



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**United National Bank
Charter Number: 17785**

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San Marino, California 91108-2046**

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated “**Satisfactory.**”

The following table indicates the performance level of **United National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	United National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The bank achieved a good level of lending activity within its assessment area (AA) despite competitive pressures and local economic conditions. The geographic distribution of small loans to business and of multifamily loans is good, as is the distribution of lending to businesses by income level of borrowers.
- Community development lending has increased and reflects an excellent responsiveness to AA credit needs in affordable housing and small business needs. This enhances the bank’s overall lending performance.
- The bank has an adequate level of qualified investments that are responsive to affordable housing needs and small business development.
- UNB provides traditional loan and deposit services that are reasonably accessible to geographies and individuals of different income levels in the bank’s assessment areas in view of its commercial lending focus.

Definitions and Common Abbreviations

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

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

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/Assessment area.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home Mortgage Loans: such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/AA.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as non-mortgage, commercial loans.

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

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

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

Description of Institution

United National Bank (UNB or the bank) opened in 1983, and is a full-service bank headquartered in San Marino, California. The bank is privately owned by a prominent Taiwanese businessman and has no American affiliates or subsidiaries. UNB's primary market is the local Asian community. The bank focuses on commercial real estate lending and serving the needs of small and medium sized businesses operating in both domestic and international markets.

The Board of Directors has designated the California Counties of Los Angeles, Orange, and Santa Clara as the bank's assessment areas. These assessment area delineations meet the legal requirements of CRA and do not arbitrarily exclude low- and moderate- income (LMI) geographies. Recently, the bank established a new assessment area in Texas. But that event was too recent to have a material impact upon UNB's performance in this evaluation period.

As of year-end 2002, the bank reported total assets of \$756 million, and net income of \$1.2 million, a return on assets of 0.16 percent. Tier one capital totaled \$53.6 million, representing 9 percent of the bank's total risk weighted assets. The bank reported \$497 million in gross loans and leases, which represents 66 percent of total assets. Commercial real estate is the largest category of loans, comprising 86 percent of the dollar volume of the loan portfolio. Loans to businesses other than those secured by real estate are 13 percent of the portfolio. Consumer lending is a minor segment of the portfolio and is done on an accommodation basis to existing customers. Deposits total \$684 million. They consist of certificates of deposit (59 percent), savings (23 percent), money market (13 percent), and demand deposits (5 percent).

Existing branches are predominately in the Los Angeles assessment area (Los Angeles AA). Los Angeles AA branches are located in the cities of Beverly Hills, Cerritos, City of Industry, San Marino, Monterey Park, San Gabriel, and Walnut. The Orange County AA branch is located in the City of Irvine. Santa Clara AA branches are located in the cities of Cupertino and San Jose. In addition, the bank has a branch in Texas.

UNB recently recognized a growing and underserved Asian market in the State of Texas, particularly in the Houston area. During 2002, UNB purchased the Central Texas Bank, located in Flatonia, Texas, with the intention of establishing operations in Houston. The bank is currently renting space in Flatonia until it can establish its Houston branch. The bank has not made loans in Texas and there has been very limited deposit taking, primarily to satisfy FDIC Insurance requirements. While this acquisition moved UNB from an intrastate bank to an interstate bank, we did not evaluate CRA performance in the Texas assessment area given its newness and the lack of significant banking activities.

UNB conducts business in highly competitive banking environments. Los Angeles is the bank's primary assessment area; the bank competes with over two hundred fifty other financial institutions in this AA. Competitors include local community banks and branches of larger regional banks. This level of competition, along with a slowing economy, has affected new business opportunities. The other assessment areas also exhibit strong competition, particularly when considering the bank's relatively small market share.

UNB received a "Satisfactory" rating at the last CRA examination, dated October 13, 1999. Currently, the bank has no legal, financial, or other factors impeding its ability to help meet the need for credit in its assessment areas.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation presents information on UNB's small business lending activities and loans for multifamily properties from October 1, 1999, through December 31, 2002. We also evaluated the bank's community development lending activities, investments, and services for the period of October 14, 1999, through May 5, 2003. Also see Appendix A.

Data Integrity

To determine the accuracy of the bank's small business loan data used in our analyses, we performed a separate data integrity examination on January 27, 2003. Additionally, during this CRA examination, we reviewed all originated and pending community development loans, investments, and services to ensure that each activity has community development as its primary purpose. We determined that the information available for small business and community development lending, investments, and services was substantially accurate for use in our assessment of the CRA performance of the bank.

Selection of Areas for Full-Scope Review

Los Angeles represents the majority of the bank's lending and deposit-taking activities. Its headquarters and most of its banking facilities are located there. Accordingly, we performed a full scope review of the Los Angeles AA. Please refer to Appendix B for a complete description of this assessment area.

Ratings

Our analysis of UNB's performance is based primarily on the performance in the Los Angeles full-scope assessment area. However, we also considered UNB's performance in the Orange County and Santa Clara assessment areas, as reflected in the tables in Appendix C. Our evaluation under the Lending Test focuses on UNB's small business loans, multifamily loans, and community development activities. The bank's home mortgage loans are not considered in our rating, as they are accommodation in nature, few in number, and primarily for existing clients.

In evaluating the volume of community development loans and investments, examiners compare the dollar volume of those activities to the bank's allocated Tier 1 Capital. This capital was allocated across UNB's assessment areas based on the percentage distribution of deposits.

Other

We reviewed contacts on file with 11 local community development organizations in the full scope assessment area. The contacts included five small business development organizations, three community development and social service organizations, and three affordable housing organizations. These contacts identified the area's major credit needs as affordable housing lending, financing of community development projects, and small business lending. The contacts also identified needs for more financial service delivery systems in low-income areas, credit counseling, grants to nonprofits, participation on loan committees of nonprofits, more flexible lending criteria, participation in SBA loan programs, and loans to businesses.

The 1995 Consolidated Plans on file with the U.S. Department of Housing and Urban Development for the City of Los Angeles and Los Angeles County state a broad range of community needs. The need for affordable housing, in particular affordable rental housing, was emphasized. Also needs for homeless shelters, job training and employment for low- and moderate-income (LMI) persons, economic development, child care for LMI families, social services and medical services for the poor, rehabilitation of public facilities, business incubators, and technical assistance to merchants' associations.

Fair Lending Review

An analysis of the most recent public comments and consumer complaint information was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending examination was performed in November 2001.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Review

UNB's performance under the lending test is rated "**High Satisfactory**". Based on a full-scope review, the bank's performance in the Los Angeles AA is good.

- The bank achieved a good level of lending activity within its assessment area despite competitive pressures and declining local economic conditions.
- The geographic distribution of small loans to business in low- and moderate-income geographies is good, and lending to businesses of different sizes is good.
- The geographic distribution of multifamily loans is good.
- UNB's community development lending performance is excellent, which positively impacts the overall Lending Test rating.

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate UNB's lending activity.

Loans to small businesses and affordable housing loans are identified as primary credit needs in the Los Angeles AA. Our evaluation of UNB's lending activity focused on small business, multifamily and community development lending. These are the bank's primary means of meeting community credit needs

Loans to small businesses account for a substantial majority of loans originated by number and dollar volume. UNB originated 296 small business loans, 34 home mortgage loans, and 5 Community Development loans in the Los Angeles AA. Of the 34 reported home mortgage loans, 27 are multifamily loans and represent a significant dollar amount of lending. The bank made a very low volume of home mortgage loans on 1-4 family dwellings and no small loans to farms. An analysis of these loans would not be meaningful.

UNB achieved a good level of lending activity as indicated by a comparison between deposit market share and rank and loan market share and rank in the full-scope assessment area. UNB was able to achieve lending market share comparable to deposit market share despite a high level of competition from other lenders. UNB competes with a variety of other lenders including large regional and multi-state financial institutions, which are more dominant in the market. As of June 30, 2001, the bank's deposit market share in the Los Angeles AA was 0.27% which ranked it 47th out of 137 reporting institutions. By comparison, the bank had a 0.44% small business loan market share by dollar volume (0.05% by number of loans) and ranked 44th out of 251 reporting lenders in 2001. Multifamily lending activity was also good. UNB ranked 43rd out of 115 reporting financial institutions, based on dollar volume.

Distribution of Loans by Income Level of Geography

Multifamily

Refer to Tables 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's multifamily loan originations.

The geographic distribution of multifamily loans is good. The bank achieved an adequate penetration of low-income census tracts, with the percentage of bank loans made in low-income census tracts being lower than the percentage of all assessment area multifamily units located in low-income census tracts. UNB had an excellent penetration of moderate-income geographies with the bank's percentage of multifamily loans in moderate-income census tracts, substantially exceeding the demographic. While the bank's market share in low-income geographies was much lower than the bank's market share in the overall multifamily market, its market share performance within moderate-income geographies greatly exceeds its overall market share and is considered to be excellent.

Small Business

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.

The geographic distribution of small loans to businesses within the Los Angeles AA is good. The bank's overall distribution of these loans in low-income tracts is adequate, and in moderate-income geographies the distribution is excellent. A total of nine percent of the small businesses located in the Los Angeles AA are located in low-income geographies. The bank made six percent of its small business loans in these low-income geographies. Small business lending in moderate-income geographies represented 28 percent of its small business lending activity. That percentage greatly exceeded the moderate-income area demographic of 17 percent.

Market share analysis supports the conclusion of good geographic distribution. UNB's market share of small business loans to borrowers located in low-income geographies matches its overall market share for all geographies and in moderate-income geographies exceeded its overall market share.

Lending Gap Analysis

We did not identify any unexplained conspicuous gaps in the geographic distribution of small business loans. Our distribution analysis did not identify any pattern of lending that arbitrarily excluded clusters of low-and moderate-income census tracts.

Inside/Outside Ratio

UNB originated a substantial majority (85 percent by number) of its CRA reportable loans in the three assessment areas. All community development loans are located within assessment areas.

Distribution of Loans by Income Level of the Borrower

Small Business

Refer to Table 11 in Appendix C for the facts and data used to evaluate the distribution of loans by income level of the borrower.

Overall, the distribution of small loans to businesses by income level of the borrower is good. The percentage of bank loans to businesses with revenues of \$1 million or less was reasonably close to the percentage of that category of businesses in the assessment area. Since UNB is one of many relatively small lenders in a market dominated by numerous large financial service providers, failure to meet the demographic can be mitigated. The market share analysis indicates that the bank's lending to businesses with annual revenues of \$1 million or less is excellent, equaling the bank's overall market share. This is even more significant considering the strong competition within the Los Angeles AA and the number of large business credit card lenders, which generate a high volume of loans with small average loan amounts in products designed to meet the needs of small businesses.

Approximately 40 percent of all small loans to businesses originated in the Los Angeles AA were in amounts of \$100 thousand or less. This is used as a proxy to determine small business lending activity, which is implied from the smaller sized loans. Using this measure, the bank's performance is poor. However, this measure is not considered as reliable as comparisons to demographics and market share. We placed more weighting on those other measures.

Community Development Lending

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of Community Development Lending activities.

Community development lending reflects an excellent responsiveness to assessment area credit needs. During the review period, UNB extended five community development loans within the Los Angeles AA, totaling \$14 million. This volume of loans equals 34 percent of the Tier One Capital attributed to the Los Angeles AA. This volume of community development lending enhances the bank's overall lending performance. Examples of UNB's community development loans are described below:

- Providing \$7.1 million in two construction loans for development of neighborhood retail shopping centers, including an entertainment complex in a designated redevelopment area of the City of Southgate. These loans qualify as community development based on revitalization and stabilization of adjacent low- and moderate-income geographies by promoting 225 employment opportunities for the local residents.
- Providing \$6.7 million for funding of 202 units of affordable housing in LMI areas of the Cities of El Monte and Los Angeles. One hundred of these units are age restricted and rent subsidized. One of the cities provided a \$500 thousand grant as equity and changed zoning requirements to facilitate construction.

Product Innovation and Flexibility

The bank offers traditional loan products, none of which are considered innovative or flexible.

Conclusion for Areas Receiving Limited-Scope Reviews

Based on the limited scope reviews, the bank's performance under the lending test in the Orange County and Santa Clara County assessment areas is not inconsistent with the bank's overall performance under the lending test.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the investment test is rated "Low Satisfactory." Based on the full-scope review, the bank's performance in the Los Angeles AA is adequate, when considering its financial capacity to make investment purchases and the opportunities available for investment. These investments are responsive to the credit needs of the assessment area. None of the investments are considered innovative or complex. Opportunities for qualified investments are somewhat limited because of the bank's small market presence and competition from several large banks. The bank made qualified investments and donations totaling \$1.5 million during the evaluation period, representing 3.6 percent of the Tier One Capital attributed to the Los Angeles AA.

Qualified investments made during the evaluation period include:

- The bank purchased Mortgage-back securities (MBS) issued by a large national corporation totaling \$1.45 million. The pool consists of a group of 13 refinanced mortgage loans made to low- and moderate-income individuals, in predominately low- and moderate-income geographies. During the prior evaluation period, the bank made a similar investment, which had a balance of \$797 thousand at the time of our review.
- Cash contributions of \$30 thousand for a variety of qualifying organizations. These include a capital injection to an affordable housing nonprofit organization, donations to educational scholarships for LMI students, and contributions to locally based health care facilities that benefit LMI communities.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Orange County and Santa Clara is significantly weaker than in the bank's primary assessment area of Los Angeles. The bank has focused their investment activity within the Los Angeles AA. However, this performance does not change the overall Investment Test rating. This is

based on the lower level of deposits, proportionate capital, and limited number of branches in the Orange AA and Santa Clara AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Low Satisfactory." Based on a full scope review, the bank's performance in the Los Angeles AA is adequate.

Retail Banking Services

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's branches are reasonably accessible to geographies, individuals, and businesses of different income levels. Although all of the bank's branches are located in middle- or upper-income census tracts, the bank has been able to achieve a good performance under the Lending Test. When assessing the bank's retail services we considered the bank's strategic focus of business lending and the business clientele, who do not require the same degree of retail banking facilities that a consumer oriented bank might. Also the bank provides courier and bank-by-mail services, which further reduces the need for its customers to be physically located near bank facilities.

The bank offers traditional loan and deposit products and services at all branches. The bank has a pool of bi-lingual personnel available to assist customers who do not speak English. Consumer products are offered generally to accommodate business customers. UNB offers international banking services for import and export financing for small businesses. The bank has established a web site that provides general information pertaining to branch locations, and bank loan and deposit products. Services are not specifically targeted towards LMI customers.

The bank operates seven full-service branches in the Los Angeles AA. Five of the seven branch offices in the Los Angeles AA are distributed throughout the San Gabriel Valley, with two branches in the East and three in the West end of the valley. The City of Industry and Cerritos branches are South of the City of Los Angeles downtown area. The Cerritos branch opened in February of 2002, in a middle-income census tract. UNB did not close any offices during the evaluation period. Each office is open Monday through Saturday, except the Beverly Hill branch is open Monday through Friday. Business hours do not vary in a way that inconveniences low- and moderate-income geographies or individuals within the assessment area. All branches are located on main boulevards and are easily accessible to all segments of the community. Automated Teller Machines are located at each of the bank's branches.

Community Development Services

UNB provides an adequate level of community development services that are specific to people and organizations within the Los Angeles AA. These services focus on providing financial and technical assistance to nonprofit organizations that serve small businesses and affordable housing interests. During the evaluation period, bank personnel have participated in various activities including:

- The bank's CRA officer is the Chief Financial Officer and serves on the Board of Directors of a local nonprofit entity that facilitates the construction and ownership of affordable housing for low- and moderate individuals in the San Gabriel Valley. In addition, the bank was successful in assisting the organization in obtaining funds under the Federal Home Loan Bank of San Francisco's Affordable Housing Program.
- The Monterey Park Branch Manager is on the loan review committee of a local Community oriented revolving loan fund that provides loans to near bankable small businesses and ongoing technical expertise.
- The San Marino Branch Manager is a Vice President of a local community service organization that raised monies to help sight impaired children of low-income families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Orange County AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the Service Test. In the Santa Clara AA the bank's performance is weaker than the bank's overall performance, due to a lack of officer involvement in community development activities. However, the limited scope of banking activities in this AA in relation to the total bank means this performance does not affect the overall performance under the Service Test. Refer to Table 15 in appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

Time Period Reviewed		
Lending Test:	October 1, 1999 to December 31, 2002	
CD Loans:	October 14, 1999 to December 31, 2002	
Investment Test:	October 14, 1999 to December 31, 2002	
Service Test	October 14, 1999 to December 31, 2002	
Financial Institution: United National Bank (UNB) San Marino, California	Products Reviewed: Small Business Loans, Community Development loans, and Investments and services.	
Affiliate(s):	Affiliate Relationship:	Products Reviewed:
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Los Angeles County Orange County Santa Clara County	Full Scope Limited Scope Limited Scope	N/A

Appendix B: Market Profiles for Full-Scope Areas

Los Angeles County Assessment Area

Demographic Information for Full Scope Area: Los Angeles County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,652	8.90	22.82	32.93	34.20	1.15
Population by Geography	8,863,164	9.02	26.69	33.93	30.17	0.19
Owner-Occupied Housing by Geography	1,440,864	2.34	14.25	34.73	48.68	0.00
Business by Geography	608,916	8.60	17.31	31.99	41.83	0.27
Farms by Geography	4,552	2.92	11.97	36.36	48.66	0.09
Family Distribution by Income Level	2,036,104	22.82	16.85	19.70	40.63	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	807,690	15.16	37.51	32.47	14.86	0.00
Median Family Income		39,035	Median Housing Value		246,159	
HUD Adjusted Median Family Income for 2002		55,100	Unemployment Rate (1990 US Census)		3.77%	
Households Below Poverty Level		11.87%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 1990 US Census and 2002 HUD updated MFI

The Los Angeles AA is a complex, highly diverse urban area that includes 80 cities and a number of unincorporated areas. Los Angeles is the largest and most rapidly growing metropolitan region in the fastest growing state in the country. Contained within this assessment area is the City of Los Angeles, which is the largest city in Southern California, with an estimated population of 3.7 million as of January 2000. The Los Angeles AA has an estimated population of 9.5 million as of January 2000, which reflects 7 percent growth above the 1990 census information in the above table.

Banking competition is strong, with 137 institutions in the assessment area competing for FDIC insured customer deposits as of June 30, 2002. Further, the top five institutions together hold 54 percent of the deposits, indicating market dominance by a few large banks. Aggregate small business loan data for 2001 shows that 248 reporting lenders competed for close to 219 thousand loans totaling about \$6.5 billion. Five institutions dominate market share with approximately 64 percent of the number of loans originated or purchased during the year. Aggregate HMDA loan data for 2001 shows 845 lenders competed for more than 846 thousand loans totaling more than \$170 billion. This loan market segment is more fragmented, with the top five lenders reporting close to 27 percent of the loans originated or purchased. There are also numerous other financial service providers operating in the assessment area who do not hold FDIC insured deposits or do not report HMDA or CRA loan data.

Major banking institutions compete in LA MA for deposits and loans. These include credit card banks, interstate banking companies, and mortgage companies. American Express Centurion, Bank of America, Capital One, Citibank, Countrywide Home Loans, Chase Manhattan Bank USA, GMAC Mortgage, Union Bank of California, Washington Mutual Bank, and Wells Fargo Bank, and other large companies compete in this market. Often such large institutions have the advantages of brand recognition and marketing power over smaller local institutions.

In the late 1980s, structural changes in the economy and other events combined to undermine the general prosperity. Defense spending cuts and other Federal decisions caused huge reductions in aerospace and defense manufacturing jobs. Other states lured away business with tax concessions and more favorable business environments. The civil disturbances in 1992 and the 1994 Northridge earthquake further aggravated the business and community problems. Despite Federal and State assistance, many of the businesses destroyed during these disturbances have not reopened. As a result, jobs were lost. This created further economic dislocations. Los Angeles MA's economy has now rebounded, and the unemployment rate has continued to decline. The Bureau of Labor Statistics reported a 5.3 percent unemployment rate for the first quarter of 2002.

The economy of is diverse. The largest sectors in order of size are services, retail and wholesale trade, manufacturing, government, and transportation. In response to concessions from other states, the motion picture industry has moved a significant amount of its production activity out of Los Angeles. Even so, Hollywood still exercises a great deal of influence in the entertainment industry. Defense and aerospace manufacturing activity is still an important source of employment. The Port of Los Angeles/Long Beach is one of the busiest ports in the nation. Los Angeles International Airport is one of the busiest airports in the nation. Continued population growth and the diverse economy create many small business opportunities within the LA MA. According to 2001 Dun & Bradstreet statistics, 84 percent of businesses located within the area have annual revenues of less than or equal to \$1 million.

There are numerous opportunities for financial institutions to participate in community development activities. There are many nonprofit organizations active in the LA AA. And local government is active in promoting and assisting a variety of community development and redevelopment activities. In January 2002, HUD announced that Los Angeles will be designated a Renewal Community eligible to share in an estimated \$17 billion in tax incentives to stimulate job growth, stimulate economic development, and create affordable housing.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of AA,” in the MA/AA column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to

businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the

number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/AA.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/assessment area. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/AA column and record the corresponding numbers and amounts in the "Qualified Investments" column.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: CALIFORNIA				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002						
MA/AA (2002):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Los Angeles County AA	83.12	34	22,453	296	78,257	0	0	5	13966	335	114,676	75.60
Limited Review:												
Orange County AA	12.34	2	1,210	47	14,339	0	0	1	250	50	15,799	18.73
Santa Clara County AA	4.53	1	625	17	7,667	0	0	0	0	18	8,292	5.67

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From October 14, 1999 to May 05, 2003.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															
Geography: CALIFORNIA															
Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002															
MA/AA:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles County AA	3	100.00	2.34	0.00	14.25	0.00	34.73	0.00	48.68	100.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Orange County AA	0	0.00	0.77	0.00	17.19	0.00	45.08	0.00	36.96	0.00	0.00	0.00	0.00	0.00	0.00
Santa Clara County AA	0	0.00	1.43	0.00	13.79	0.00	57.16	0.00	27.62	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Mortgage Data: US & PR.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/AA:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Los Angeles County AA	1	100.00	2.34	0.00	14.25	0.00	34.73	0.00	48.68	100.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Orange County AA	0	0.00	0.77	0.00	17.19	0.00	45.08	0.00	36.96	0.00	0.00	0.00	0.00	0.00	0.00	
Santa Clara County AA	0	0.00	1.43	0.00	13.79	0.00	57.16	0.00	27.62	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2001 Peer Mortgage Data: US & PR.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: CALIFORNIA				Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/AA:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Los Angeles County AA	3	100.00	2.34	0.00	14.25	33.33	34.73	0.00	48.68	66.67	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Orange County AA	0	0.00	0.77	0.00	17.19	0.00	45.08	0.00	36.96	0.00	0.00	0.00	0.00	0.00	0.00	
Santa Clara County AA	0	0.00	1.43	0.00	13.79	0.00	57.16	0.00	27.62	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2001 Peer Mortgage Data: US & PR.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002				
MA/AA:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]													
	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp							
Full Review:																								
Los Angeles County AA	27	90.00	13.57	11.11	26.09	37.04	36.99	37.04	23.33	14.81	0.23	0.12	0.37	0.19	0.10									
Limited Review:																								
Santa Clara County AA	1	3.33	5.29	0.00	33.86	100.00	53.82	0.00	7.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
Orange County AA	2	6.67	5.59	0.00	38.16	100.00	41.33	0.00	14.92	0.00	0.34	0.00	0.67	0.00	0.00	0.00								

^{*} Based on 2001 Peer Mortgage Data: US & PR.

^{**} Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

^{***} Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: CALIFORNIA															
Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002															
AA/AA:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography *				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles County AA	296	82.22	8.60	6.42	17.31	27.70	31.99	42.91	41.83	22.97	0.05	0.05	0.06	0.07	0.02
Limited Review:															
Orange County AA	47	13.06	3.65	11.63	24.87	27.91	37.42	34.88	28.64	25.58	0.03	0.00	0.04	0.03	0.02
Santa Clara County AA	17	4.72	6.10	5.88	22.46	11.76	50.02	64.71	21.17	17.65	0.02	0.04	0.01	0.02	0.03

* Based on 2001 Peer Small Business Data: US&PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
AA/AA:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans	% of Farms ^{**}	% BANK Loans						
Full Review:																
Los Angeles County AA	0	0.00	2.92	0.00	11.97	0.00	36.36	0.00	48.66	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Orange County AA	0	0.00	2.68	0.00	23.01	0.00	42.45	0.00	30.41	0.00	0.00	0.00	0.00	0.00	0.00	
Santa Clara County AA	0	0.00	4.70	0.00	22.72	0.00	53.25	0.00	19.34	0.00	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2001 Peer Small Business Data: US&PR.

^{**} Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

^{***} Source Data - Dun and Bradstreet (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share [*]				
AA/AA:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Los Angeles County AA	3	100.00	22.82	33.33	16.85	0.00	19.70	0.00	40.63	66.67	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Orange County AA	0	0.00	18.65	0.00	19.00	0.00	23.57	0.00	38.77	0.00	0.00	0.00	0.00	0.00	0.00	
Santa Clara County AA	0	0.00	18.71	0.00	18.69	0.00	23.99	0.00	38.61	0.00	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2001 Peer Mortgage Data: US & PR.

^{**} As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by BANK.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															
Geography: CALIFORNIA															
Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002															
AA/AA:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles County AA	1	100.00	22.82	0.00	16.85	0.00	19.70	0.00	40.63	100.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Orange County AA	0	0.00	18.65	0.00	19.00	0.00	23.57	0.00	38.77	0.00	0.00	0.00	0.00	0.00	0.00
Santa Clara County AA	0	0.00	18.71	0.00	18.69	0.00	23.99	0.00	38.61	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2001 Peer Mortgage Data: US & PR.

^{**} As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by BANK.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: CALIFORNIA					Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002					Market Share [*]				
AA/AA:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Los Angeles County AA	3	100.00	22.82	0.00	16.85	0.00	19.70	0.00	40.63	100.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Orange County AA	0	0.00	18.65	0.00	19.00	0.00	23.57	0.00	38.77	0.00	0.00	0.00	0.00	0.00	0.00	
Santa Clara County AA	0	0.00	18.71	0.00	18.69	0.00	23.99	0.00	38.61	0.00	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2001 Peer Mortgage Data: US & PR.

^{**} As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by BANK.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CALIFORNIA			Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002				
AA/AA:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Los Angeles County AA	296	82.22	65.69	55.07	39.53	22.64	37.84	0.05	0.05
Limited Review:									
Orange County AA	47	13.06	65.44	46.81	48.94	8.51	42.55	0.03	0.02
Santa Clara County AA	17	4.72	65.97	64.71	17.65	17.65	64.71	0.02	0.03

^{*} Based on 2001 Peer Small Business Data: US&PR.

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.06% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: CALIFORNIA									
Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002									
AA/AA:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share *	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Los Angeles County AA	0	0.00	88.77	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
Orange County AA	0	0.00	86.30	0.00	0.00	0.00	0.00	0.00	0.00
Santa Clara County AA	0	0.00	87.68	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Small Business Data: US&PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: CALIFORNIA									
Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002									
AA/AA:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
LA AA	1	631	6	1,476	7	2,107	90.58	0	0
Orange AA	1	25	2	95	3	120	5.16	0	0
Santa Clara AA	1	94	1	5	2	99	4.26	0	0

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

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: CALIFORNIA																	
Evaluation Period: OCTOBER 1, 1999 TO DECEMBER 31, 2002																	
AA/AA:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Los Angeles County AA	75.60	7	70	0.00	0.00	42.86	57.14	1	0	0	0	1	0	9.02	26.69	33.93	30.17
Limited Review:																	
Orange County AA	18.73	1	10	0.00	0.00	0.00	100.00	0	0	0	0	0	0	3.61	26.73	42.01	27.64
Santa Clara County AA	5.67	2	20	0.00	0.00	100.00	0.00	1	0	0	0	1	0	3.91	21.23	54.69	20.18