



Comptroller of the Currency
Administrator of National Banks

LARGE BANK

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**United National Bank
Charter No. 17785**

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NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

Table of Contents

General Information	1
Definitions and Common Abbreviations	2
Overall CRA Rating	4
Description of Institution	5
Scope of Evaluation	6
Fair Lending Review	7
Conclusions with Respect to Performance Tests	
Lending Test	8
Investment Test	12
Service Test	14
Appendix A: Scope of the Evaluation	A-1
Appendix B: Market Profiles for Areas Receiving Full-Scope Reviews	B-1
Appendix C: Tables of Performance Data	C-1

General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency, when examining financial institutions subject to its supervision, to use its authority to assess the 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. Upon the examination's conclusion, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of **United National Bank** prepared by the **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of **October 13, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all, of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in appendix A to 12 CFR Part 25.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten-year census and an average population of 4,000.

Community Development (CD) - Affordable 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.

Full-Scope Review - Performance under the Lending, Investment, and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

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 statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, 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 multifamily dwelling loans (five or more families), loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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

Low-Income - Income levels that are less than 50 percent of the median family income.

Median Family Income (MFI) - The median income determined by the United States 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 Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80 percent and less than 120 percent of the MFI.

Moderate-Income - Income levels that are at least 50 percent and less than 80 percent of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500,000 or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120 percent or more of the MFI.

Overall CRA Rating

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

The following table shows the performance level of **United National Bank (UNB)** 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			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Noncompliance			

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

The major factors supporting the institution’s rating are:

- UNB’s lending activity demonstrates adequate responsiveness to community needs through originating small business loans in the Los Angeles assessment area (LA MSA).
- A good geographic distribution of small business loans by income level of geography, which exceeds the demographic distribution of businesses, in moderate-income geographies.
- Community development lending reflects a good responsiveness to assessment area credit needs as they relate to affordable housing and small business needs. This enhances the weak lending performance in the LA MSA.
- A good volume of community development (CD) investments and grants approximating 4.7 percent of Tier 1 capital. These are responsive to assessment area needs such as affordable housing, small business development, and helping LMI persons.
- UNB provides banking services that are reasonably accessible to geographies and individuals of different income levels in its assessment area.
- UNB demonstrates adequate participation in CD services.
- In the Cupertino assessment area, UNB’s performance is poor under the lending, investment, and service tests

Description of Institution

United National Bank (UNB), chartered in 1983, is an independently owned community bank headquartered in San Marino, Los Angeles County, California. The bank's original office was located in Monterey Park. Today, UNB operates eight full-service branches. Six of the eight branches are located in Los Angeles County in the cities of San Marino, Monterey Park, San Gabriel, City of Industry, Walnut, and Beverly Hills. The remaining two branches are in the northern California city of Cupertino (Santa Clara County) and the southern California city of Irvine (Orange County). Management relocated the executive offices and lending administration division to San Marino in 1994 to centralize the senior management team. Since the January 1998 CRA examination, the bank opened the Walnut and Irvine branches and closed the downtown Los Angeles branch. Both new locations are in upper-income census tracts. The closed branch was in a low-income census tract.

UNB is 99.9 percent owned by Mr. Tseng-Yun Tsai, a prominent Taiwanese businessman. Mr. Tsai is the owner and chairman of Taiwan First Investment and Trust Company, a \$4 billion credit card and demand deposit financial institution in Taiwan. The bank has no operating subsidiaries or holding company.

As of June 30, 1999, UNB's net loans and leases totaled \$252 million. This represents 62 percent of UNB's total assets of \$409 million. This percentage is similar to the bank's national peer group. UNB's portfolio consisted of 55 percent commercial real estate loans, 17 percent commercial and industrial loans, 13 percent construction and development loans, 8 percent multifamily real estate loans, 5 percent residential real estate loans, and 1 percent loans to individuals. Tier 1 capital during this period totaled \$38 million. For the twelve-month period ended December 31, 1998, the bank reported net income of \$2.7 million, which yielded a return on average assets of 0.55 percent.

UNB provides a variety of traditional credit and deposit products and services to consumer and commercial clients. The bank is primarily a commercial real estate lender, with a concentration of loans secured by commercial real estate. UNB operates in a highly competitive environment. Other large Asian-oriented banks that compete with UNB include East-West Bank, Cathay Bank, General Bank, and Far East National Bank. Also, the bank faces stiff competition from branches of regional, super-regional, and interstate banks, such as Bank of America, Home Savings Bank, FSB, Washington Mutual Bank, FA, Wells Fargo Bank, NA, and Union Bank of California, NA.

Throughout the bank's history, it has operated under various regulatory agreements. However, since June 1997, the bank has no legal or financial impediments that would have prohibited it from helping to serve the credit needs of its assessment areas.

UNB was rated a "Needs to Improve" at the January 1998 CRA examination. However, since that time the bank has improved performance in key areas as discussed throughout this document.

Scope of Evaluation

Evaluation Period/Products Evaluated

We examined UNB using the large bank tests pursuant to the revised CRA regulation. The evaluation covers lending, investment, and service activities since the bank's previous January 12, 1998, CRA examination.

Our evaluation of small business loans and residential real estate loans covers the period from January 12, 1998, through September 30, 1999. The primary focus of our lending review was on small business loans since this is UNB's primary CRA loan product. HMDA loan volume, other than multi-family loans, was so small that minimal weight is given to these products. Small farm lending is nonexistent. Our review of UNB's retail banking services and community development loans, investments, and services covers the period from January 12, 1998, through October 13, 1999. Appendix A contains additional details on the scope of this Performance Evaluation (PE).

Data Integrity

We performed a data integrity review of small business loans originated between January 1, 1998, and July 28, 1999, and determined reported data is accurate. For accuracy of reporting on real estate loans we reviewed the bank's process for reporting HMDA data since there are so few loans in this product type. We determined that the review process for HMDA loan reporting would minimize the chance of errors, since all reportable loans are reviewed by the compliance/CRA officer prior to official reporting. We reviewed the accuracy of community development loan, investment, and service data during our examination and found it substantially correct.

Selection of Areas for Full-Scope Review

We performed a full-scope review only on the Los Angeles assessment area (LA MSA), since this assessment area accounted for 99 percent of reportable home mortgage, small business, and community development loans. Before this examination, the bank had designated two assessment areas within the LA MSA, known as the San Gabriel Valley assessment area and Beverly Hills assessment area. However, during the examination, the bank adopted a larger assessment area (LA MSA) that incorporates these two areas. The Cupertino assessment area received a limit-scope review. Neither a full- nor limited-scope review was conducted on the Irvine assessment area, located in Orange County, due to its late inclusion in the evaluation period.

Ratings

In arriving at UNB's overall CRA record of performance, we assessed activities under the Lending, Investment, and Service Tests in each of the assessment areas. The rating method is structured such that the bank's performance under the Lending Test carries the most weight when determining the overall rating. In rendering an overall bank rating, the greatest weight of our review rest upon the performance in the LA MSA since the substantial majority of small business and community development loans, deposits, and branches are located in this assessment area.

Fair Lending Review

In conjunction with this CRA evaluation, we also performed a fair lending examination of UNB. We reviewed policies, practices, and procedures for the lending function and conducted a loan terms and conditions review of automobile installment loans originated between January 1, 1999, and June 30, 1999. Our review consisted of comparing loan terms and conditions for approved loans to female applicants versus male applicants, single applicants versus married applicants, and unmarried joint applicants versus married joint applicants. Based on the findings of this review:

- We found no evidence of illegal discrimination or disparate treatment being applied on a prohibited basis, and no violations of fair lending laws were cited.
- UNB has a satisfactory process in place to help ensure ongoing compliance with fair lending laws.

Conclusions with Respect to Performance Tests

LENDING TEST

UNB's performance under the Lending Test is rated Low Satisfactory.

Conclusion for Areas Receiving Full-Scope Review

The above rating is based primarily on adequate performance in the LA MSA, focusing on small business and community development lending. The LA MSA accounts for a substantial majority (81 percent) of all reportable loans made within the three assessment areas of the bank. The Cupertino assessment area reflects poor performance based on minimal volumes of reportable loans including the absence of community development loans. During the evaluation period, UNB made only one small farm loan; however, the loan was not within any of the bank's assessment areas.

Lending Activity

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

Our evaluation of UNB's lending activity focused on its small business and community development lending because, after commercial real estate loans, this is the bank's primary way of meeting community credit needs. As tables 1 through 4 indicate, the bank made a low volume of reportable home mortgage loans on 1- to 4- family dwellings and no reportable small farm loans during the evaluation period. However, the mortgage loan activity reflected in the tables are also considered under community development lending because they help meet a pressing need for affordable multi-family housing for LMI individuals and families.

UNB generated a good volume of reportable lending activity during this evaluation period. UNB originated 184 reportable small business, home mortgage, and CD loans in the LA MSA. Small business loans account for the majority of loans originated by number and dollar volume. Market share by number of small business loans originated equals 0.10 percent, which compares favorably to similar sized banks in the LA MSA. Based on the number of small business loans originated, UNB ranked 53rd among 238 reporting lenders in 1998. This rank is distorted downwards by the presence of several large credit card lenders that make small business loans in Los Angeles County, but do not take deposits from the area. Considering that factor, the banks market rank for small business loans compares very favorably with its market rank of 52nd for deposits. Further, the bank's market share by dollar volume of small business loans, of 0.29 percent in 1998, exceeds its market share by dollar volume of deposits, of 0.23 percent. UNB also made a significant dollar volume of community development loans, which enhances its lending activity.

Small Business Loans

Since small business lending is an identified need in this assessment area, UNB's adequate performance in this product line carries significant weight. Four of the top lenders in the assessment area account for 64 percent of the market share for all reporting small business lenders. Performance

expectations for UNB should take into consideration this market domination by larger more sophisticated lenders including the four top lenders.

Distribution of Loans by Income Level of Geography

Refer to Table 5 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 the UNB's small business loans within the LA MSA is good. Only 9 percent of the small businesses in the LA MSA are located in low-income geographies. The bank made 4 percent of its small business loans in these low-income geographies. While the bank's performance is less than the demographic, this is mitigated by the fact that there are few low-income geographies near the bank's six branches. Moreover, small business lending activity in moderate-income geographies greatly exceeded the percentage of businesses located in those geographies. Overall, UNB was generally successful in distributing its small business loans in close proportion to the distribution of businesses located in low- and moderate-income geographies.

Market share analysis supports the conclusion of good geographic distribution. UNB's market share of small business loans to borrowers in low-income geographies is minimal. However, the bank's market share in moderate-income geographies meets its overall market share for all geographies. This indicates that within the context of its competitive environment, UNB did a good job of penetrating moderate -income geographies while not having branches located in those geographies. An analysis of UNB's small business lending for conspicuous gaps is problematic when comparing 161 loans to the 1,652 census tracts in the LA MSA. However, our distribution analysis did not identify any pattern of lending that arbitrarily excluded clusters of low- or moderate-income census tracts.

Distribution of Loans by Income Level of the Borrower

Refer to Table 10 in Appendix C for the facts and data used to evaluate the distribution of loans by income level of the borrower.

The distribution of UNB's small business loans by income level of the borrower demonstrates an adequate level of responsiveness to the credit needs of small businesses. UNB's percentage of small business loans made to businesses with revenues of \$1 million or less is higher than the aggregate percentage for all other reporting lenders within the assessment area. However, the bank's lending activity fell below the demographic of the number of businesses of that size within the assessment area. Since UNB is one of many relatively small lenders in a market dominated by numerous large financial service providers, failure to substantially meet the demographic can be mitigated. The bank's primary focus and expertise are larger commercial real estate loans over \$1 million as the bank prefers to lend in a secured position, and minimize risk. The competitive environment for small business loans makes it extremely difficult for smaller banks such as UNB to offer these types of loans on a wide scale basis due to limited marketing and human resources. However, by performing better than the aggregate percentage attained by all other reporting lenders, UNB demonstrated a good focus on lending to small businesses.

UNB's market share of small business loans made to firms with revenues of \$1 million or less equals its overall market share for all small business loans. This is another indication that the bank expended a reasonable level of effort towards satisfying the credit needs of small businesses, where community groups tell us the greatest need exists.

More than one-half of UNB's small business loans were in amounts of \$100 thousand or less. Three quarters of the small business loans originated were \$250 thousand or less. While loan size is not the most reliable indicator of a bank's success in lending to small businesses, this is an adequate percentage of loans in the smallest loan size category.

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.

During the evaluation period, UNB extended nine community development loans within the LA MSA totaling \$5.85 million. This volume of loans equals 16.6 percent of Tier 1 capital and reflects excellent responsiveness to community development lending needs in the assessment area. This volume of CD lending enhances the bank's overall lending performance. These loans include the following examples:

- Refinancing a 65-unit apartment complex, for \$1.7 million, sustaining affordable housing for low- and moderate-income tenants. The complex is located in a moderate-income geography.
- Providing financing (\$2.1 million) for purchase and improvement of affordable multifamily housing in five different moderate income census tracts that have been targeted by HUD as underserved geographical areas. These areas are designated as Urban Empowerment Zones or Enterprise Communities in the LA MSA.
- Extending a \$150 thousand construction line of credit to a non-profit organization that assists with construction of affordable housing for low- and moderate-income prospective homeowners. The prospective homeowners are required to attend classes on home purchase and ownership while donating hundreds of hours of labor constructing the home. Construction of three new homes will be completed with this financing.
- Extending a \$200 thousand construction loan to a customer for building a restaurant in conjunction with the Alhambra Redevelopment Agency. An agreement between the restaurant owner and redevelopment agency requires providing permanent jobs for at least 51 percent of the employees that are low- and moderate-income persons.
- Providing permanent financing of \$1.7 million for a retail shopping center located in a moderate-income geography. This loan provides a stabilizing effect on this area.

Product Innovation and Flexibility

UNB does not offer any innovative lending products, but demonstrated an adequate effort in providing flexible loan products. This includes development of a micro loan program with 28 loans totaling \$1.68 million, extended during the evaluation period. These loans were included in the reportable small business loans detailed in the standardized tables in Appendix C. UNB also provides an interest-free construction line-of-credit with no loan fees to the non-profit described above in the second bullet point. UNB has developed a partnership with the City of Walnut for flexible financing and assistance to businesses in Walnut for exterior structural or aesthetic improvements.

Lending Inside Versus Outside of the Assessment Area

UNB made a substantial majority of the CRA reportable loans within its assessment area. The performance of the bank is considered excellent with 81 percent of small business and community development loans made within the assessment area.

Conclusion for Areas Receiving Limited-Scope Reviews

Lending performance in the Cupertino assessment area is inconsistent with UNB's performance in the LA MSA and is considered poor. The volume of CRA reportable loans made within the Cupertino assessment area was very low, and precludes meaningful distribution analysis. The low performance in this assessment area detracts from the bank's overall performance under the Lending Test.

INVESTMENT TEST

Conclusion for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "Low Satisfactory." UNB's performance in the LA MSA is adequate when considering its financial capacity to make investment purchases and the opportunities available for investment. These investments are responsive to some of 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. However, between January 1998, and September 1999, the bank made nine qualifying investments totaling \$1.72 million, which included \$1.67 million for affordable housing and economic development. Included in the investments total are seven cash donations, equaling \$17,993, to various organizations that focus on affordable housing or other community services that target low- and moderate-income individuals. The dollar amount of qualified investments made during the evaluation period represent 4.7 percent of UNB's Tier 1 Capital. An example of qualified investments made during the evaluation period include:

- A mortgage-backed security (MBS) issued by a large national mortgage corporation. The MBS consists of a \$1.65 million pool of 14 refinanced mortgage loans made mostly to low- and moderate-income individuals or the loans are secured by residential properties in areas that are formally targeted for redevelopment. This is the largest single qualifying investment the bank has made during its existence.
- A 1998, \$5,993 cash contribution to the Federal Home Loan Bank's Affordable Housing Program (AHP). AHP projects are subsidized by the funds from AHP which helped create 31,000 units of affordable housing for very low- and moderate-income households since inception of the program in 1989. The bank does not underwrite home mortgages for the program.
- A \$5,000 cash donation to a local school for providing educational scholarships to low-income families.
- A \$3,500 cash donation to a San Gabriel Valley non-profit, affordable housing organization that facilitates construction of new homes for low- and moderate-income families. This is the same organization UNB provided a community development loan discussed in the Lending Test.
- A \$3,000 cash donation to a non-profit community organization that promotes community development activities in distressed areas of Los Angeles County.
- A \$25,000 equity investment in a CDC located in the Irvine branch's area, which encompasses Orange County. This CDC targets lending to women and minority-owned businesses in low- and moderate-income areas of Orange County.

Other qualified investments made in prior evaluation periods and are still outstanding include a \$25,000 equity investment made in 1997 in a San Gabriel Valley community development

corporation (CDC). The CDC was created to provide micro loans (\$5,000 to \$50,000) to local small businesses. The bank made a \$40,000 loan commitment to the initial loan pool. However, UNB has not funded any loans to date.

Conclusion for Areas Receiving Limited-Scope Reviews

UNB's performance under the Investment Test in the Cupertino assessment area is significantly weaker than the bank's overall performance in the LA MSA, and is considered poor. The only investment for the Cupertino assessment area is an allocation of the mortgage-backed security discussed above, as two of the mortgages were located in that assessment area.

Although the Cupertino assessment area reflects weaker performance than the LA MSA assessment area, it does not change the overall Investment Test rating. This is based on the lower level of deposits, proportionate capital, and only having one branch in Cupertino.

SERVICE TEST

Conclusion 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 LA MSA is adequate.

Retail Banking Services

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

UNB only has six branches to serve the LA MSA, consisting of 1,652 census tracts. Given the few branches and competitive banking environment, service delivery systems are reasonably accessible to geographies and individuals of different income levels within branch service areas. The Beverly Hills, San Marino, and Walnut branches are located within upper-income census tracts. The Monterey Park, San Gabriel, and City of Industry branches are all located within middle-income census tracts.

Five of the six branch offices in the LA MSA are distributed throughout the San Gabriel Valley with two branches in the east- and three in the west-end of the valley. There are two low-income and sixty-one moderate-income census tracts in this area. All of the LMI census tracts are in the west-end of the valley. The majority of these LMI census tracts border and are served by the San Gabriel and Monterey Park branches, which is supported by the high volume of lending in the moderate-income census tracts.

UNB closed its downtown Los Angeles branch in May of 1998. This branch was originally opened in November of 1988 and was the only UNB branch located within a low- or moderate-income census tract. From 1993 through 1998, the Los Angeles branch had experienced stagnant business growth with rising operating costs. In addition, during this period, deposits had remained at around \$10 million and aggregate loans had deteriorated. Consequently, earnings declined 52 percent during the period December 1996 to May 1998. Despite the bank's marketing efforts, an over saturation of banks in the immediate area made the future business growth of this branch and profitability problematic. Within walking distance of the Los Angeles branch, the number of full-service institutions had grown to more than twenty banking offices. In response to these negative trends, management decided to close this branch. UNB management does not believe the closing of this branch adversely impacted customers as the bank provided assistance to those customers choosing to move to other banks, of which few did. The bank did not receive any complaints about this closing.

Serving the eastern portion of the San Gabriel Valley, the Walnut Branch opened in September 1998. Its opening was conditioned upon the closing of the bank's Los Angeles branch as described in the preceding paragraph.

The San Marino and Walnut branches each have an automatic teller machine (ATM). Additional ATM's are scheduled to be installed and on-line at the Monterey Park and San Gabriel branch by October 31, 1999. The City of Industry branch lacks the physical capacity to house an ATM at the current location. However, once that branch moves to a new location, an attached ATM is planned.

United National Bank's business hours do not vary in a way that inconveniences low- and moderate-income geographies or individuals within this assessment area. All of the branches in the San Gabriel Valley are opened Monday through Thursday from 9:00 AM until 4:00 PM, Friday from 9:00 AM until 6:00 PM, and Saturday from 9:00 AM until 2:00 PM. The San Gabriel branch also offers banking on Sunday from 10:00 AM until 1:00 PM. The Beverly Hills branch does not offer weekend banking hours, but does provide an ATM. CRA Officer Phillip Kim indicated senior management decided to open the San Gabriel branch on Sundays because a number of local business owners expressed an interest in being able to bank on Sunday.

The bank offers a wide array of loan and deposit products and services at all branches that primarily target local small- and medium-sized businesses. Consumer products are offered generally as an accommodation to business customers. UNB offers extensive international banking services related to import/export financing for small businesses. UNB is one of the few participating lenders approved by the California Export Finance Office, providing a loan guarantee program. UNB has established a web site that provides information pertaining to: branch addresses, loan and deposit products, international banking services, and general information.

Community Development Services

UNB provides an adequate level of community development services that are specific to people and organizations within the LA MSA. CD services focus on providing financial and technical assistance to nonprofit organizations that serve small businesses and affordable housing interests. During the evaluation period, UNB officers provided the following services:

- CRA Officer Phillip Kim serves on the board for a local Community Development Corporation (CDC) that assists near-bankable small businesses within San Gabriel Valley.
- Senior Vice President Wilson Ngai serves on a loan review committee of a local CDC that assists near-bankable businesses within San Gabriel Valley. Additionally, UNB offers the CDC no-fee banking services.
- CRA Officer Phillip Kim serves on the board and is treasurer of a local nonprofit entity that facilitates the construction and ownership of affordable housing for low- and moderate-income individuals in the San Gabriel Valley.

Conclusion for Areas Receiving Limited-Scope Reviews

UNB's performance under the Service Test in the Cupertino assessment area is significantly weaker than the overall Low Satisfactory performance in the LA MSA, and is considered poor. Retail banking services are identical to the products and hours of operation offered in the San Gabriel Valley branches. No community development services are reported for the Cupertino assessment area.

Appendix A: Scope of Examination

The following table identifies the period covered, affiliate activities that were reviewed, and loan products considered in this evaluation. 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:	January 1, 1998 to September 30, 1999	
Investment Test:	January 1, 1998 to October 13, 1999	
Service Test:	January 1, 1998 to October 13, 1999	
Financial Institution		Products Reviewed
United National Bank San Marino, California		Small Business, Small Farm, Home Purchase, Refinance, and Community Development loans.
Affiliate(s)		Products Reviewed
N/A		N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Examination	Other Information
Los Angeles Assessment Area	Full-Scope	The Los Angeles MSA #4480 contains 1,652 census tracts.
Cupertino Assessment Area	Limited-Scope	The San Jose MSA #7400 contains 74 census tracts.

Appendix B: Market Profiles for Full-Scope Areas

Los Angeles Assessment Area (LA MSA)

Demographic Information for Full-Scope Area: Los Angeles Assessment Area (Los Angeles MSA # 4480)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	1,652	8.9	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	0.0
Businesses by Geography	350,001	9.30	19.40	33.46	37.53	0.31
Farms by Geography	3,092	2.91	12.16	37.65	47.09	0.19
Family Distribution by Income Level	2,036,103	22.82	16.85	19.70	40.63	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	807,668	15.16	37.51	32.47	14.86	0.0
Median Family Income	= \$39,035	Median Housing Value		= \$246,159		
HUD Adjusted Median Family Income for 1999	= \$51,300	Unemployment Rate For The Entire LA MSA as of		= 3.77%		
Households Below the Poverty Level	\$41,980 = 11.87%	December 31, 1998				

Source: 1990 U.S. Census and 1998 HUD updated MFI.

The LA MSA is a complex, highly diverse urban region, which includes 80 cities and a number of unincorporated areas within its 1,652 census tracts. Los Angeles is the largest and most rapidly growing metropolitan region in the fastest growing state in the country. Contained within this MSA is the city of Los Angeles, which is the largest city in Southern California with an estimated population of 3.6 million as of January 1994. The Housing and Urban Development Agency (HUD) estimated the 1999 Median Family Income (MFI) for this MSA at \$51,300. (*See the table above for details.*) Migration trends are also remarkable. Immigrants, both legal and undocumented have stimulated 60 percent of the growth over the last decade. Twenty-one percent of all households pay more than 30 percent of their income for housing. There are 123,280 families on the County Housing Authority Section 8 preliminary registration and waiting lists. Local governments are challenged to provide sufficient affordable housing.

Events such as the 1994 earthquake had a major impact on the supply and condition of housing in Los Angeles. According to information reported in the 1995 Consolidated Plan, 330,000 units were adversely affected. The housing market cannot keep pace with the growth in population. The shortfall between supply and demand inflated rental rates and home prices. The majority of new housing available for first-time buyers is located in outlying areas of the County, or in neighboring Counties, where the price of land is less expensive. Government regulations also provide additional barriers to affordable housing. Consequently, more multi-family housing projects are being constructed than single-family houses. Between 1977 and 1993, building permits issued for multi-family units were six times the number for single-family units.

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. Businesses were lured away by other states with tax concessions and more favorable business environments. The civil disturbances in 1992 further aggravated the business and community problems. Despite Federal and State assistance, many of the businesses destroyed during the disturbances have not reopened. As a result, jobs were lost creating further economic dislocations. However, the Los Angeles County economy has since rebounded and continues to expand at a steady pace. Job growth in the area has matched the national average in early 1999, which is the County's strongest job growth in more than 10 years. The continued lowering of the unemployment rate, which was reported as 3.77 percent by Bureau of Labor and Statistics for 1998, substantiates further evidence of this recovery. Weak areas in the local economy include downsizing in the defense industry, high business costs, low housing affordability, and the large and growing income disparities. The County's long-term outlook is good and is supported by continued growth in entertainment, tourism, international trade, and residential and commercial real estate construction.

The County's largest industries in order of importance are services, retail trade, wholesale trade, finance and real estate, manufacturing and construction. The film industry lured by concessions from other states has moved a great deal of its production activity out of Los Angeles. However, there are many business opportunities within the County. According to the recent Dun and Bradstreet statistics, 353,093 businesses and farms are located within the MSA. Of that number 232,877 of these businesses and farms have annual revenues less than \$1 million.

UNB operates six full-service branches in this MSA. These branches are located in San Marino, Monterey Park, San Gabriel, Walnut, City of Industry, and Beverly Hills. The first five mentioned previously are located in the San Gabriel Valley. Two of the four branches had operational full-service ATMs, with two more expected by November 2, 1999. The City of Industry branch will be relocating in early 2000 so an ATM will not be installed until the branch is relocated. The branches in this MSA account for 85 percent of the total deposits of the bank and 80 percent of the total loans of the bank.

UNB operates in a highly competitive banking environment within the assessment area with 224 competing financial service institutions. Approximately 116 of these institutions are headquartered in Los Angeles County. CRA Officer Phillip Kim reports that, in just two of the many local communities where branches are located within the San Gabriel Valley there are over 80 competing financial service institutions. Additionally, the bank has direct competition with some twenty-five Asian community banks of various sizes.

UNB ranks 52nd with a deposit market share of 0.23 percent when compared to other banks in Los Angeles County, using June 30, 1998 (the most recent numbers available), Federal Deposit Insurance Corporation market share report. The top ten banks on this report account for 67 percent of the market share and 910 banking offices, or 58 percent of the total banking offices in Los Angeles County.

As a part of our evaluation, we considered information obtained from contacts with various local community development organizations and housing agencies. Additionally, we obtained information from the HUD Consolidated Plans for Los Angeles. The various housing and government agencies identified the following needs:

Lending

- Start-up business loans and fixed-rate small business term loans less than \$50,000.
- Loan pool money for loans ranging from \$5,000 to \$50,000 for the “near bankable” small business.
- Short-term credit lines.
- Loans for affordable housing.

Investments

- Cash or in-kind contributions.
- Equity participations in the local community development corporations.
- Funding or donations for a “land bank”, which will provide properties for future Habitat homes.

Services

- Opportunities to participate on the board of directors and lending committees of local community development corporations.
- Financial expertise to nonprofits involved in affordable housing construction and development.

Appendix C: Explanation of Standardized Tables

Content of Standard Tables

The following is a listing and brief description of each table included in the set of standard tables. Also included is any other information that may assist the reader in interpreting the tables. Market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area 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 MSA/assessment area. High market rank is not an automatic indicator of strong (“outstanding”) performance. Market rank should be evaluated in the contextual sense.

Table 1. - Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.

Table 2. - Geographic Distribution of Home Purchase Loan Originations - 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 rank and market share information based on the most recent aggregate market data available.

Table 3. - Geographic Distribution of Home Improvement Loan Originations - See Table 2.

Table 4. - Geographic Distribution of Home Mortgage Refinance Loan Originations - See Table 2.

Table 5. - Geographic Distribution of Small Business Loan Originations - The percentage distribution of the number of small loans (<\$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 rank and market share information based on the most recent aggregate market data available.

Table 6. - Geographic Distribution of Small Farm Loan Originations - The percentage distribution of the number of small loans (<\$500 thousand) 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 rank and market share information based on the most recent aggregate market data available.

Table 7. - Borrower Distribution of Home Purchase Loan Originations - 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 MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.

Table 8. - Borrower Distribution of Home Improvement Loan Originations - See Table 7.

Table 9. - Borrower Distribution of Home Mortgage Refinance Loan Originations - See Table 7.

Table 10. - Borrower Distribution of Small Business Loan Originations - Compares the percentage distribution of the number of small loans (<\$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. The table also 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 11. - Borrower Distribution of Small Farm Loan Originations - Compares the percentage distribution of the number of small loans (<\$500 thousand) 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. The table also 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 12. - Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area. The table presents aggregate investment data, regardless as to if the investment was made during prior evaluation periods (and is still outstanding) or made during the current evaluation period. If the timing of the investments impacts the examiner's evaluation of the bank's performance under the test, such an issue should be addressed in the narrative.

Table 13. - Distribution of Branch and ATM Delivery System - Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

Table 1. Lending Volume

LENDING VOLUME												
Evaluation Period 01/12/1998 TO 09/30/1999												
MSA/Assessment Area	% of Rating Area Deposits in Assessment Area*	Home Mortgage**		Small Business		Small Farm		Community Development		Total Reported Loans		% of Rating Area Loans in Assessment Area (% of #)
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Scope												
Los Angeles MSA	100.00	14	10,022	161	33,698	0	0	4	5,848	184	43,720	99.43
Limited Scope												
Cupertino Assessment Area	0.00	0	0	1	700	0	0	0	0	1	700	0.57

* Deposit Data as of September 30, 1999

** Multifamily mortgage loans equal 64% of the number and 81% of the dollars reported. These are discussed in part under community development lending of the Lending Test.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Evaluation Period 01/12/1998 TO 09/30/1999														
MSA/Assessment Area	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Home Purchase Loans		
	% 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	#	% of Total**
Full Scope																
Los Angeles MSA	2	0	14	0	35	0	49	100	549	0.0	0.0	0.0	0.0	1	100	
Limited Scope																
Cupertino Assessment Area	0	0	12	0	64	0	24	0	0	0.0	0.0	0.0	0.0	0	0	

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home purchase loans within an MSA/Assessment Area as a % of all home purchase loans in the rating area.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Evaluation Period 01/12/1998 TO 09/30/1999														
MSA/Assessment Area	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography				Total Home Improvement Loans		
	% 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	#	% of Total**
Los Angeles MSA	2	0	14	0	35	0	49	0	0	0.0	0.0	0.0	0.0	0	0	0
Limited Scope																
Cupertino Assessment Area	0	0	12	0	64	0	24	0	0	0.0	0.0	0.0	0.0	0	0	0
Full Scope																

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Home improvement loans within an MSA/Assessment Area as a % of all home improvement loans in the rating area.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE																
Evaluation Period 01/12/1998 TO 09/30/1999																
MSA/Assessment Area	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography				Total Home Mortgage Refinance Loans		
	% 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	#	% of Total**
Full Scope																
Los Angeles MSA	2	0	14	25	0	35	25	49	50	549	0.0	0.0	0.0	0.0	4	100
Limited Scope																
Cupertino Assessment Area	0	0	12	0	0	64	0	24	0	0	0.0	0.0	0.0	0.0	0	0

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** Refinance loans within an MSA/AA as a % of all refinance loans in the rating area.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL BUSINESS		Evaluation Period 01/12/1998 TO 09/30/1999														
MSA/Assessment Area	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Small Business Loans		
	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans	% of Businesses	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope																
Los Angeles MSA	9	4	19	29	33	47	38	20	53	0.1	0.0	0.1	0.1	0.0	161	99
Limited Scope																
Cupertino Assessment Area	12	100	24	0	50	0	14	0	66	0.0	0.0	0.0	0.0	0.0	1	1

* Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

** Small Business loans within an MSA/Assessment Area as a % of all Small Business loans in the rating area.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL FARM		Evaluation Period 01/12/1998 TO 09/30/1999															
		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*				Total Loans Small Farm Loans		
		% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full Scope		3	0	12	0	38	0	47	0	210	0.0	0.0	0.0	0.0	0.0	0	0
Los Angeles MSA																	
Limited Scope		6	0	19	0	62	0	14	0	46	0.0	0.0	0.0	0.0	0.0	0	0
Cupertino Assessment Area																	

* Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.
 ** Small Farm loans within an MSA/Assessment Area as a % of all Small Farm loans in the rating area.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HMDA HOME PURCHASE		Evaluation Period 01/12/1998 TO 09/30/1999														
MSA/Assessment Area	Low-Income Borrowers % of Families	Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income*				Total Home Purchase Loans			
		% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total	
Full Scope																
Los Angeles MSA	23	0	17	0	20	0	41	100	549	0.0	0.0	0.0	0.0	0.0	1	100
Limited Scope																
Cupertino Assessment Area	18	0	20	0	24	0	38	0	0	0.0	0.0	0.0	0.0	0.0	0	0

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Evaluation Period 01/12/1998 TO 09/30/1999														
MSA/Assessment Area	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share By Borrower Income*				Total Home Improvement Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Los Angeles MSA	23	0	17	0	20	0	41	0	0	0.0	0.0	0.0	0.0	0	0	0
Limited Scope																
Cupertino Assessment Area	18	0	20	0	24	0	38	0	0	0.0	0.0	0.0	0.0	0	0	0

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Evaluation Period 01/12/1998 TO 09/30/1999														
MSA/Assessment Area	Low-Income Families		Moderate-Income Families		Middle-Income Families		Upper-Income Families		Overall Market Rank*	Market Share by Borrower Income*				Total Loans		
	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**	% of Families	% Bank Loans**		Overall	Low	Mod	Mid	Upp	#	% of Total
Full Scope																
Los Angeles MSA	23	0	17	25	0	20	25	41	50	549	0.0	0.0	0.0	0.0	4	100
Limited Scope																
Cupertino Assessment Area	18	0	20	0	0	24	0	38	0	0	0.0	0.0	0.0	0.0	0	0

* Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL BUSINESS		Evaluation Period 01/12/1998 TO 09/30/1999									
MSA/Assessment Area	Businesses With Revenues of \$1 Million or Less		% Distribution of Loans by Original Amount Regardless of Business Size		Market Share*		Total Small Business Loans				
	% Business**	% Bank Loans***	% Market Loans*	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 Million or Less	#	% of Total	
Full Scope											
Los Angeles MSA	75	51	47	100	18	25	0.1	0.1	161	94	
Limited Scope											
Cupertino Assessment Area	70	100	46	0	0	100	0.0	0.0	5	.6	

* The market consists of all other Small Business reporters in BANK's assessment area and is based on 1998 Aggregate Small Business Data only

** Businesses with revenues of \$1 million or less as a percentage of all businesses.

*** Loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No revenue information was available for 14% of small loans to businesses reported by the BANK.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL FARM		Evaluation Period 01/12/1998 TO 09/30/1999						
MSA/Assessment Area	Businesses With Revenues of \$1 Million or Less		% Distribution Loans by Original Amount Regardless of Farm Size		Market Share*		Total Small Farm Loans	
	% Farms**	% Bank Loans***	\$100,000 or less	> \$100,000 to \$250,000	All	Rev \$1 Million or Less	# % of Total	
Full Scope								
Los Angeles MSA	91	0	0	0	0.0	0.0	0	
Limited Scope								
Cupertino Assessment Area	91	0	0	0	0.0	0.0	0	

* The market consists of all other Small Farm reporters in BANK's assessment area and is based on 1998 Aggregate Small Business Data only

** As a percentage of Farms with known revenues.

*** As a percentage of loans with borrower income information available.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS											
Evaluation Period 01/12/1998 TO 09/30/1999											
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investment			Unfunded Commitments**			
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)		
Full Scope											
Los Angeles MSA	1	25	8	1,117	9	1,142	100.00	0	0		0
Limited Scope											
Cupertino Assessment Area	0	0	0	550	1	550	0.00	0	0		0

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

** "Unfunded Commitments" means legally binding commitments reported on Report of Condition Schedule L- Off-Balance Sheet Items."

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH DELIVERY SYSTEM		Evaluation Period 01/12/1998 TO 09/30/1999														
MSA/Assessment Area	Deposits % of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Branches Location of Branches by Income of Geographies (%)			# of Branch Closings	# of Branch Openings	Branch Openings/Closings Net Gain(+) / Loss(-) of Branches due to Openings / Closings			Population % of the Population within Each Geography*				
				Low (%)	Mod (%)	Upp (%)			Low	Mod	Upp	Low	Mod	Upp		
Full Scope																
Los Angeles MSA	100.00	6	75	0.00	0.00	50.00	1	1	-1 0.00	0.00	00.0	+1	9.02	26.69	33.93	30.17
Limited Scope																
Cupertino Assessment Area	0.00	0	12.5	0.00	0.00	100	0	0	0.00	0.00	0.00	0.00	0.10	19.21	63.93	16.76

* The percentage of the population in the MSA/AA that resides in these geographies.