



CRA Public File



CRA Public File

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Public Comments

12 CFR 25.43(a)(1); 12 CFR 228.43(a)(1); 12 CFR 345.43(a)(1); 12 CFR 195.43(a)(1)

All written comments received from the public for the current year and each of the prior two calendar years related to the institution's performance in helping to meet community credit needs and any response to the institution's comments are included below.

2021-2024: None

Branch & Office Locations

12 CFR 25.43(a)(3); 12 CFR 228.43(a)(3); 12 CFR 345.43(a)(3); 12 CFR 195.43(a)(3)

A list of the institution's branches, street addresses, and geographies.

Headquarters Branch

41391 Kalmia Street, Suite 100
Murrieta, CA 02562

MSA Code: 40140

State Code: 06

County Code: 065

Tract Code: 0506.00

Tract Income: Upper

Branch Openings and Closures

12 CFR 25.43(a)(4); 12 CFR 228.43(a)(4); 12 CFR 345.43(a)(4); 12 CFR 195.43(a)(4)

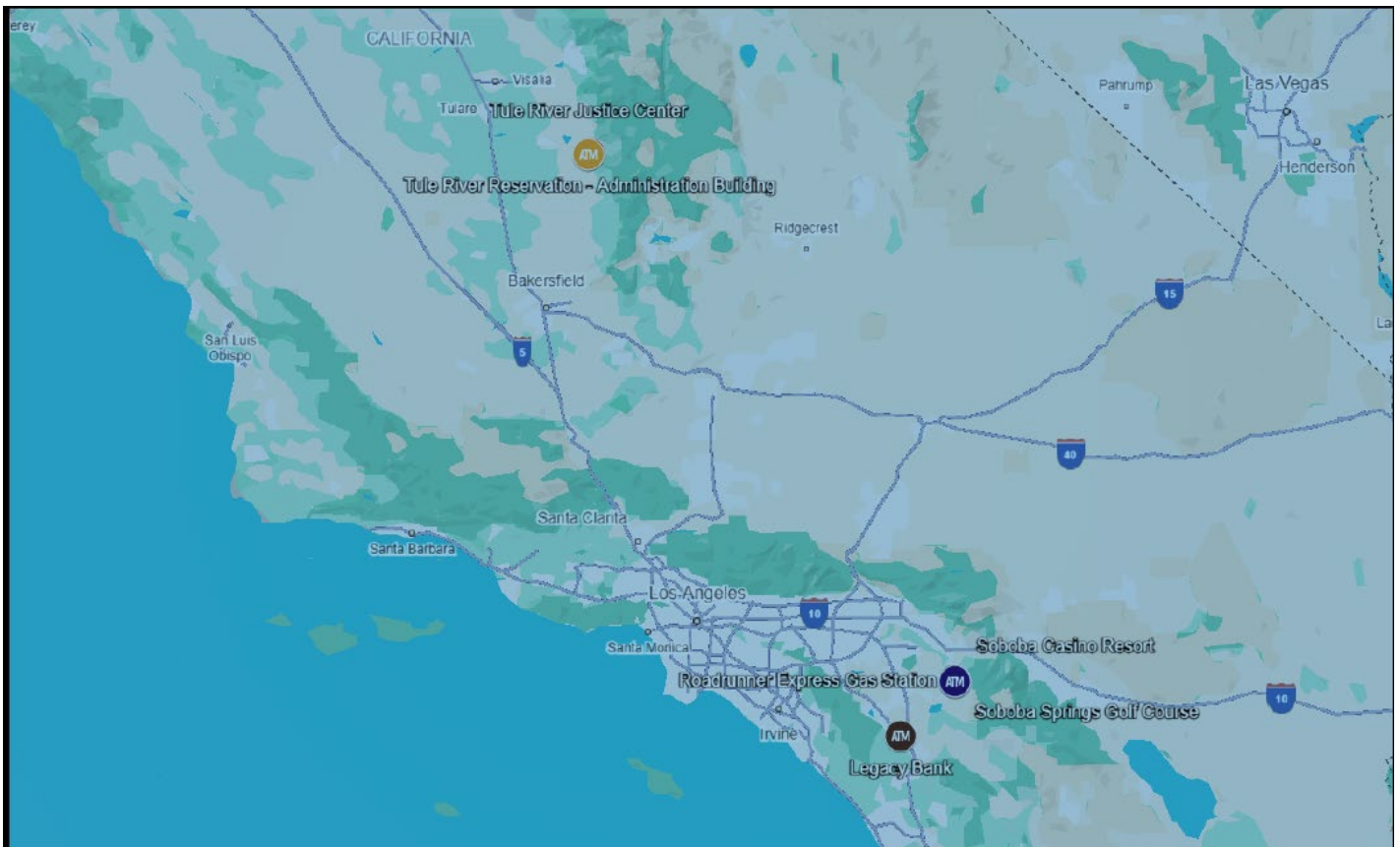
A list of branches opened or closed by the bank during the current year and each of the prior two calendar years, their street addresses, and geographies.

OPENED	CLOSED
June 10, 2022 Headquarters Branch 41391 Kalmia Street, Suite 100 Murrieta, CA 02562	N/A
February 15, 2023 Soboba Roadrunner (Full service ATM) 2214 Lake Park Drive San Jacinto, CA 92581	N/A



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December 10, 2024 Tule River Reservation (Full service ATM) 340 N Reservation Rd. Porterville, CA 93257	N/A
December 10, 2024 Tule River Reservation (Full service ATM) 129 S Reservation Rd. Porterville, CA 93257	N/A
January 22, 2025 Soboba Casino (Full service ATM) 22777 Soboba Rd., San Jacinto, CA 92583	N/A
January 22, 2025 Soboba Golf Course (Full service ATM) 1020 Soboba Rd., San Jacinto, CA 92583	N/A





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Offerings

12 CFR 25.43(a)(5); 12 CFR 228.43(a)(5); 12 CFR 345.43(a)(5); 12 CFR 195.43(a)(5)

A list of services (including hours of operation, available loan and deposit products, and transaction fees) generally offered at the branches and descriptions of material differences in the availability or cost of services at particular branches, if any.

Headquarters Branch Hours: Monday-Friday, 9 AM to 5 PM

CONSUMER BANKING	
DEPOSITORY PRODUCTS	LOANS AND CREDIT PRODUCTS
Checking Accounts	Consumer Installment Loans
Interest Checking Accounts	Auto Loans
Savings Accounts	
Money Market Accounts	
Certificate of Deposits	
Gold Checking (50+)	
Foundation Checking	
Individual Retirement Accounts	

COMMERCIAL BANKING	
DEPOSITORY PRODUCTS	LOANS AND CREDIT PRODUCTS
Checking Accounts	Commercial Term Loans
Interest Checking Accounts	Commercial Revolving Lines
Savings Accounts	Comm'l. Real Estate – Non-Owner Occupied
Money Market Accounts	SBA Commercial Loans
Certificate of Deposits	SBA Real Estate- Owner Occupied
	State Gtd. Commercial Loans
	State Gtd. Real Estate- Owner Occupied
	Construction Loans
	Farmland Loans
	Letter of Credit
	Credit Cards

CONVENIENCE BANKING SERVICES	
ACH Origination	Mobile Banking
ATM Services	Night Depository
Bill Payment	Online Banking
Cashier's Checks	Positive Pay
Debit Cards	Remote Deposit Capture
Electronic Statements	Wire Transfers



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CRA Performance Evaluation

12 CFR 25.43(a)(2); 12 CFR 228.43(a)(2); 12 CFR 345.43(a)(2); 12 CFR 195.43(a)(2)

A copy of the public section of the bank's most recent CRA performance evaluation must be placed in the public file within 30 business days after its receipt.

Status: Posted

(See APPENDIX A)

CRA Strategic Plan

12 CFR 25.43(b)(4); 12 CFR 228.43(b)(4); 12 CFR 345.43(b)(4); 12 CFR 195.43(b)(4)

This requirement is for banks that have been approved to be assessed under a strategic plan; the public file must also contain a copy of the Plan. The Bank does not need to include information submitted on a confidential basis in conjunction with the Plan.

Not Applicable

HMDA Disclosure Statement

12 CFR 25.43(b)(2); 12 CFR 228.43(b)(2); 12 CFR 345.43(b)(2); 12 CFR 195.43(b)(2)

Not applicable; the bank is not a HMDA reporter.

2021 - 2022	None
2023	None
2024	None
2025	None



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Area Assessment Maps and Income Demographics

12 CFR 25.43(a)(6); 12 CFR 228.43(a)(6); 12 CFR 345.43(a)(6); 12 CFR 195.43(a)(6)

A map of each assessment area showing the area's boundaries to identify the geographies within the assessment area, either on the map or in a separate list

See Appendix A for

- Bank financial ratios
- Geocode summary census demographic information
- GeoDataVision census information
- Bank assessment area
- Public Disclosure
 - CRA Performance Evaluation 2024
 - Community Support Agency – Federal Housing Finance Agency 2023



Appendix A

Loan-to-Deposit Ratios

12 CFR 25.43(b)(3); 12 CFR 228.43(b)(3); 12 CFR 345.43(b)(3); 12 CFR 195.43(b)(3)

For Small Banks, the loan-to-deposit ratio for each quarter of the prior calendar year and, at its option, additional data on its loan-to-deposit ratio.

2022 1 st Quarter	Not applicable, Bank opened June 10, 2022
2022 2 nd Quarter	0%
2022 3 rd Quarter	78.83%
2022 4 th Quarter	176.4%
2023 1 st Quarter	52.1%
2023 2 nd Quarter	51.3%
2023 3 rd Quarter	64.2%
2023 4 th Quarter	76.6%
2024 1 st Quarter	88.8%
2024 2 nd Quarter	79.5%
2024 3 rd Quarter	92.3%
2024 4 th Quarter	110.0%
2025 1 st Quarter	108.4%
2025 2 nd Quarter	97.9%
2025 3 rd Quarter	78.2%

Data Source: Net Loans and Leases to Deposits from [FDIC's BankFind Suite](#), accessed November 2025

Geocode Summary Census Demographic Information





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2023 FFIEC Geocode Census Report

Matched Address: 41391 Kalmia St, Murrieta, California, 92502
MSA: 40140 - RIVERSIDE-SAN BERNARDINO-ONTARIO, CA
State: 06 - CALIFORNIA
County: 065 - RIVERSIDE COUNTY
Tract Code: 0506.00

Summary Census Demographic Information

Tract Income Level	Upper
Underserved or Distressed Tract	No
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$94,500
2023 Estimated Tract Median Family Income	\$138,745
2020 Tract Median Family Income	\$112,596
Tract Median Family Income %	146.82
Tract Population	7869
Tract Minority %	46.80
Tract Minority Population	3683
Owner-Occupied Units	1661
1- to 4- Family Units	1886

Census Income Information

Tract Income Level	Upper
2020 MSA/MD/statewide non-MSA/MD Median Family Income	\$76,686
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$94,500
% below Poverty Line	7.73
Tract Median Family Income %	146.82
2020 Tract Median Family Income	\$112,596
2023 Estimated Tract Median Family Income	\$138,745
2020 Tract Median Household Income	\$94,659

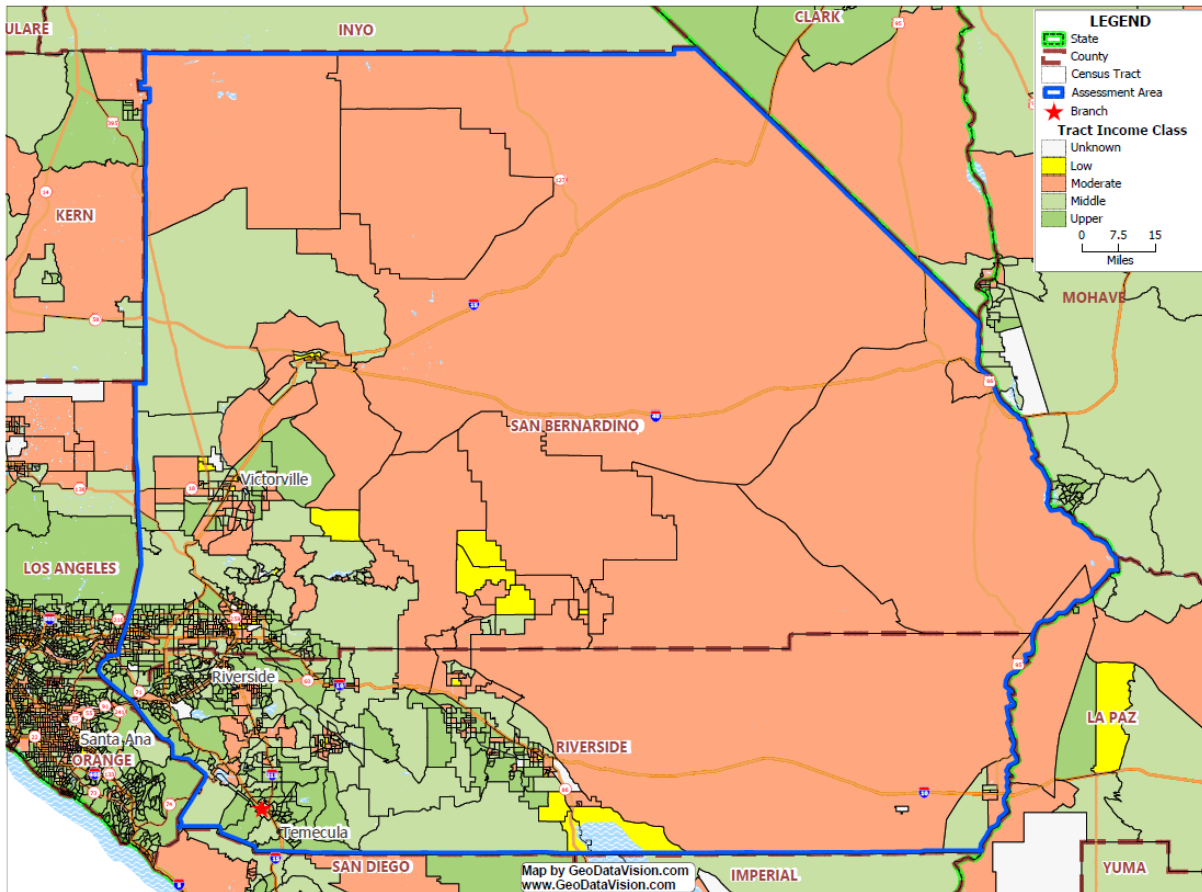
Census Population Information

Tract Population	7869
Tract Minority %	46.80
Number of Families	1699
Number of Households	2230
Non-Hispanic White Population	4186
Tract Minority Population	3683
American Indian Population	30
Asian/Hawaiian/Pacific Islander Population	535
Black Population	378
Hispanic Population	2227
Other/Two or More Races Population	513

Census Housing Information

Total Housing Units	2330
1- to 4- Family Units	1886
Median House Age (Years)	20
Owner-Occupied Units	1661
Renter Occupied Units	569
Owner Occupied 1- to 4- Family Units	1636
Inside Principal City?	NO
Vacant Units	100

LEGACY BANK- ASSESSMENT AREA 2024



Riverside-San Bernardino-Ontario, CA MSA (40140)

PUBLIC DISCLOSURE

April 15, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Legacy Bank
Certificate Number: 59204

41391 Kalmia St
Murrieta, California 92562

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
San Francisco Regional Office

25 Jessie Street at Ecker Square, Suite 2300
San Francisco, California 94105

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The following points summarize the bank's Lending Test performance.

- The loan-to-deposit (LTD) ratio is reasonable given the institution's asset size, financial condition, and assessment area credit needs.
- The institution originated and purchased a majority of its small business loans within the assessment area.
- The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects reasonable penetration of loans among businesses of different revenue sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

DESCRIPTION OF INSTITUTION

Legacy Bank (LB) is a single branch, state chartered, minority-owned depository institution located in Murrieta, California. LB is a new bank that opened for business as of June 10, 2022. This is the institution's first CRA Performance Evaluation. The institution's single location is in a middle-income census tract. LB is wholly owned by Legacy Bancorp, single-bank holding company owned by the Soboba Band of Luiseno Indian Tribe (Soboba). Additional LB affiliates include the Soboba Band of Luiseno Indians, the Soboba Economic Development Corporation, and Soboba Foundation. Examiner's evaluated the bank's CRA performance under the Interagency Small Institution Examination Procedures.

LB's primary business focus is providing commercial lending and depository services to small and medium-sized businesses. Commercial loan products include secured loans, equipment financing, lines of credit, letters of credit, owner-occupied and investor real estate loans, Small Business Administration (SBA) loans, and credit cards. LB also has a Tribal Lending Division that offers tailored financial solutions for tribes and tribal members that includes Bureau of Indian Affairs and HUD 184 Lender Programs. The bank also offers a variety of deposit products for both business and consumer customers, including money market, checking, savings, and certificate of deposit accounts. Alternative retail banking services include online banking with bill payment, mobile banking, and P2P transfers. LB also operates two full-service ATMs, one of which is located on the Soboba Reservation. LB's hours of operation and availability of products and services are designed to meet the convenience and needs of the institution's customer base.

According to the December 31, 2023 Report of Condition and Income (Call Report), LB had total assets of \$62.2 million, total loans of \$34.9 million, total deposits of \$45.6 million, and total equity capital of \$14.9 million. The following table shows LB's loan portfolio composition as of December 31, 2023.

Loan Portfolio Distribution as of 12/31/2023		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	602	1.7
Secured by Farmland	94	0.3
Secured by 1-4 Family Residential Properties	0	0
Secured by Multifamily (5 or more) Residential Properties	2,277	6.5
Secured by Nonfarm Nonresidential Properties	20,852	59.8
Total Real Estate Loans	23,825	68.3
Commercial and Industrial Loans	9,567	27.4
Agricultural Production and Other Loans to Farmers	1,362	3.9
Consumer Loans	150	0.4
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	0	0.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	34,904	100.0
<i>Source: Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the institution's ability to meet assessment area credit needs.

DESCRIPTION OF ASSESSMENT AREA

The bank's assessment area consists of the entirety of Riverside and San Bernardino Counties that together make up the Riverside-San Bernardino-Ontario Metropolitan Statistical Area (MSA) #40140.

Economic and Demographic Data

According to the 2020 U.S. Census, the assessment area consists of 48 low-, 282 moderate-, 362 middle-, 279 upper-income census tracts, and 13 census tracts with no income designation. The following table contains relevant assessment area demographic information.

Demographic Information of the Assessment Area						
Assessment Area: Riverside-San Bernardino MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	984	4.9	28.7	36.8	28.4	1.3
Population by Geography	4,599,839	4.0	27.3	37.4	30.4	1.0
Housing Units by Geography	1,566,442	4.2	27.3	37.8	29.9	0.7
Owner-Occupied Units by Geography	882,033	2.2	21.4	38.3	37.4	0.6
Occupied Rental Units by Geography	494,470	7.5	37.1	37.1	17.7	0.7
Vacant Units by Geography	189,939	4.7	29.4	37.4	26.9	1.6
Businesses by Geography	422,087	2.8	23.2	37.2	36.0	0.7
Farms by Geography	8,252	3.1	21.1	39.9	35.3	0.6
Family Distribution by Income Level	1,029,309	21.8	17.5	19.3	41.4	0.0
Household Distribution by Income Level	1,376,503	24.3	15.8	17.9	42.0	0.0
Median Family Income MSA - 40140 Riverside-San Bernardino-Ontario, CA MSA		\$76,686	Median Housing Value			\$355,170
			Median Gross Rent			\$1,427
			Families Below Poverty Level			10.5%
Source: 2020 U.S. Census and 2023 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.						

Riverside and San Bernardino Counties

According to the March 2024 Moody's Analytics Report and 2020 U.S. Census Data, economic activity in Riverside and San Bernardino Counties is doing well. Job growth is demonstrating modest net gains. Overall unemployment increased from 4.1 percent in 2022 to 4.6 percent in 2023. This was due to moderate labor force gains. While the area has experienced employment reduction

in the transportation and warehousing sectors, there has been steady job growth in the healthcare, government, and construction sectors. Increased military defense spending has also positively assisted the region.

The area has seen above-average population growth. Further, the area has experienced positive net migration with most people coming from Los Angeles and Orange Counties. Elevated inflation and housing prices continue to be a concern for the area, especially due to the lack of higher paying jobs to advance economic growth. Area strengths include comparative advantage in transportation, distribution, and warehousing, lower business and housing costs than other nearby areas, a young population, and positive net migrations. Area weaknesses include lack of a vibrant central downtown core, lack of high-wage industries, and low educational achievement. Area employment is concentrated in education and health services, government, and transportation/utilities. The area's top employers are Stater Brothers Markets, Arrowhead Regional Medical Center, and U.S. Marine Corps. Air Ground Combat Center.

Competition

LB operates in a highly competitive market with a significant number of institutions in the market area, many of whom are much larger than LB. According to the June 20, 2023 FDIC Deposit Market Share Report, there are 38 other financial institutions operating 467 offices in LB's assessment area with total deposits of \$76.6 billion. LB's deposit market share is 0.04 percent and ranks 33rd in the assessment area. The institution is only one of four operating in the area that has all locations within the Riverside-San Bernardino-Ontario MSA. The top five institutions control approximately 77.8 percent of the deposit market share with a combined \$59.7 billion in total deposits.

Community Contacts

Examiners conducted a community contact interview with a representative from a new local nonprofit affordable housing organization serving the bank's assessment area. The organization supports the assessment area by providing safe and affordable housing alternatives through advocacy and education. The profile of those serviced include immigrants, seniors, foster youth, veterans, and other persons. The organization also supports the Bank On initiative, attempting to close the gap between the banked and unbanked communities by partnering with financial institutions to offer products and services to serve the unbanked and underbanked communities served. The contact stated that while nearly 200,000 Bank On products are open in the assessment area approximately 20 percent of the population remains unbanked or underbanked. Some of the unbanked communities' impediments in establishing a banking relationship includes relatability with banks, lack of sufficient credit history to obtain lending products, or derogatory remarks prohibiting access to deposit accounts.

Credit Needs

Considering area demographics, economic data, and discussions with institution management and a community contact, examiners determined that affordable housing and small business credit are the primary area credit needs. Although affordable housing represents a community need, opportunities

are limited based on a low inventory of available housing as well as deteriorating affordability. Business demographics support the need for small business loans with 66.4 percent of business employing between 1 and 4 people and 89.3 percent of businesses with revenues of less than \$500,000.

SCOPE OF EVALUATION

General Information

Examiners used the Interagency Small Institution Examination Procedures to evaluate LB's CRA performance. This evaluation covers the period from when the bank opened for business on June 10, 2022 to the current evaluation date of April 15, 2024.

Activities Reviewed

Examiners determined that the institution's major product line is small business loans. This conclusion is supported by LB's business strategy as well as by the number and dollar volume of loans originated during the review period. LB is not a HMDA reporter originating only one multifamily residential mortgage loan for \$2.3 million during the review period. In addition, LB originated one small farm loan totaling \$100,000 during the review period. Examiner's relied upon an electronic data download to determine loan products as well as the number and dollar volume of loans reviewed.

Examiners reviewed the universe of all small business loans originated or purchased in 2022 and 2023. During 2022 and 2023, LB originated and/or purchased 19 small business loans totaling \$12.2 million. The following table shows the number and dollar volume of small business loans by year.

Loan Products Reviewed				
Loan Category	Universe		Reviewed	
	#	\$(000s)	#	\$(000s)
Small Business				
2022	5	2,260	5	2,260
2023	14	10,043	14	10,043
Total	19	12,303	19	12,303
<i>Source: Bank Data</i>				

Examiners compared the universe of small business loans to 2022 and 2023 D&B data for borrower profile and geographic distribution of loans in the institution's assessment area. The D&B data is based on geographic location using the 2020 U.S. Census data boundaries for the total businesses in the assessment area and the reported gross annual revenues (GAR) of those businesses.

Examiners reviewed both the number and dollar volume of small business loans. While the number and dollar volume are presented, examiners emphasized the number of loans, as it is a stronger indicator of the number of businesses served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

LB demonstrated reasonable performance under the Lending Test. The Lending Test performance is supported by the LTD ratio, assessment area concentration, geographic distribution, and borrower profile.

Loan-to-Deposit Ratio

LB's LTD ratio is reasonable given the institution's asset size, financial condition, and assessment area credit needs. The bank's LTD ratio averaged 70.6 percent calculated from Call Report data over the past seven calendar quarters from June 30, 2022 to December 31, 2023. The ratio ranged from a low of 0.0 percent as of June 30, 2022 to a high of 174.1 percent as of December 31, 2022. The elevated fluctuation is attributed to the bank's opening of its first branch in June of 2022 and the need to borrow funds to support initial lending.

Examiners identified two similarly-situated institutions operating within the assessment area with a substantially similar lending focus. The following table shows LB's average net LTD ratio compared to the two similarly situated institutions.

Loan-to-Deposit (LTD) Ratio Comparison		
Bank	Total Assets as of 12/31/2023 (\$000s)	Average Net LTD Ratio (%)
Legacy Bank	62,155	70.59
Similarly-Situated Institution #1	446,831	50.65
Similarly-Situated Institution #2	36,054	77.85
Source: Reports of Condition and Income 06/30/2022 – 12/31/2023		

LB maintained a net LTD ratio within the ratios of the identified similarly-situated institutions. The bank's deposit and loan growth have steadily increased over the previous four quarters resulting in an average net LTD ratio of 60.3 percent during that time.

Assessment Area Concentration

LB made a majority of its small business loans within its assessment area by both number and dollar volume. The following table shows the lending performance during the evaluation period.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business										
2022	4	80.0	1	20.0	5	1,439,800	63.7	820,000	36.3	2,259,800
2023	8	57.1	6	42.9	14	5,775,000	57.5	4,268,200	42.5	10,043,200
Subtotal	12	63.2	7	36.8	19	7,214,800	58.6	5,088,200	41.4	12,303,000
Total	12	63.2	7	36.8	19	7,214,800	58.6	5,088,200	41.4	12,303,000
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.										

The decrease in 2023 lending inside the assessment area is reflective of the bank's status as a new institution competing with already established institutions serving the assessment area.

Geographic Distribution

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. The following table illustrates the bank's geographic distribution for 2022 and 2023 small business loans within the assessment area compared to D&B data.

Geographic Distribution of Small Business Loans					
Assessment Area: Riverside-San Bernardino MSA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2022	2.8	1	25.0	19,800	1.4
2023	2.8	0	0.0	0	0.0
Moderate					
2022	23.3	0	0.0	0	0.0
2023	23.2	3	37.5	1,920,000	33.2
Middle					
2022	37.1	2	50.0	720,000	50.0
2023	37.2	3	37.5	2,155,000	37.3
Upper					
2022	36.1	1	25.0	700,000	48.6
2023	36.0	2	25.0	1,700,000	29.4
Not Available					
2022	0.7	0	0.0	0	0.0
2023	0.7	0	0.0	0	0.0
Totals					
2022	100.0	4	100.0	1,439,800	100.0
2023	100.0	8	100.0	5,775,000	100.0
Source: 2022 & 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%					

LB's lending in low-income census tracts is approximately 22.0 percentage points higher than the percentage of businesses; however, this percentage is made up of only one loan. Further, the bank did not originate any loans in moderate-income census tracts in 2022. LB was only in business for approximately six months in 2022, of which the first three months were largely focused on establishing operations and bringing in deposits. In 2023, the bank did not originate any loans in low-income census tracts; however, lending exceeded the percentage of businesses in moderate-income census tracts by 14.3 percentage points. Further, the number of loans originated in moderate-income tracts supported the higher percentage. Overall, LB's geographic distribution of small business loans is reasonable considering its limited time in business.

Borrower Profile

The distribution of borrowers reflects, given the assessment area demographics, reasonable penetration among businesses of different revenue sizes. The following table illustrates the bank's 2022 and 2023 small business loans by GAR.

FHFA Federal Home Loan Bank (FHLBank) Member ID Number: 56730

Name of FHLBank Member Institution: Legacy Bank

Mailing Address: 41391 Kalmia Street, Suite 100

City: Murrieta

Submitter Name: Michael Vantrease

Work Email: mvantrease@legacybankca.com

State: CA

Title: President

Zip Code: 92562

The information in the Community Support Statement (CSS) submitted by the member, as reflected in this document, may be updated, or changed upon FHFA’s review of the CSS.

Part I. Community Reinvestment Act (CRA) Standard:

Most recent CRA rating: Not Subject to CRA

Year of most recent CRA rating:

Please provide an explanation as to why your institution is not subject to CRA. (maximum 500)

During a compliance visitation in 2023, we were told that we are too new to rate. The bank was opened in June 2022.

Part II. First-time Homebuyer Standard: All Federal Home Loan Bank members must complete either Section A or B of this part, except that members with "Outstanding" federal CRA ratings need not complete this part. Members should use data or activities for the previous or current calendar year in completing this part.

A. Complete the following two questions: If your institution did not make, or did not track, mortgage loans to first-time homebuyers, you must complete Section B of this part.

1. Number of mortgage loans made to first-time homebuyers

0
2. Dollar amount of mortgage loans made to first-time homebuyers

\$0

B. Check as many as applicable:

1. Offer in-house first-time homebuyer program (e.g., underwriting, marketing plans, outreach programs)

No
2. Other in-house lending products that serve first-time homebuyers or low- and moderate-income homebuyers

No
3. Offer flexible underwriting standards for first-time homebuyers

No
4. Participate in nationwide first-time homebuyer programs (e.g., Fannie Mae, Freddie Mac)

No
5. Participate in federal government programs that serve first-time homebuyers (e.g., FHA, VA, USDA RD)

No
6. Participate in state or local government programs targeted to first-time homebuyers (e.g., mortgage revenue bond financing)

No
7. Provide financial support or technical assistance to community organizations that assist first-time homebuyers

No
8. Participate in loan consortia that make loans to first-time homebuyers

No
9. Participate in or support special counseling or homeownership education targeted to first-time homebuyers

No
10. Hold investments or make loans that support first-time homebuyer programs

No
11. Hold mortgage-backed securities that may include a pool of loans to low- and moderate-income homebuyers

No
12. Use affiliated lenders, credit union service organizations, or other correspondent, brokerage or referral arrangements with specific unaffiliated lenders, that provide mortgage loans to first-time or low- and moderate-income homebuyers

No
13. Participate in the Affordable Housing Program or other targeted community investment/development programs offered by the Federal Home Loan Bank

Yes
14. Other (attach description of other activities supporting first-time homebuyers; see instructions for Part II)

No
15. None of the above (attach explanation of any mitigating factors; see instructions for Part II)

No

If you checked Question 14 or 15, please explain below. If your explanation will exceed 300 characters, please upload a file containing your explanation and supporting documents:

Please note that Legacy Bank has not yet received a CRA rating. Also note that Legacy Bank does not have a mortgage lending program. We are an approved lender under the HUD184 program, although we are only authorized to accept applications and cannot underwrite or service. We also have a financial literacy/wellness program that covers financial discipline topics such as budgeting, credit, and financial planning. This program is primarily delivered within the tribal communities. The bank does not have a CRA rating as yet. We were told that we were too new to rate.

Supporting documents:

Part III. Certification:

By submitting this Community Support Statement, I certify that I am a senior official of the above institution, that I am authorized to provide this information to FHFA, and that the information in this Statement and any attachments is accurate to the best of my knowledge.

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