routine, isolates them from friends and mentors, and leaves them without a daily purpose and place to be. Though finding and securing employment can often be very difficult, and Carousel Ranch hopes for that for our students. The Ready to Work! concept will help to change that scenario, showing that each has the capacity to be contributing members of society. Ready to Work! has two components:

- A classroom-based curriculum teaching "soft skills" needed to be successful in the workplace. From simply clocking in and wearing a uniform, how to work as a team, having appropriate behavior, being flexible, having a positive attitude, etc. Students complete a resume, learn, and practice interview skills and come out far "readier to work".
- Classroom curriculum is then brought to life through actual work in the "Tack Shack/Snack Shack" social enterprise, run by the students, as well as various jobs around the ranch. By the time that our students leave here, they have done a variety of work – from horse and ranch care to vehicle washing, construction to office work, retail, food service, cashiering and so much more.

The program began with a pilot in June 2016 and to date, 28 students have participated. Mission Valley Bank is proud to partner with Carousel Ranch to provide these vital community services.

## **XIII. Performance Goals - Community Development Services**

CRA service is a corporate priority. Managers and employees will be encouraged to provide service in their local communities. Bank employees are encouraged to be involved in their local communities through participation with community development non-profit organizations and other economic development entities that serve broader statewide or regional areas that include the Bank's assessment areas. Managers will ensure their staff is aware of the Bank's commitment to community involvement and the Bank's CRA Officer will monitor service hours and their documentation. Services provided must be reported to the CRA Officer through appropriate documentation.

The Bank instituted a tracking mechanism that measures the number of community development activities by employees, the nature of those activities (e.g. board memberships versus one-time project) and the number of hours devoted to each. Community development activities will be tracked on a quarterly basis and reported to the CRA Committee and Board's Audit Committee.

Mission Valley Bank has structured its service goal based upon two (2) hours of service per full-time employee (FTE) per year within our current AA. The Bank will support the volunteer services of its employees and members of the Board of Directors to various community-based groups that are involved in economic development or other community revitalization efforts. Community Development Services will be focused inside the Bank's AA. We understand that to qualify for the goals outlined below the service must:

- Be completed as a representative of the Bank
- Have Community Development as its primary purpose
- Be related to the provision of Financial Services

Organizations that Mission Valley Bank is considering as primary conduits for community service for economic development and other community revitalization efforts include, but are not limited to, the entities below (see Section XII above for further detail regarding these entities):

- Senior Housing Crime Prevention Foundation <http://www.shcpcfoundation.org/>
- Banzai On-line Financial Literacy Curriculum <https://www.teachbanzai.com/>
- Hope of the Valley Rescue Mission <http://www.hopeofthevalley.org/>
- The Valley Economic Alliance (TVEA) <https://www.thevalley.net>
- Valley Economic Development Corporation (VEDC) [www.vedc.org](http://www.vedc.org)
- Carousel Ranch [www.carouselranch.org](http://www.carouselranch.org)

### Mission Valley Bank Goals

The goals for service and volunteerism for directors, officers, and employees of the Bank are as follows:

TABLE TWENTY-FOUR COMMUNITY DEVELOPMENT SERVICE GOALS					
Mission Valley Bank	2021	2022	2023	2024	2025
Hours of Service per FTE – Satisfactory	4.0 per FTE	4.0 per FTE	4.0 per FTE	4.0 per FTE	4.0 per FTE
Hours of Service per FTE – Outstanding	5.0 per FTE	5.0 per FTE	5.0 per FTE	5.0 per FTE	5.0 per FTE

### Peer Bank Goals

In order to measure the reasonableness of these goals, the Bank again examined the goals of Silvergate Bank, Seacoast Commerce Bank, and Live Oak Banking Company. The goals established for these institutions are detailed below.

TABLE TWENTY-FIVE			
Silvergate Bank	2017	2018	2019
Hours of Service – Satisfactory	205	256	288
Hours of Service – Outstanding	333	416	468

TABLE TWENTY-SIX			
Seacoast Commerce Bank	2016	2017	2018
Hours of Service – Satisfactory	2.0 per FTE	2.0 per FTE	2.0 per FTE
Hours of Service – Outstanding	3.0 per FTE	3.0 per FTE	3.0 per FTE

TABLE TWENTY-SEVEN			
Live Oak Banking Company	2018	2019	2020
Hours of Service – Satisfactory	170	180	190
Hours of Service – Outstanding	220	230	240

## **XIV. COMMUNITY COMMITMENT & SOCIAL IMPACT**

At Mission Valley Bank we believe that to truly serve a community, you must be an active and contributing member. This belief has made our community commitment an integral part of our philosophy. Our community roots run deep. Our team is motivated by a strong desire to be an integral part of the communities we serve. Our bankers benefit personally and professionally from civic involvement by developing lasting relationships and a better understanding of the needs of the areas where we live, work, and play.

Our contributions locally are many. Members of our management team serve on a number of boards and foundations, sharing their time and expertise. Mission Valley Bank is proud of our team members who dedicate many hours to worthwhile programs throughout the year, helping local business groups, nonprofits, youth, family, and civic organizations. Additionally, since Mission Valley Bank was founded in 2001, we have made financial education a primary focus, hosting no-cost seminars for our clients and local area businesses.

In support of this community commitment, we are proud to be recognized as a long-time participant in the Community Development Financial Institutions Fund (CDFI). The fund was established to facilitate increasing economic opportunities and community development investments for underserved populations and distressed communities throughout the United States. Our participation in the CDFI Fund has enabled Mission Valley Bank to reach far beyond the local communities we serve.

**GIVE WHERE YOU LIVE** - In 2015, Mission Valley Bank founded our Give Where You Live program and is proud to feature nonprofit organizations within our community. We encourage others to join us to "give where you live" to help support those worthwhile causes. Mission Valley Bank's local roots run deep, motivated by the desire to be an integral part of the community we serve. A strong community thrives on personal relationships and Mission Valley Bank supports – and is honored to be supported by the communities we serve.

## **XV. Public Participation in Development of the Plan**

Mission Valley Bank has solicited input from the community through discussions with community development organizations, financial intermediaries and government agencies, while developing this Strategic Plan. The Bank solicited input from entities within its AA including:

### **Hope of the Valley Mission**

[www.hopeofthevalley.org](http://www.hopeofthevalley.org)

Contact: Ken Craft 818.392.0020

ken.craft@hopeofthevalley.org

Date of contact 11/1/18

### **The Valley Economic Alliance (TVEA)**

<https://www.thevalley.net/>

Contact: Kenn Phillips 818.379.7000

kphillips@economicalliance.org



Date of contact 12/6/18

**Valley Economic Development Corporation (VEDC)**

[www.vedc.org](http://www.vedc.org)

Contact: Robert Dennen, CFO and Alex Guerrero, VP of Development 818.907.9977

Rdennen@vedc.org; aguerrero@vedc.org

Date of contact 12/6/18

**Carousel Ranch**

[www.carouselranch.org](http://www.carouselranch.org)

Denise Redmond, Executive Director 661.268.8010

Date of contact 11/1/18

## **XVI. Notice Regarding Public Inspection of the Plan**

Mission Valley Bank solicited comments from the community prior to submitting the Plan for FDIC approval by posting a notice in the Daily News (Los Angeles County) starting 3/2/20 through 3/31/20 and on the Bank's web-site; [www.MissionValleyBank.com](http://www.MissionValleyBank.com). Each alerted the community to the creation of the Plan and solicited feedback for a 30-day period. The public comment period inadvertently took place during the midst of the Coronavirus pandemic and the Bank did not receive any comments from the community.

During our previous public comment period, which took place starting May 13, 2019 through June 11, 2019, the Bank received the following comments:

**From Mamie Tod, Customer**

"I reviewed the Strategic Plan and am very supportive of Mission Valley Bank. I have business and personal accounts with them. I appreciate how they place importance on putting the community first and are actively involved in many of the areas charitable and economic development efforts. They create a culture of care for the businesses and communities they serve. Their Strategic Plan has my full support."

**From Denise Redmond, Executive Director, Carousel Ranch**

"Carousel Ranch is ever so grateful for the support and partnership of Mission Valley Bank. Without their assistance in financing our property, we would not have had the great opportunity to have a permanent home that allows for continued growth and sustainability. Over the years they have not only provided financial support through their generous donations, but their staff has assisted Carousel Ranch with financial advice and best practices, strategy planning oversight and human resource policy and employee initiatives. Without partnerships like those of Mission Valley Bank, Carousel Ranch would not be able to continue to grow in serving more disabled children through equestrian therapy and to provide a great occupational program for older youths looking to become job ready in our Ready to Work services. We truly appreciate their commitment and cannot thank them enough for their support."

**From Alejandro Guerrero, President, VEDC**

"Economic Development is a deliberate intervention in a community. Mission Valley Bank's CRA Strategic Plan will impact communities most in need and the thoughtful approach evident in the

partnerships with community-based non-profits, access to capital and technical assistance providers, and the strategic commitment to retaining and creating quality jobs is needed in the LMI communities the bank's CRA efforts will address. We are pleased to be working with Mission Valley Bank to positively impact our LMI communities."

**From Ken Craft, CEO, Hope of the Valley Rescue Mission**

"As the leader of a local non-profit that provides services and programs for the hungry and homeless, I have personally read and evaluated Mission Valley Bank's CRA Strategic Plan. I appreciate the effort that went into their Plan as they strive to meet the needs of the community. Mission Valley Bank understands the local community and is committed to strategically investing into organizations that are leading the way in social change. Thank you, Mission Valley Bank!"

## **XVII. Satisfactory and Outstanding Goals**

Mission Valley Bank believes the measurable goals for lending, investment, and service, as specified above, adequately consider the realities of the Bank's current business model and operating environment and meeting these goals constitutes a "Satisfactory" or "Outstanding" performance, as appropriate, under CRA requirements.

## **XVIII. Ongoing Review of Performance Goals and Standards**

Mission Valley Bank recognizes that the lending, investment, and service goals outlined in this Strategic Plan are based on general assumptions about the Bank's business model and industry as well as general economic conditions. These assumptions and conditions may change. As a result, the Board of Directors, or a committee thereof, will monitor the Bank's performance vis-à-vis these goals on a quarterly basis. Any changes to the Plan that are deemed necessary as a result of these quarterly reviews will be made in accordance with the FDIC's requirements, guidelines and approval process. Such changes are only expected to be made if there are significant changes to the underlying assumptions which render the goals contained in this Strategic Plan no longer viable or appropriate.

## **XIX. Election of Alternative Performance Evaluations**

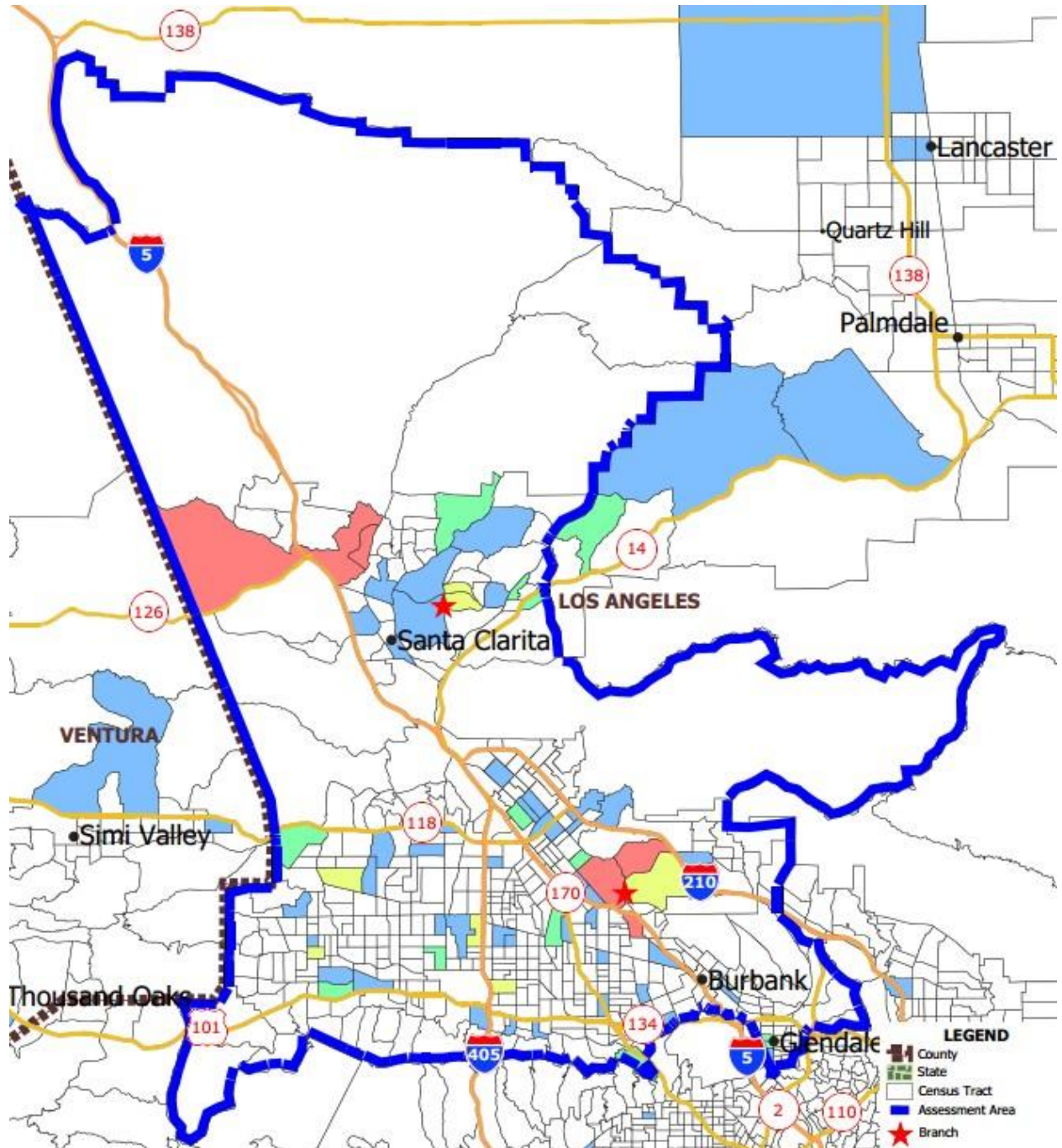
The Bank requests to be evaluated solely on small business lending, qualified community development lending, qualified community development investment, qualified grant, and qualified service methods and goals outlined in this Plan.

## **XX. Request for Approval**

Management believes that this Strategic Plan is appropriate to meet the requirements of the CRA and FDIC regulations promulgated thereunder, and the Bank respectfully requests the FDIC's approval of this Strategic Plan.

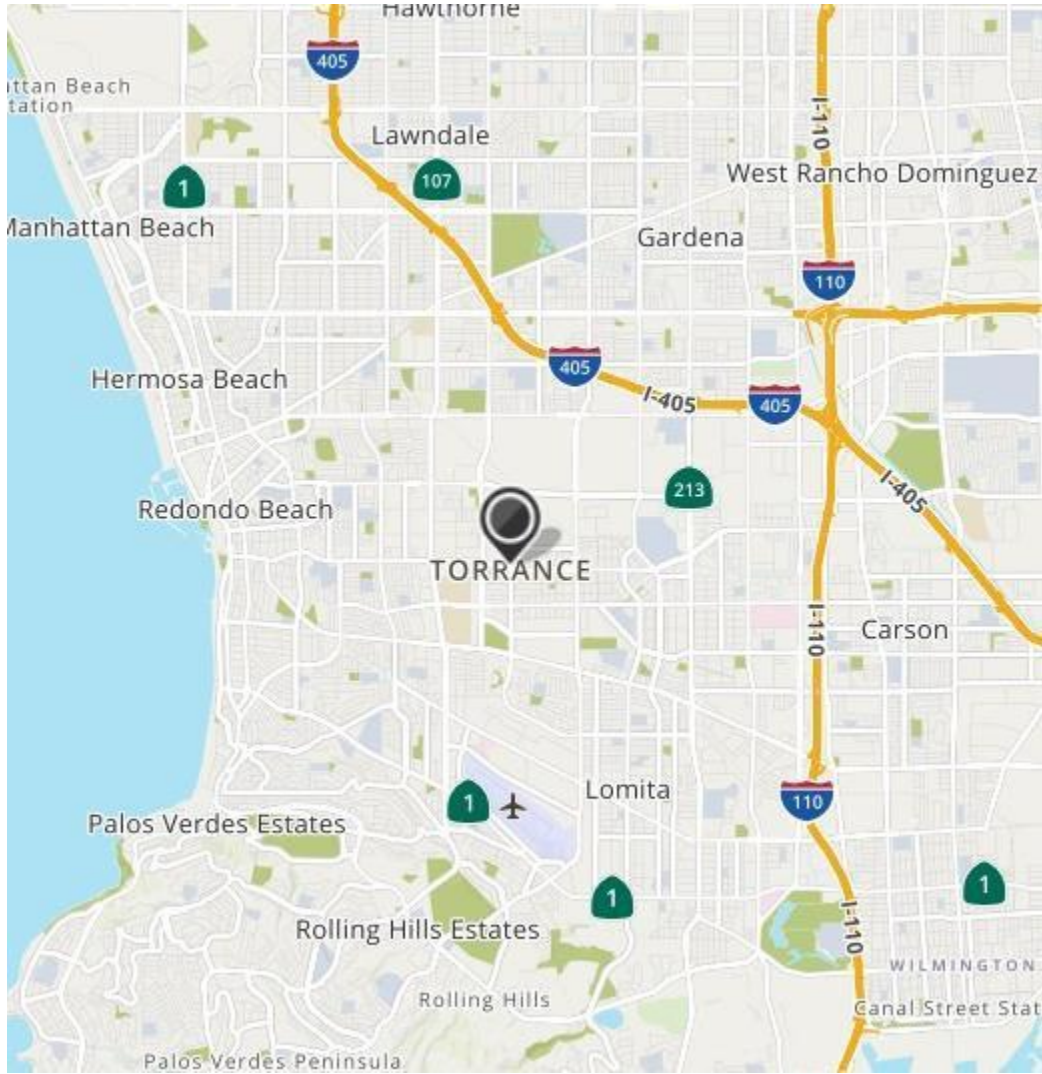
### ASSESSMENT AREA MAP

CALIFORNIA – 2 Census County Divisions, consisting of Newhall, CA, and San Fernando Valley



## SOUTH BAY LOAN PRODUCTION OFFICE

### TORRANCE, CALIFORNIA



**PROOF OF PUBLICATION – THE DAILY NEWS, LA COUNTY**

**PROOF OF PUBLICATION AFFIDAVIT  
(2015.5 C.C.P.)**

**STATE OF CALIFORNIA  
County of Los Angeles**

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of the

**DAILY NEWS**

a newspaper of general circulation published 7 times weekly in the City of Los Angeles, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of May 26, 1983, Case Number Adjudication #C349217; that the notice, of which the annexed is a printed copy has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit: 3/2, 3/3, 3/4, 3/5, 3/6, 3/7, 3/8, 3/9, 3/10, 3/11, 3/12, 3/13, 3/14, 3/15, 3/16, 3/17, 3/18, 3/19, 3/20, 3/21, 3/22, 3/23, 3/24, 3/25, 3/26, 3/27, 3/28, 3/29, 3/30, + 3/31/20

all in the year 20..20.....

I certify (or declare) under penalty of perjury that the forgoing is true and correct.

Dated at Woodland Hills, California

On this 31 day of MARCH, 20 20

Mark Gerstner  
Signature

Proof of Publication of

*NOTICE OF INTENT*

(DAILY NEWS)  
**MISSION VALLEY BANK – NOTICE OF INTENT TO FILE COMMUNITY REINVESTMENT ACT STRATEGIC PLAN**  
Mission Valley Bank intends to file a Community Reinvestment Act Strategic Plan with FDIC Regional Director, San Francisco, California, during April 2020. We welcome written comments from the public on this plan and will consider all comments received on or before March 31, 2020, in the development of the final plan. The Plan may be viewed at [www.MissionValleyBank.com](http://www.MissionValleyBank.com). Written comments on the plan can be emailed to Tamara Gurney, President/CEO at [TGurney@MissionValleyBank.com](mailto:TGurney@MissionValleyBank.com) or mailed to the attention of Tamara Gurney at 9116 Sunland Boulevard, Sun Valley, CA 91352. All written comments received on or before March 31, 2020, will be submitted with the plan to the FDIC Regional Director and become a permanent addition to the plan. Publish March 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 2020

ARTICLE TEXT:

Mission Valley Bank intends to file a Community Reinvestment Act Strategic Plan with FDIC Regional Director, San Francisco, California, during April 2020. We welcome written comments from the public on this Plan and will consider all comments received in the development of the final Plan. The Plan may be viewed at [www.MissionValleyBank.com](http://www.MissionValleyBank.com). Written comments on the Plan can be emailed to Tamara Gurney, President/CEO at [TGurney@MissionValleyBank.com](mailto:TGurney@MissionValleyBank.com) or mailed to the attention of Tamara Gurney at 9116 Sunland Boulevard, Sun Valley, CA 91352. All written comments received before March 31, 2020 will be submitted with the Plan to the FDIC Regional Director and become a permanent addition to the Plan.

## PROOF OF PUBLICATION – MISSIONVALLEYBANK.COM

This notice was placed for the duration of the Newspaper Ads (3/2/20 through 3/31/20) – Opening slider on the Home Page with a click thru to the Plan and Comment Submission Form.

The screenshot displays the Mission Valley Bank website's home page. At the top, there is a navigation bar with the bank's logo, "YOUR SUCCESS IS OUR MISSION", and menu items for "BUSINESS SOLUTIONS", "PERSONAL SOLUTIONS", "WHO WE ARE", and "WANT TO KNOW MORE?". A search bar and a "SUBMIT" button are also present. Below the navigation is a large banner with an aerial view of a city. The banner text reads "A BANK THAT STRENGTHENS THE COMMUNITY" in large white letters, with a red button below it that says "VIEW OUR CRA STRATEGIC PLAN".

Below the banner, there is a section titled "COMMUNITY REINVESTMENT ACT 2020-2024 STRATEGIC PLANNING". This section includes a "NOTICE PUBLISHED March 2, 2020 REGARDING PUBLIC INSPECTION OF THE PROPOSED CRA STRATEGIC PLAN FOR MISSION VALLEY BANK". The text states that Mission Valley Bank intends to file a Community Reinvestment Act Strategic Plan with the FDIC Regional Director in San Francisco, California, during April 2020. It also mentions that the bank welcomes written comments from the public on the plan and will consider all comments received on or before March 31, 2020. A "DOWNLOAD COMMUNITY REINVESTMENT ACT" button is located at the bottom of this section.

To the right of the text is a thumbnail image of the "COMMUNITY REINVESTMENT ACT 2020-2024 STRATEGIC PLAN" document. Below the text and thumbnail is a "LEAVE A COMMENT" section with a form. The form includes fields for "Your Name", "First Name", "Last Name", "Phone Number", "Email Address", and "Comments, Requests or Questions". A security disclaimer at the bottom of the form states: "Security reminder: This is a non-secure link intended for general banking questions and requests for additional information. Please do not include any of your personal banking information (i.e., credit security numbers, account numbers, PIN or passwords, etc.), as information sent to us from this page is not encrypted."