

**Baker Boyer Bank  
Community Reinvestment Act  
2023 Public File**

**§25.43 Content and availability of Public File**

(a) Information available to the public: A bank shall maintain a public file that includes the following information:

1) All written comments received from the public for the current year and each of the prior two calendar years that specifically relate to the bank’s performance in helping meet the community credit needs, and any response to the comments by the bank, if neither the comments nor the responses contain statements that reflect adversely on the good name or reputation of any persons other than the bank or publication of which would violate specific provisions of law.

**No written comments were received.**

2) A copy of the public section of the bank’s most recent CRA Performance Evaluation prepared by the Office of the Comptroller of the Currency (OCC). The bank shall place this copy in the public file within 30 business days after its receipt from the Office of the Comptroller of the Currency;

**Please See Attached Copy of 2022 OCC CRA Performance Evaluation**

3) A list of the bank’s branches, their street addresses, and geographies;

| <u>Branch Name</u>       | <u>Address</u>                                | <u>Lobby &amp; Drive-Thru Hours</u>  | <u>Geocode</u> |              |               |                     |
|--------------------------|---|--|----------------|--------------|---------------|---------------------|
|                          |   |  | <u>MSA</u>     | <u>State</u> | <u>County</u> | <u>Census Tract</u> |
| <u>WW Main Branch</u>    | 7 W Main St,<br>Walla Walla, WA 99362         | <u>Lobby:</u><br>M-F – 9am – 5pm<br><u>Drive-Thru:</u><br>M-Th - 9am - 5:30pm<br>F – 9am – 6pm   | 47460          | 53           | 071           | 9206.00             |
| <u>Eastgate Branch</u>   | 1931 E Isaacs Ave,<br>Walla Walla, WA 99362   | <u>Lobby:</u><br>M-F – 9am – 5pm <i>Consumer &amp; Mortgage Clients only</i><br><u>Drive-Thru:</u><br>M-Th - 9am - 5:30pm<br>F – 9am – 6pm | 47460          | 53           | 071           | 9208.01             |
| <u>Plaza Branch</u>      | 1530 Plaza Way,<br>Walla Walla, WA 99362      | <u>Lobby:</u><br>M-F- 9am - 5pm<br><u>Drive-Thru:</u><br>M-Th - 9am - 5:30pm<br>F – 9am – 6pm  | 47460          | 53           | 071           | 9206.00             |
| <u>Wheatland Branch</u>  | 1500 Catherine St,<br>Walla Walla, WA 99362   | <u>Lobby:</u><br>M-F – 9am – 10:30am<br><i>(By Appointment)</i>  | 47460          | 53           | 071           | 9207.01             |
| <u>Tri-Cities Branch</u> | 1149 N Edison, Suite A<br>Kennewick, WA 99336 | <u>Lobby:</u><br>M-F- 9am-4pm<br><u>Drive-Thru:</u> Closed   | 28420          | 53           | 005           | 0109.01             |
| <u>Yakima Branch</u>     | 921 Seattle Slew Run,<br>Yakima, WA 98908     | <u>Lobby:</u><br>M-F- 9am-4pm<br><u>Drive-Thru:</u> None   | 49420          | 53           | 077           | 0004.01             |

**24-Hour Drive-Thru ATM Locations**

|  |   |   |
|--|---|---|
| <b><u>Walla Walla Main Branch</u></b><br>16 S 2 <sup>nd</sup> Ave<br>Walla Walla, WA 99362 | <b><u>Eastgate Branch</u></b><br>1931 E Isaacs Ave<br>Walla Walla, WA 99362 | <b><u>Plaza Branch</u></b><br>1530 Plaza Way<br>Walla Walla, WA 99362 |
|--|---|---|

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;

**June 2022 – Closure of Milton-Freewater Branch**

| <b><i>Branch Name</i></b>      | <b><i>Address</i></b>                                      | <b><i>Geocode</i></b> |                     |                      |                            |
|--------------------------------|--|-----------------------|---------------------|----------------------|----------------------------|
|                                |  | <b><i>MSA</i></b>     | <b><i>State</i></b> | <b><i>County</i></b> | <b><i>Census Tract</i></b> |
| <i>Milton Freewater Branch</i> | <i>320 N. Columbia,<br/>Milton Freewater, OR<br/>97862</i> | <i>9999</i>           | <i>41</i>           | <i>059</i>           | <i>9502.01</i>             |

5) A list of Services (including hours of operation, available loan and deposit products, and transaction fees) generally offered at the bank’s branches and descriptions of material differences in the availability or cost of services at particular branches, if any. At its option, a bank may include information regarding the availability of alternative systems for delivering retail banking services (e.g., ATMs, ATMs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs);

**Please refer to the banking services and fee schedules below as of March 2023.**

6) A map of each assessment area showing the boundaries of the area and identifying the geographies contained within the area, either in the map or in a separate list;

**Please refer to Exhibit A-1 and Exhibit A-2 below for the geography and map details.**

**The Bank’s assessment areas are located in Washington.**

**Washington:**

- Walla Walla County
- Yakima County
- Benton County
- Franklin County

7) Any other information the bank chooses.  
**N/A**

**(b) Additional information available to the public:**

1) **Banks other than small banks.** A bank, except a small bank or a bank that was a small bank during the prior calendar year shall include in its public file the following information pertaining to the bank and its affiliates, if applicable, for each of the two calendar years:

- (i) If the bank has elected to have one or more categories of its consumer loans considered under the lending test, for each of these categories, the number and amount of loans:
  - To low-, moderate-, middle-, and upper-income individuals;
  - Located in low-, moderate-, middle-, and upper-income census tracts; and
  - Located inside the bank's assessment area(s) and outside the bank's assessment area(s); and
- (ii) The Bank's CRA Disclosure Statement. The bank shall place the statement in the public file within three business days of its receipt from the OCC.

**OCC 2022 Public Disclosure included below.**

2) Banks required to report Home Mortgage Disclosure Act (HMDA) data. A bank required to report home mortgage loan data pursuant part 1003 of this title shall include in its public file a written notice that the institution's HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's (CFPB's) website at [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).

**The Bank did not receive any requests to view the Disclosure Statements in 2022.**

The Bank's Modified HMDA LAR and Disclosure Statements may be obtained from the Consumer Financial Protection Bureau's website: [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)

- Institution name: Baker Boyer National Bank
- LEI: 2549009AOX259OY87H37

3) *Small Banks.* **N/A**

4) *Banks with strategic plans.* **N/A**

5) *Banks with less than satisfactory ratings.* **N/A**

(c) Location of Public Information. A bank shall make available to the public for inspection upon request and at no cost the information required in this section as follows:

- 1) At the main office, and if an interstate bank, at one branch in each state, all information in the public file; and
- 2) At each branch:
  - (i) A copy of the public section of the bank's most recent CRA Performance Evaluation and a list of services provided by the branch; and
  - (ii) Within five calendar days of the request, all the information in the public file relating to the assessment area in which the branch is located.

(d) Copies. Upon request, a bank shall provide copies, either on paper or in another form acceptable to the person making the request, of the information in its public file. The bank may charge a reasonable fee not to exceed the cost of copying and mailing (if applicable).

(e) Updating. Except as otherwise provided in this section, a bank shall ensure that the information required by this section is current as of April 1 of each year.

# **Baker Boyer Bank**

## **COMMUNITY REINVESTMENT ACT STATEMENT**

### **CRA Statement**

Baker Boyer National Bank, headquartered in Walla Walla, Washington. Baker Boyer has six banking locations in Washington consisting of four branches in Walla Walla, and one branch each in Yakima and Kennewick, Washington. Baker Boyer National Bank is a full-service bank which is firmly committed to providing our community with a full range of quality products and services.

It is the policy of Baker Boyer National Bank to ensure proper adherence to the provisions and intent of the Community Reinvestment Act (CRA) so in order that the goals of meeting the credit needs of the communities the bank serves, including low- and moderate-income neighborhoods, are met. We are committed to serve our communities to the best of our abilities within the limits of our financial, physical, and staffing; paying heed to sound banking practices and our obligation to depositors and stockholders. The bank focuses on lending deposits locally to the people and communities within our lending area.

In order to ensure proper adherence to the provisions of the CRA, it is important to understand the methodology used by the Comptroller of the Currency, our bank regulator, for assessments of our performance. The bank receives positive consideration for home loans that we make to low- or moderate-income individuals within our primary market area (assessment area).

In addition to the direct lending to individuals described above, the bank also receives positive consideration for community development loans, investments, and services. In the context of CRA, "community development" means loans, investments, or services that the bank provides to:

- organizations or individuals that in turn provide affordable housing or other community services targeted to low- or moderate- income individuals
- small businesses or small farms (with gross revenues under \$1 million generally)

### **Nondiscrimination Policy Statement**

It is the policy of Baker Boyer National Bank to comply with the letter and spirit of all applicable federal and state consumer protection, civil rights, and fair housing laws and regulations fully and completely. Each lending officer and bank employee is required to be knowledgeable of the requirements of all such laws and regulations affecting his or her job responsibilities, and it is the affirmative duty of each officer and employee to carry out their responsibilities at all times in a manner that complies with the requirements of all such applicable laws and regulations.

Baker Boyer National Bank's lending policies, procedures, and practices will not in any way discriminate against any person on the basis of race, color, religion, national origin, sex, marital status, age (providing the applicant has the capacity to enter into a contract) or other prohibited basis. This policy of nondiscrimination covers all aspects of bank services including, in particular, the application for, consideration of, granting, servicing, and collection of extensions of credit.

## **Assessment Areas**

Baker Boyer has 3 assessment areas consisting of 6 banking locations.

- Walla Walla County, WA; MSA 47460 (4 locations)
  - Main Branch – Downtown - offers retail banking, consumer lending services and D.S. Baker Advisor services, which includes trust, investment, family advising and commercial lending services
  - Plaza, Eastgate and Wheatland - retail banking branches
- Yakima County, WA; MSA 49420 (1 location)
  - Yakima Branch - DS Baker Advisor location, which includes trust, investment, family advising and commercial lending services
- Benton and Franklin Counties, WA; MSA 28420 (1 location)
  - Kennewick Branch - DS Baker Advisor location, which includes trust, investment, family advising and commercial lending services

## **Technical Compliance**

The Bank is in compliance with the Community Reinvestment Act. The Bank maintains a program to document its efforts to determine the community development, credit, investment, and service needs of our delineated communities.

The Chief Banking Officer is charged with the management and documentation of the Bank's CRA lending efforts and is responsible for the results of the CRA Lending Test score.

The Chief Operating Officer is charged with the management and documentation of the Bank's CRA investment efforts and is responsible for the results of the CRA Investment portion of the Community Development test.

The CRA Officer provides consultation, guidance and assists in coordinating and documenting efforts to carry out the program.

The Bank's lending area is defined generally as Walla Walla, Yakima, Benton and Franklin Counties, Washington; as illustrated by the maps attached in Exhibit A. Occasionally, the Bank will extend credit to borrowers who do not reside in its established market areas; but such extensions of credit is limited.

This file, the Bank's master Community Reinvestment Act public file is maintained by the Bank's CRA Officer. It is available on the Bank's intranet, ("The Vault") and accessible by all employees as well the Bank's website and accessible to the public.

## **CRA Strategic Program**

### **Mission**

Baker Boyer is a 153-year-old independent community bank that is headquartered in Walla Walla, Washington. Our mission statement is “Family Legacies Grown Locally”.

The Bank believes in supporting the communities in which it operates through Community Development activities and through useful products and services. The Bank’s goal is to help grow, protect, and secure family legacies for generations. The Bank originates loans, provides donations, purchases investments, and renders services that promote the betterment of our economies, community infrastructures, opportunities, and education.

### **Objective**

Baker Boyer’s objective is to focus community development activities that benefit the low-to-moderate income population within the Bank’s assessment areas. The Bank strives to work with community partners to identify opportunities that provide affordable housing or community services to low-to-moderate income individuals, as well as look for activities that promote economic development, stabilization or revitalization.

Additionally, Baker Boyer seeks to empower individuals to break the cycle of low-to-moderate income subsistence. It is a long-term goal that will take careful investment into the education, health, and economic infrastructure in order to both create a new educated and healthy workforce while pairing them with careers in industries of the future that are attracted to local communities.

### **Vision**

It is the vision of Baker Boyer to continually increase the economic vitality of the communities the Bank serves in order to help everyone in the community increase their quality of life and economic circumstances. Baker Boyer’s CRA Strategic Program focuses on identifying the immediate needs of the Bank’s communities as well as to focus on long-term solutions to current socio-economic disparities. This includes working with community partners to find solutions for the immediate needs and to develop long-term solutions such as education of low-to-moderate income individuals in order to raise their long-term economic potential. Baker Boyer also looks to alleviate health burdens of low-to-moderate income individuals that hinder their economic escalation.

Additionally, to sustain a vibrant and sound economy with increasing prosperity, Baker Boyer continues to invest in other businesses and activities that add to the economic vitality of the communities the Bank serves.

## **Types of Credit Offered by Baker Boyer National Bank:**

### **Consumer**

#### **Unsecured**

When, in the loan officer's judgment, it is in the Bank's best interests to do so, the Bank will lend on an unsecured basis to consumer customers. Because unsecured loans inherently involve greater risks than secured loans, the following factors will be carefully considered by the loan officer and approved by the underwriter in making the decision:

- Credit history
- Debt ratio
- Maximum loan
- Employment
- Ability to repay

#### **Automobile Loans**

Any loan in which an automobile or truck is used as collateral is classified as an automobile loan. The Bank continues to offer both direct loans to bank customers and dealer-originated loans.

#### **Debt Consolidation Loans**

Baker Boyer National Bank makes Debt Consolidation Loans.

#### **Recreational Vehicle/Equipment Loans**

This class of loan includes campers, camp trailers, travel trailers, stock/horse trailers, boats, motor homes, motorcycles, and snowmobiles.

#### **Personal Equipment and Appliance Loans**

This type of loan is most often given for the purchase of computers, kitchen appliances or small lawn or garden equipment. As these items depreciate rapidly the term is kept short.

#### **Savings and Time Certificate of Deposit Loans**

This type of loan is considered to be 100% secured and, when properly documented, is the safest loan a bank can make. These loans are secured by savings instruments held at Baker Boyer. The Bank does not make loans against saving instruments at other institutions.

#### **Stocks and Bonds as Collateral**

Stock loans fall into two categories: those made to buy or carry margin stocks, and all other loans secured by stock. When the purpose is to buy or carry margin stock, the loan officer should refer to the Regulation U section of HPMS Volume 5 for additional guidance. For all other stock loans, compliance with this statement of policy is all the guidance needed.

#### **Aircraft**

Fixed-wing aircraft are good collateral; and, when properly made, loans usually pay as agreed.

## Real Estate

### Term Real Estate Loans

Real Estate term loans are offered for custom construction, purchase or refinance to owner occupied or non-owner occupied; secured by a first lien on 1-4 family properties including condominiums, PUD, real property manufactured homes, primary and secondary residences.

### Interim Real Estate Loans

The Bank's policy is to establish a portfolio which will assure fulfillment of the Bank's responsibilities in:

- Keeping its depositors' money safe,
- Earning sufficient income to provide adequate return on its capital, and
- Enabling our community and trade area to grow and prosper.

The extension of interim loans is considered a proper form of Commercial lending. Because this type of loan is generally very short and is paid when the project is completed, the Bank attempts to make loans of this type within the bounds of sound banking practice.

### Home Improvement Loans and Home Equity Lines of Credit

Home Improvement Loans and Home Equity Lines of Credit (HELOC) can be made for a variety of reasons including, but not limited to:

- Additions to a home, air conditioning, heating, a new roof, remodeling, swimming pools, fences, landscaping, etc.;
- Debt consolidation;
- Purchase of other assets.

The Bank offers HELOC's with an open-ended term of ten years, after which, converts to a fully amortized loan based on a maximum of a 180-month term.

### Second Mortgage Loans

Second mortgage loans are a proper loan for the Bank and often take the form of the home improvement loan discussed above.

### Land Loans

The Bank offers Land loans for commercial purposes to developers and non-developers, as well as consumer loans for various purposes.

### Manufactured Home Loans

The Bank offers manufactured home loans for the purpose of purchase or refinance in the event they are defined as real property permanently affixed to land.

### Consumer Ready Credit/ODP (Overdraft Protection)

Ready Credit or ODP is a line of credit tied directly to a customer's checking account. This type of loan is available through the Installment Loan Department. It saves the customer overdraft charges by automatically transferring funds into their checking account to cover checks if their own funds do not. It has also become an excellent tool in helping the lower income and retired borrowers who may qualify for a small loan and can afford only a small minimum monthly payment.



## Commercial

### Commercial Lines of Credit

It is our policy of the Bank to grant sound, short-term loans to local business customers that the Bank's resources permit, and opportunity affords. This is a community responsibility as well as a sound and profitable banking practice. Short-term lines of credit may be unsecured or may be secured with, among other things, accounts receivable or inventory.

### Agricultural Loans

Agricultural loans cover three basic areas:

1. Farm-Operating Lines of Credit,
2. Livestock and Equipment financing, and
3. Capital Improvements.

### Commercial Term Loans

Term loans are loans, not including qualifying real estate loans, with maturities greater than one year, which regularly amortize, and which are typically repaid from the business' cash flow.

### Business Loans

Business loans are divided into four categories:

1. Operating lines of credit,
2. Loans for equipment purchased
3. For other capital improvement, and
4. Loans to new businesses partially guaranteed by the Small Business Administration.

### Aircraft

Fixed-wing aircraft are good collateral; and, when properly made, loans usually pay as agreed.

### Commercial Ready Credit/ODP (Overdraft Protection)

Ready Credit or ODP is a line of credit tied directly to a customer's checking account. This type of loan is available through the Installment Loan Department. It saves the customer overdraft charges by automatically transferring funds into their checking account to cover checks if their own funds do not. It has also become an excellent tool in helping the lower income and retired borrowers who may qualify for a small loan and can afford only a small minimum monthly payment.

## Profile of Participation in Special Loan Categories:

### Loan Analysis

As of December 31, 2022, the total Bank deposits were \$690,845 and total net loans were \$348,019; for a loan-to-deposit ratio of 50.38%. The loan portfolio mix for each quarter end of 2022 is as follows:

| <i>Dollar amounts in thousands</i> | <b>Quarter 1<br/>3/31/2022</b> | <b>Quarter 2<br/>6/30/2022</b> | <b>Quarter 3<br/>9/30/2022</b> | <b>Quarter 4<br/>12/31/2022</b> |
|------------------------------------|--------------------------------|--------------------------------|--------------------------------|---------------------------------|
| Real Estate Loans                  | 273,606                        | 281,612                        | 282,469                        | 286,678                         |
| Commercial Loans                   | 45,663                         | 39,778                         | 40,007                         | 42,441                          |
| Individual Loans                   | 2,049                          | 2,199                          | 2,078                          | 2,567                           |
| Agricultural Loans                 | 12,587                         | 18,409                         | 16,293                         | 14,108                          |
| Other LN&LS in Domestic Offices    | 6,422                          | 6,745                          | 6,993                          | 5,643                           |
| LN&LS Allowance                    | <b>6,579</b>                   | <b>3,248</b>                   | <b>3,402</b>                   | <b>3,418</b>                    |
| <b>Net Loans &amp; Leases</b>      | <b>333,748</b>                 | <b>345,495</b>                 | <b>344,438</b>                 | <b>348,019</b>                  |
| Real Estate Loans                  | 81.98%                         | 81.51%                         | 82.01%                         | 82.37%                          |
| Commercial and Other               | 15.61%                         | 13.47%                         | 13.65%                         | 13.82%                          |
| Agricultural Loans                 | 3.77%                          | 5.33%                          | 4.73%                          | 4.05%                           |
| Installment / Individual           | 0.61%                          | 0.64%                          | 0.60%                          | 0.74%                           |
| Loan loss Allowance                | <b>1.97%</b>                   | <b>0.94%</b>                   | <b>0.99%</b>                   | <b>0.98%</b>                    |
|                                    | 100.00%                        | 100.00%                        | 100.00%                        | 100.00%                         |
| <b>Total Deposits</b>              | <b>740,751</b>                 | <b>727,793</b>                 | <b>730,898</b>                 | <b>690,845</b>                  |
|                                    | 45.06%                         | 47.47%                         | 47.13%                         | 50.38%                          |

**EXHIBIT A-1**

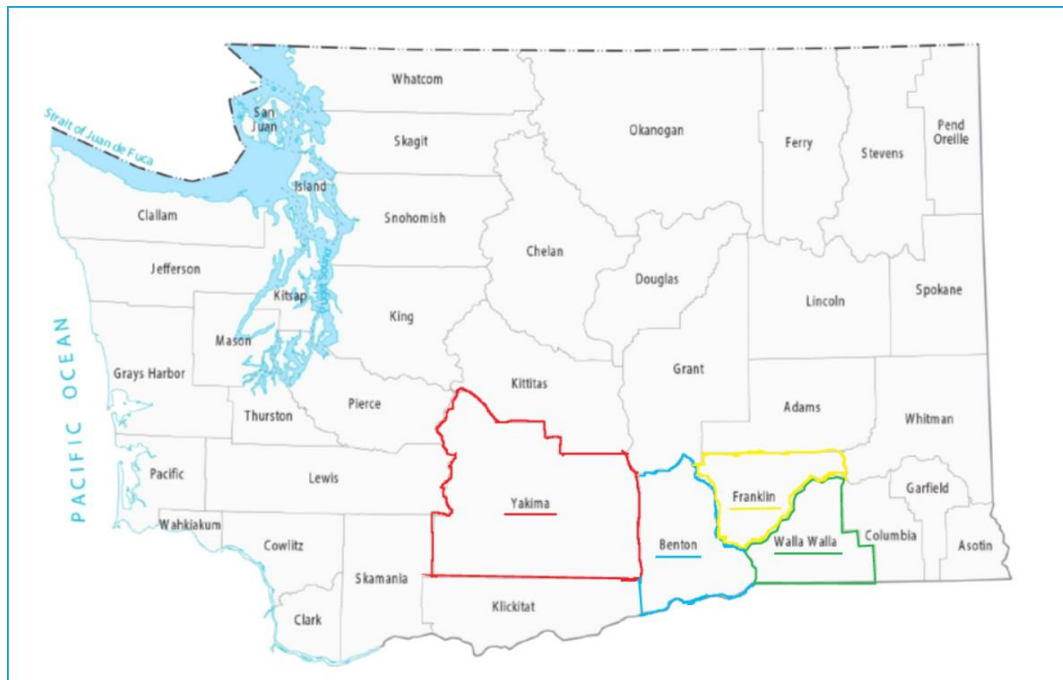
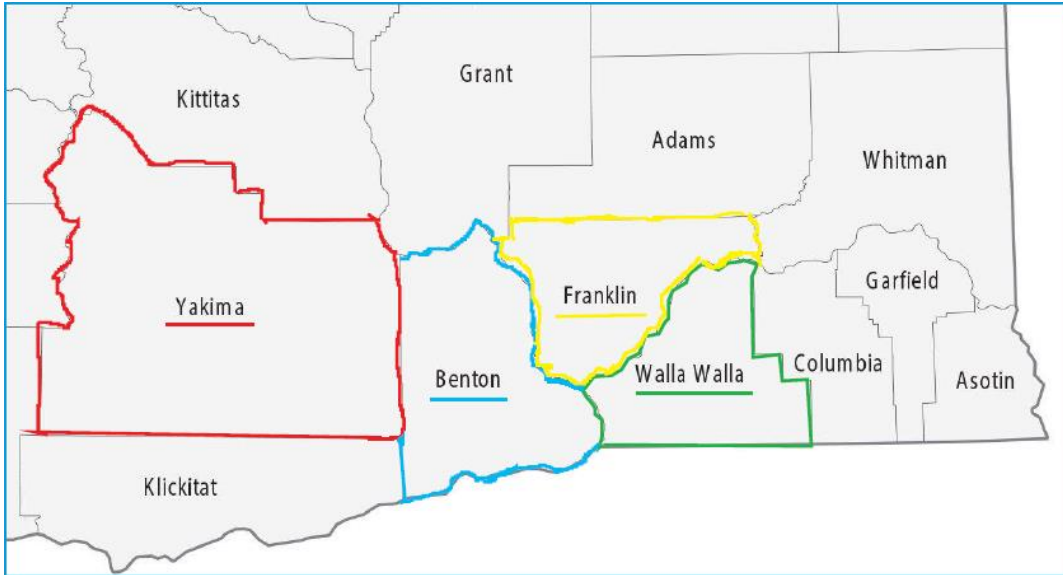
**BAKER BOYER NATIONAL BANK - ASSESSMENT AREA CENSUS TRACTS**

| Benton County<br>005<br>State 53 - MSA 28420 |         | Franklin County<br>021<br>State 53 - MSA 28420 | Walla Walla County<br>071<br>State 53 - MSA 47460 | Yakima County<br>077<br>State 53 - MSA 49420 |         |
|--|---------|--|---|--|---------|
| 0101.00                                      | 0115.05 | 0201.01  | 9200.00   | 0001.00                                      | 0020.03 |
| 0102.01                                      | 0115.06 | 0201.02  | 9201.00   | 0002.00                                      | 0020.04 |
| 0102.03                                      | 0116.00 | 0201.03  | 9202.00   | 0003.01                                      | 0020.05 |
| 0102.04                                      | 0117.01 | 0202.01  | 9203.01   | 0003.02                                      | 0020.06 |
| 0103.00                                      | 0117.02 | 0202.02  | 9203.02   | 0004.01                                      | 0021.01 |
| 0104.00                                      | 0118.01 | 0203.00  | 9204.00   | 0004.02                                      | 0021.03 |
| 0105.00                                      | 0118.02 | 0204.01  | 9205.00   | 0005.00                                      | 0021.04 |
| 0106.00                                      | 0119.00 | 0204.02  | 9206.00   | 0006.00                                      | 0022.01 |
| 0107.01                                      | 0120.00 | 0204.03  | 9207.01   | 0007.00                                      | 0022.02 |
| 0107.03                                      |         | 0204.04  | 9207.02   | 0008.00                                      | 0027.01 |
| 0107.05                                      |         | 0205.01  | 9208.01   | 0009.02                                      | 0028.01 |
| 0107.07                                      |         | 0205.03  | 9208.02   | 0009.03                                      | 0028.03 |
| 0107.08                                      |         | 0205.04  | 9209.01   | 0009.04                                      | 0028.04 |
| 0108.07                                      |         | 0206.03  | 9209.02   | 0010.00                                      | 0029.00 |
| 0108.09                                      |         | 0206.05  |   | 0011.00                                      | 0030.02 |
| 0108.10                                      |         | 0206.06  |   | 0012.01                                      | 0030.03 |
| 0108.11                                      |         | 0206.07  |   | 0012.02                                      | 0030.04 |
| 0108.14                                      |         | 0206.08  |   | 0013.00                                      | 0031.00 |
| 0108.15                                      |         | 0207.00  |   | 0014.00                                      | 0032.00 |
| 0108.16                                      |         | 0208.01  |   | 0015.02                                      | 0034.00 |
| 0108.17                                      |         | 0208.02  |   | 0015.03                                      | 9400.01 |
| 0108.18                                      |         | 9801.00  |   | 0015.04                                      | 9400.02 |
| 0108.19                                      |         |  |   | 0016.01                                      | 9400.03 |
| 0108.20                                      |         |  |   | 0016.02                                      | 9400.05 |
| 0109.01                                      |         |  |   | 0017.01                                      | 9400.02 |
| 0109.02                                      |         |  |   | 0017.02                                      | 9400.03 |
| 0110.01                                      |         |  |   | 0018.01                                      | 9400.05 |
| 0110.02                                      |         |  |   | 0018.02                                      | 9400.06 |
| 0111.00                                      |         |  |   | 0019.01                                      | 9400.07 |
|  |         |  |   | 0019.02                                      | 9400.08 |

**EXHIBIT A-2**

**COMMUNITY DELINEATION:**

Walla Walla, Yakima, Benton & Franklin Counties, Washington



## Community Reinvestment Act Notice

Under the Federal Community Reinvestment Act (CRA), the Comptroller of the Currency (OCC) evaluates our record of helping to meet the credit needs of this community, consistent with safe and sound operations. The OCC also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the OCC, and comments received from the public relating to our assessment area needs and opportunities, as well as our responses to those comments. You may review this information today by reviewing the public file which is available at [www.bakerboyer.com](http://www.bakerboyer.com).

You may also have access to the following additional information, which we will make available to you after you make a request to us: (1) A map showing the assessment area containing a select branch, which is the area in which the OCC evaluates our CRA performance for that particular community; (2) branch addresses and associated branch facilities and hours in any assessment area; (3) a list of services we provide at those locations; (4) our most recent rating in the assessment area; and (5) copies of all written comments received by us that specifically relate to the needs and opportunities of a given assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan.

At least 30 days before the beginning of each quarter, the OCC publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Deputy Comptroller, 1050 17<sup>th</sup> Street, Suite 1500, Denver, CO 80265. You may send written comments regarding the needs and opportunities of any of the bank's assessment areas to Cherie Engebretson, CRA Officer, Baker Boyer National Bank, 7 West Main, Walla Walla, WA 99362, [engebretc@bakerboyer.com](mailto:engebretc@bakerboyer.com) and Deputy Comptroller, 1050 17<sup>th</sup> Street, Suite 1500, Denver, CO 80265, [CRACOMMENTS@OCC.TREAS.GOV](mailto:CRACOMMENTS@OCC.TREAS.GOV). Your comments, together with any response by us, will be considered by the Comptroller in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Deputy Comptroller. You may also request from the Deputy Comptroller an announcement of our applications covered by the CRA filed with the Comptroller. We are an affiliate of Baker Boyer Bancorp, a bank holding company. You may request from the Federal Reserve Bank of San Francisco, 101 Market Street, San Francisco, CA 94105, and an announcement of applications covered by CRA filed by bank holding companies.

# Baker Boyer Bank

## Regulation C, Home Mortgage Disclosure Act (HMDA)

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### **Background and Purpose**

Congress enacted the Home Mortgage Disclosure Act (HMDA) in 1975 to monitor residential mortgage lending practices of financial institutions. Financial Institutions must report information concerning loan originations, loans purchased, or loans sold during the year as well as data regarding loan applications that do not result in an origination, such as denials and withdrawals. The regulation requires institutions to report lending data to their supervisory agencies on a loan-by-loan and application-by-application basis by way of a “register” reporting format.

The purpose of HMDA is to:

- Provide the public with mortgage lending data that demonstrates whether a particular financial institution is serving the housing credit needs of its community;
- Aid public officials in distributing public-sector investments and attracting private-sector investments where needed;
- Assist examiners and others in identifying potentially discriminatory lending activities; and
- Aid regulators in enforcing anti-discrimination laws and regulations.

The Consumer Financial Protection Bureau (CFPB) implements HMDA. The Office of the Comptroller of the Currency (OCC) is required to assess the bank’s HMDA compliance during regular compliance examinations. The OCC also uses HMDA data to help determine the bank’s performance under the Community Reinvestment Act (CRA).

### **Statement of Policy**

It is the policy of Baker Boyer Bank to comply with the Home Mortgage Disclosure Act and the requirements of Regulation C. The Bank’s Loan Application Register shall be completed accurately and completely and updated no less frequently than thirty days after the end of the calendar quarter in which the final action (origination of loans, denial, or withdrawn application) is taken. The bank has the option to include HELOCs and withdrawn pre-approvals in the HMDA Loan Application Register; at this time such loans will not be reported.

The Bank’s completed Loan Application Register for each calendar year shall be filed with the CFPB prior to March 1st of the following year.

The HMDA data about the Bank’s residential mortgage lending is available online through the CFPB’s website.

[The Home Mortgage Disclosure Act](#)

### **Institution name:**

Baker Boyer National Bank Respondent

LEI: 2549009AOX259OY87H37

The Master Home Mortgage Disclosure Act public file is maintained by the Compliance Department. A notice of the availability of our HMDA data is displayed in each branch lobby.

## Community Reinvestment Act - Baker Boyer Bank Employee Services 2023

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### CRA Qualified Services

Amanda Anderson, AVP Assistant HR Manager / Career Development Advisor – **Edison Elementary School PTA**. Serves on PTA by planning activities of interaction and development for the students, parents, and teachers at Edison Elementary School by providing services to low-income students and parents, while addressing the needs in the school community and planning events, fundraising and drives. Edison Elementary School is a Title 1 – Bilingual Elementary School with High Poverty School via data from Washington Office of Superintendent of Public Instruction <https://www.k12.wa.us/policy-funding/child-nutrition/child-nutrition-program-reports> Edison Elementary School at 64.2% total Free & Reduced Lunches based on 2021/2022 school year. *Serving Walla Walla County with 23.0 hours volunteered in 2022.*

Ana Meza, Private Business Banking Associate – **Walla Walla Asset Building Coalition through Blue Mountain Action Council (BMAC)**. Helped teach Elementary Schools Camp Fire after school program to children Kindergarten - 5<sup>th</sup> grade at Berney, Edison, Green Park, and Prospect Point Elementary Schools, about the importance of understanding money and saving. *Serving Walla Walla County with 7.0 hours volunteered in 2022.*

Becky Kettner, AVP Investment Advisor – **YWCA of Walla Walla - Board of Director Member**. Serve as an Executive Committee Board member and Co-Chair of the Investment Committee helping the YWCA to enriches the lives of women and their families. Volunteerism focused on supporting and promoting the Domestic Violence and Sexual Assault Resource Center: a domestic violence shelter, counseling, support groups, advocacy, information and more. Donor solicitations went to support other programs such as childcare programs and a number of community and personal enrichment programs. *Serving Walla Walla County with 78 hours volunteered in 2022.*

Brad Hansen, VP Senior Family/Trust Advisor – **Yakima Valley Memorial Foundation**. Serves as Co-Chair on a \$15 million fundraising campaign to expand Children’s Village, a comprehensive care unit for children, as well as remodeling the family birthplace unit at Yakima Valley Memorial Hospital. Provided guidance on fundraising strategy, project deliverables and timelines. Children and parents of children. Children's village focuses on children with disabilities or medical defects that require continuity of care through adulthood. The family birthplace assists with deliveries and includes the only Level 3 NICU within 150 miles of Yakima. *Serving Yakima County with 60 hours volunteered in 2022.*

Cathy Schaeffer, VP Family Advisor Manager – **Touchet School District**. Serves as Chair on the Board of Directors. Monthly meetings, open to the public, as well as work sessions, public hearings, and regular events are the activities that comprise the bulk of volunteer service in this position. The Touchet School Board is the elected authority for local school regulations, policy, programs, and procedures within the framework of state law. Responsible for translating the educational ideals, values, and goals of the community into concepts of policy. Ensure goals are set to provide long-range planning for local education; the district budget is balanced; interests are protected; and that buildings and grounds are maintained. High Poverty School via data from Washington Office of Superintendent of Public Instruction <https://www.k12.wa.us/policy-funding/child-nutrition/child-nutrition-program-reports> Touchet School District 9 at 52.4% total Free and Reduced lunches based on 2021/2022 school year. *Serving Walla Walla County with 45 hours volunteered in 2022.*

Cathy Schaeffer, VP Family Advisor Manager – **Downtown Walla Walla Foundation**. Serves as a Board of Directors member and Treasurer. The Downtown Walla Walla Foundation Board focuses on community development and maintaining a comprehensive downtown revitalization strategy implementing a balance of activities in the areas of organization, promotion, design and economic vitality. This includes coordinating with community members, businesses, local governments, and non-profit enterprises. *Serving Walla Walla County with 60 hours volunteered in 2022.*

Cathy Schaeffer, VP Family Advisor Manager – **Walla Walla Community College Foundation (WWCC)**. Serves as a Board of Directors member and Secretary, as well as member on the Investment Committee. The WWCC Foundation exists to transform student lives and the communities they serve. The WWCC Foundation's primary purpose is to raise, manage, and grant financial support in order to assure student access and educational excellence at WWCC. We do this by providing financial assistance to WWCC students; strengthening the work and services of the college, and; strategic investment to ensure that WWCC programs are "best in class." The Foundation eliminates financial barriers to students' educational dreams. Each year, Walla Walla Community College awards 500+ scholarships to students, with the average award ranging from \$900-\$1,500. *Serving Walla Walla County with 35 hours volunteered in 2022.*

Cherylyn Hoerner, AVP Loan Operations Manager – **Walla Walla Public Schools Music Boosters Organization**. Serve as Vice-President of the Board of Directors. Reviews and approves financial aid and evaluation requests for all students to be able to participate in music courses, training, competition within the Walla Walla Public School District, regardless of income or level. *Serving Walla Walla County 6 hours donated in 2022.*

Claudia Houck, VP Family Advisor – **Soroptimist Dream It \* Be It & Soroptimist of Tri-Cities**. Serve as a member of Soroptimist and Soroptimist "Dream It, Be It" program to help mentor and gives women and young girls the tools they need to achieve their education and career goals, empowering them to break cycles of poverty, violence and abuse. *Serving Benton and Franklin Counties with 29.0 hours volunteered in 2022.*

Jolene Riggs, EVP Chief Financial Officer - **The Health Center (Student Based Health Center)**. Served as President on the Board of Directors. Providing free medical, behavioral health and social-support referral services to more students than ever, operating Health Center clinics at Pioneer Middle School and Lincoln and Wa-Hi. The Health Center, is able to intervene in a variety of ways to protect and support students. They engage with students from diverse backgrounds and circumstances, providing equal opportunity to receive medical and mental health care. Primarily low income without insurance and easy access to these services. High Poverty School District via data from Washington Office of Superintendent of Public Instruction <https://www.k12.wa.us/policy-funding/child-nutrition/child-nutrition-program-reports> Walla Walla School District at 64.41% total Free and Reduced lunches based on 2021/2022 school year. *Serving Walla Walla County with 14.0 hours volunteered in 2022.*

Kain Evans, EVP Chief Technology Officer - **Valley Residential Services**. Serves on the Finance Committee and provides Information Technology consulting. Valley Residential Services provides to all low-income, supervised housing for developmentally disabled adults, transitional housing for Veteran's recovering from substance abuse, and supervised visitation, transportation, and parenting skills instruction for parents who receive services from the Washington State Department of Social and Health Services (DSHS) Division of Children and Family Services (DCFS). *Serving Walla Walla County with 10 hours volunteered in 2022.*

Lacey Braswell, VP Properties Manager & Executive Assistant – **BPO Elks Lodge #287**. Serves as a member of the Board of Directors to review financial statements, and recommend areas of improvement, spending, etc. The Elks invest in their communities through programs that help children grow up healthy and frug-free, meet the needs of today's Veteran's, and improve the quality of life. To inculcate the principles of Charity, Justice, Brotherly Love and Fidelity; to recognize a belief in God; to promote welfare and enhance the happiness of its Members; to quicken the spirit of American patriotism; to cultivate good friendship; to perpetuate itself as a fraternal organization, and to provide for its government, the Benevolent and Protective Order of Elks of the United States of America will serve the people and communities through benevolent programs, demonstrating that Elks Care and Elks Share. *Serving Walla Walla County with 30 hours volunteered in 2022.*

Lora Linn, Assistant Director of Retail Banking – **Horizon Projects Inc**. Served on the Board for Horizon Project which is a 501c3 Non-Profit that partners with Umatilla County, the State of Oregon, and the Federal Government to provide community-based care for individuals with intellectual and developmental disabilities. *Serving Umatilla County (Milton-Freewater Branch was open and in CRA Assessment Area) with 1.5 hours volunteered in 1st quarter 2022.*



Michelle Thacker, VP Cash Management Services Manager – **Athena Weston School District Budget Committee**. Serve as member of the Board. We review, amend and approve the school year budget and financial planning of school supplies, food service, teacher salaries and benefits, sports equipment, technology, transportation, etc. High Poverty School via Oregon.gov data showing Weston-Athena School District #29 at 61.56% for Free and Reduced lunches. Based on 2020/2021 school year. *Serving Umatilla County (Milton-Freewater Branch was open and in CRA Assessment Area) with 16 hours volunteered in 2<sup>nd</sup> quarter 2022.*

Rob Blethen, EVP D.S. Baker Advisors – **Blue Mountain Health Cooperative**. Serves on the Board of Directors that is a 501c3 Non-Profit that provides mental health services for Low-Income. Offers advice and financial perspective. To offer accessible mental health services to the community while creating an innovative learning environment for future providers. Create a healthier community through quality and affordable mental health care. Walk in services are completed on a by-donation basis. *Serving Walla Walla County with 8 hours volunteered in 2022.*

Sabrina Mills, Family Associate – **Second Harvest**. Volunteered to sort and package food to deliver to Low-to-Moderate-Income families and individuals. Second Harvest is a nonprofit that supplies a network of partner food banks, meal sites and other programs feeding people in need. *Serving Benton & Franklin Counties with 2 hours volunteered in 2022.*

Stephanie Rubin, AVP Private Banker – **Blue Mountain Action Council (BMAC)**. Volunteered to help pack food boxes for those in our Communities that utilize services with BMAC. BMAC is a local nonprofit serving neighbors in Southeast Washington who are experiencing poverty. They provide opportunities for individuals and families to achieve greater levels of strength, independence, and self-sufficiency. *Serving Walla Walla County with 10 hours volunteered in 2022.*

Susie Colombo, VP Family Advisor – **Blue Mountain Health Cooperative**. Helped with networking and fundraising. Blue Mountain Health Cooperative offers accessible mental health services to the community while creating an innovative learning environment for future providers. They create a healthier community through quality and affordable by-donation basis mental health care. *Serving Walla Walla County with 3 hours volunteered in 2022.*

Travis Wittnebel, AVP Business Advisor – **The Kid's Place**. Serve as the Treasurer on the Board of Directors. The Kid's Place is a non-profit childcare center offering a sliding scale for tuition based on the parents income. The Kids' Place works to increase access to high-quality early childhood education that transforms the lives of young children through play in partnership with families and teachers. *Serving Walla Walla County with 50 hours volunteered in 2022.*

Travis Wittnebel, AVP Business Advisor – **Camp Fire – Walla Walla**. Serve as the Treasurer on the Board of Directors. Camp Fire Walla Walla is a community based nonprofit organization with a mission to build caring and confident youth and future leaders. We provide quality out-of-school programming that fosters growth within the children of our community. In our After School Camp and Super Summer in the Park programs, we focus on helping children to learn, grow, explore, create, build friendships, and have fun. *Serving Walla Walla County with 80 hours volunteered in 2022.*

Yesi Lemus, Lead Universal Banker – **Mercy Corps Northwest**. Helped to assist during a local workshop and answer questions the participants had. Mercy Corps Northwest helps others learn more about their credit, create an improvement plan, and have better access to funding. From Portland to Seattle we offer credit workshops to help you get on the path to a better credit history. Once a class is completed, participants will also become eligible for a Credit Builder Loan. *Serving Walla Walla County with 1 hours volunteered in 2022.*

## Other Community Services

Jessica Long, VP Executive Project Manager & Senior Executive Assistant – **Boy Scout Troop #305**. The mission of the Boy Scouts of America is to prepare young people to make ethical and moral choices over their lifetimes by instilling in them the values of the Scout Oath and Law. Helped to assist with Boy Scout meetings as an advanced coordinator by helping to teach youth to confront any challenge with whole hearts and clear minds – to live their lives without regret, never back down, and do their very best! *Serving Walla Walla County with 24.0 hours volunteered in 2022.*

Jessica Long, VP Executive Project Manager & Senior Executive Assistant – **Cub Scout Troop #336**. Cub Scouts is for boys and girls, kindergarten to 5<sup>th</sup> grade. Serve as Den Leader to help youth develop the foundations for leadership, citizenship, and personal fitness through fun activities. Cub Scouting activities are designed for Scouting families to get in on the fun, and include exploring the outdoors, building projects, making friends, and developing a lifelong love of learning as Cub Scouts earn patches related to their grades. *Serving Walla Walla County with 24.0 hours volunteered in 2022.*

Lacey Braswell, VP Properties Manager & Executive Assistant – **BPO Elks Lodge #287**. Serves on the District Scholarship Committee, member of the Washington State Elks Association State Chairman for the Elks National Foundation. Train other lodges and members about how the Foundation works and assist in carrying out the functions of the Foundation. The Elks invest in their communities through programs that help children grow up healthy and frug-free, meet the needs of today's Veteran's, and improve the quality of life. To inculcate the principles of Charity, Justice, Brotherly Love and Fidelity; to recognize a belief in God; to promote welfare and enhance the happiness of its Members; to quicken the spirit of American patriotism; to cultivate good friendship; to perpetuate itself as a fraternal organization, and to provide for its government, the Benevolent and Protective Order of Elks of the United States of America will serve the people and communities through benevolent programs, demonstrating that Elks Care and Elks Share. *Serving Walla Walla County with 90 hours volunteered in 2022.*

Lora Linn, Assistant Director of Retail Banking – **Horizon Projects Inc.** Served on the Board for Horizon Project which is a 501c3 Non-Profit that partners with Umatilla County, the State of Oregon, and the Federal Government to provide community-based care for individuals with intellectual and developmental disabilities. *Serving Umatilla County (out of CRA Assessment Area – closed Milton-Freewater Branch June 18, 2022) with 5.0 hours volunteered in 3<sup>rd</sup> quarter 2022.*

Matt West, VP Solutions Architecture Manager – **Angel MedFlights**. Use my private plane and skills/certification as an instrument rated pilot to help those who need medical care and transportation. At Angel MedFlight, our mission revolves around our patients. We are guided by the needs of our patients and our patients' families. We put our heart and soul into everything we do to transport our patients quickly and safely to the care they require. It is our goal to deliver excellence in air medical services to every patient, with every encounter, at every stage of the process, every time. The patient is and will always be our priority. *Serving Benton and Franklin Counties with 8.0 hours volunteered in 2022.*

Michelle Thacker, VP Cash Management Services Manager – **Walla Walla Choral Society**. Sang Christmas Carols as part of the Walla Walla Choral Society at the VA Veteran's Home Facility located on the campus of the Walla Walla VA Hospital. *Serving Walla Walla County with 1.5 hours volunteered in 2022.*

Mitch Roach, VP Business Banking Advisor – **Tri-Cities Sunrise Rotary Scholarship Golf Tournament**. Proceeds from the golf tournament provide scholarships in Walla Walla, Benton, and Franklin Counties. The scholarships are geared towards a larger audience as they are not limited to the top academic students, but rather those with good grades that have been involved in extracurricular activities and done volunteer work within their communities. We later celebrate the scholarship recipients at a morning meeting specifically for that purpose and have them invite their parents and a key person from their school that helped them be successful. *Serving Walla Walla, Benton, and Franklin Counties 35.0 hours volunteered in 2022.*

Susie Colombo, VP Family Advisor – **Blue Zones Project**. Sits on the Steering Committee for the Blue Zones Project and volunteer at community events. Blue Zones Project is a community-wide, evidence-based approach to improving health and well-being that makes healthier choices easier for everyone living in Walla Walla Valley by engaging people in activities that change mindsets and habits in lasting ways, ultimately transforming the places they live, work, learn, and play. *Serving Walla Walla County 2 hours volunteered in 2022.*