



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

**March 31, 2001**

# **Community Reinvestment Act Performance Evaluation**

**Union Bank of California, N.A.**  
Charter Number: 21541

**400 California Street  
San Francisco, California 94104**

**Office of the Comptroller of the Currency**

**Large Bank Supervision  
250 E Street, SW, Mail Stop 6-1  
Washington, DC 20219-0001**

**NOTE: 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.**

**Table of Contents**

**GENERAL INFORMATION ..... 2**

**OVERALL CRA RATING..... 3**

**DEFINITIONS AND COMMON ABBREVIATIONS..... 3**

**DESCRIPTION OF INSTITUTION ..... 6**

**SCOPE OF THE EVALUATION ..... 8**

**FAIR LENDING REVIEW..... 9**

**STATE RATINGS**

    CALIFORNIA STATE RATING..... **9**

    WASHINGTON RATING ..... **26**

    OREGON RATING ..... **32**

    TERRITORY OF GUAM RATING ..... **41**

    COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS RATING..... **45**

**APPENDIX A: SCOPE OF EVALUATION ..... A-1**

**APPENDIX B: SUMMARY OF STATE RATINGS..... B-1**

**APPENDIX C: MARKET PROFILES FOR FULL-SCOPE AREAS ..... C-1**

**APPENDIX D: TABLES OF PERFORMANCE DATA..... D-1**

## General Information

*The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, 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 Union Bank of California, N.A. by the **Office of the Comptroller of the Currency (OCC)**, and the institution's supervisory agency, as of March 31, 2001. 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.*

**Overall CRA Rating**

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

The following table indicates the performance level of Union Bank of California, N.A. (UBOC), with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
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’s overall lending performance is good, with performance in California weighted most heavily. California’s lending activity and responsiveness to the community’s credit needs is good, as is the geographic distribution of loans. Distribution by borrower income is adequate. In addition, community development loans had a positive effect on lending performance.
- Lending performance in the state of Washington, the Territory of Guam and the Commonwealth of the Northern Mariana Islands is adequate. Performance in Oregon is good. Together, these areas represented a small percentage of the reportable loans, deposits, and branches. Performance in these areas had minimal effect on the rating of the bank.
- UBOC has an excellent level of investments that are highly responsive to assessment area (AA) needs.
- UBOC provides banking services, which are accessible to essentially all portions of the AA of the bank, and demonstrates good participation in community development services.

**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, withdrawn).

**Home Mortgage Loans** - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five

or more families) dwellings loans, 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, total number and dollar amount of investments, branch distribution).

**Low-Income** - Income levels that are less than 50% 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% and less than 120% of the MFI.

**Moderate-Income** - Income levels that are at least 50% and less than 80% 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 thousand 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% or more of the MFI.

## Description of Institution

Union Bank of California, N.A. is a wholly owned subsidiary of UnionBanCal Corporation (UBOCC), headquartered in San Francisco, CA. It is the third largest commercial bank in California and among the top thirty-five in the country. The current bank and holding company were formed on April 1, 1996 through the merger of Union Bank and The Bank of California, N.A. and its respective holding company. However, banking roots go back to 1864 and represent one of the oldest banking establishments. UBOCC is 66% owned by The Bank of Tokyo-Mitsubishi, Ltd.

UBOC is an interstate bank, covering the states of California, Oregon, Washington, the Territory of Guam, and the Commonwealth of the Northern Mariana Islands (Island of Saipan). For the state of Oregon, it has branches in only the Portland portion of the multistate MSA. As of March 31, 2001, UBOC operated 256 full service branches throughout its AAs.

As of March 31, 2001, UBOC had total assets of \$35 billion. As of the same date, total deposits were \$29 billion, with \$25 billion in domestic deposits and \$4 billion in foreign deposits. Total loans were \$25 billion, with \$24 billion in loans from domestic offices, and \$1 billion from offshore offices. The bank's total adjusted capital (Tier 1 capital allocated to domestic lending) is \$2.8 billion. The parent is comprised mainly of UBOC and has total assets of \$36 billion.

UBOC provides a wide range of credit and other products and services in its communities. The bank's loan portfolio includes significant volumes of commercial/business lending, reflective of the primary focus of both former-banking entities. Lending is directed towards all sizes of businesses. Real estate and consumer lending represent smaller lines of business. While agricultural lending is only a small portion of UBOC's total lending, the bank is one of the few major dollar volume lenders in California. From 1999 to 2001, the domestic loan portfolio showed negligible growth.

There are no legal, financial, or other factors impeding the bank's ability to help to meet credit needs in its AAs. The most recent previous evaluation of the CRA performance of the bank is dated March 31, 1998, when the bank received a "Satisfactory" rating.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

This evaluation considered UBOC's HMDA-reportable, small business, and small farm lending for the calendar years 1998, 1999, and 2000. Community development lending, community development investments, and retail and community development services were evaluated for the period beginning April 1, 1998 (the date of the previous CRA evaluation), and ending March 31, 2001. Of particular note, the bank does not generally offer home improvement loans, focusing on home equity loans instead. Thus this product has not been evaluated nor included in our analysis. This applies to all assessment areas.

### **Data Integrity**

Examiners tested the accuracy of all of the bank's reported data utilized in this evaluation. This testing revealed only minor errors, none of which made the data unreliable for analysis.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, a sample of AAs within that state were selected for full-scope reviews. For the Territory of Guam and the Commonwealth of the Northern Mariana Islands, each has only one AA. Refer to the "Scope" section under each State/Territory Rating for details regarding how the areas were selected and why they are representative.

### **Ratings**

The overall rating of the bank is a blend of the state/territory ratings. Performance in California was weighted considerably more heavily than the other AAs and drives the entire rating. Over 95% of the bank's deposits, loans, and branches are located in California.

The state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state Rating for details regarding how the areas were weighted in arriving at the overall state rating.



## **Fair Lending Review**

An analysis of three years HMDA, Small Business, and Small Farm lending data, public comments, and consumer complaint information was performed according to the OCC's risk based fair lending approach. Based on the analysis of this 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 last comprehensive fair lending exam was performed in 1998.

Ongoing analyses and previous reviews of the bank's lending practices have not revealed indications of illegal discrimination by the bank. In addition, no substantive violations of applicable fair lending laws and regulations have been identified.

## State Rating

**CRA Rating for California\*:**        **Satisfactory**  
**The Lending Test is rated:**        **High Satisfactory**  
**The Investment Test is rated:** **Outstanding**  
**The Service Test is rated:**        **High Satisfactory**

The major factors that support this rating include:

- Lending activity and responsiveness to the communities' credit needs is good, as is the geographic distribution of loans.
- The distribution of loans by borrower income is adequate.
- Community development loans and product innovation and flexibility had a positive effect in each full-scope AA.
- The bank has a very large volume of investments that are highly responsive to AA needs.
- UBOC provides banking services, which are accessible to essentially all portions of the bank's AA, and the bank demonstrates good participation in community development services.

### Description of Institution's Operations in California

UBOC is the fifth largest deposit-taking financial institution in California, with over 5% of the state's deposit base (FDIC, June 2000). Other large institutions include Bank of America (23%), Wells Fargo Bank, NA (13%), Washington Mutual Bank, FA (12%), and California Federal Bank (5%). UBOC operates 247 branches in 27 AAs within the state. Approximately 98% of UBOC's deposits and 97% of reportable loans are in California, thus driving the overall rating.

Refer to the Market Profiles for the state of California in Appendix C for detailed demographics and other contextual information for the full-scope AAs.

### Scope of the Evaluation in California

We performed full-scope reviews of six of the bank's AAs including the Los Angeles-Long Beach MSA, Oakland MSA, Orange County MSA, San Diego MSA, San Francisco MSA, and the San Jose MSA. Combined, these AAs provide over 89% of UBOC's

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\* For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

deposits in California, and UBOC has made 71% of its reportable loans in these areas. Therefore, the state ratings are primarily based on performance in these full-scope AAs. Of the full-scope AAs, Los Angeles-Long Beach MSA, San Diego MSA, Orange County MSA, and San Francisco MSA are weighted more heavily based on the percentage of reportable loans and branches located in these areas. In evaluating the bank's lending performance, most of the weight was placed on small loans to businesses compared to home mortgage lending and small loans to farms. This is based on the relative number of small loans to businesses (79%) as a percentage of the total reportable loans in the full-scope areas, as well as identified credit needs and market competition.

The limited number of home mortgage loans (21% of reportable loans) in the full-scope AAs was primarily refinance loans (50%) and home purchase (47%). Finally, less than 1% of the reportable loans are small loans to farms and these loans received virtually no weight in this analysis.

Please refer to the community profiles in Appendix B for discussion of community contacts made in these AAs.

## **LENDING TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Lending Test in California is rated "High Satisfactory."

### **Lending Activity**

Refer to Table 1 in the state of California section of Appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall lending activity is good. Performance is good in the Los Angeles-Long Beach MSA, San Diego MSA, Orange County MSA, San Francisco MSA, and San Jose MSA. Performance in the Oakland MSA is excellent.

#### *Los Angeles-Long Beach MSA*

In the Los Angeles-Long Beach MSA, the total volume of reportable loans for the period was 8,606, representing almost 19% of the California total. Of these reportable loans, 83% were small loans to businesses and 17% were home mortgage loans. Small loans to farms were insignificant in volume, and therefore not analyzed. Community development loans had a positive effect on lending activity, accounting for 4.8% of the dollar volume of reportable loans.

UBOC's lending activity is good in the Los Angeles-Long Beach MSA. Based on 1999 CRA aggregate data, the bank ranks fifth in deposit market share (5.1%) and eleventh in the number of small loans to businesses (1.8%). Because approximately 57% of the reported loans in this market are business credit card products averaging \$6 thousand,

a comparison of market share based on dollar volume is more appropriate. By dollar, UBOC's rank is sixth, with a market share of 4.2%.

Another contextual issue we considered is distortion in the bank's deposit market share in the MSA. In 1999, the bank reported \$7,620 million in total deposits for the MSA. Of these deposits, \$2,330 million (31%) represent bearer certificates of deposit, which are wholesale and solicited nationwide. Excluding these non-retail deposits reduces the bank's deposit market share to approximately 3.5%.

Based on 1999 HMDA aggregate data, the refinance loans market rank and share are very small at one hundred third and 0.14%, respectively. Home purchase loan market rank and share are similarly low at one hundred forty-sixth and 0.07%, respectively. UBOC offers mortgage loans through their branch network, but does not accept brokered loans and does not actively compete in this competitive market of over 800 financial institutions.

### *San Diego MSA*

In the San Diego MSA, total reportable loans were 11,802, representing almost 26% of the California total. Of these, 79% are small loans to businesses, and 21% are home mortgage loans. Of the mortgage loans, 50% are refinance and 49% are home purchase loans. Community development loans had a positive effect on lending activity, accounting for 2.8% of the dollar volume of reportable loans.

Lending activity in the San Diego MSA is good. UBOC ranks fourth in deposit market share (9.3%) and fourth in the number of small loans to businesses (7.9%). Based on dollar volumes, UBOC's rank is third with a market share of 11.0%. Because of the volume of small business credit card reporters (44%), the dollar rank and share is a more appropriate comparison to the deposits.

The market rank and share for UBOC's refinance loans is fifty-fifth and 0.4%, respectively. For home purchase loans, UBOC's rank is fifty-first with a market share of 0.4%. Competition for these products is strong in this market, with over 500 financial institutions offering these products.

### *Orange County MSA*

In the Orange County MSA, total reportable loans were 6,125, representing over 13% of the California total. Of these loans, 82% are small loans to businesses, and 18% are home mortgage loans. Of the small number of mortgage loans, 52% are refinance and 46% are home purchase loans. Community development loans had a slight effect on lending activity, accounting for 1.6% of the dollar volume of reportable loans.

Lending activity in the Orange County MSA is good. UBOC ranks fifth in deposit market share (4.4%) and sixth in the number of small loans to businesses (3.7%). Based on dollar volumes, UBOC's rank is fourth and market share is 6.4%. Because of the small

business credit card reporters (51% of number of loans), the dollar rank and share is a more appropriate comparison to the deposits.

The market rank and share for UBOC's refinance loans is eightieth and 0.2%, respectively. For home purchase loans, UBOC's rank is ninety-second with a market share of 0.2%. Competition for these products is strong in this market, with over 500 financial institutions offering these products.

### *San Francisco MSA*

In the San Francisco MSA, total reportable loans were 2,647, representing almost 6% of the California total. Of these loans, 74% are small loans to businesses, and 25% are home mortgage loans. Of the number of mortgage loans, 46% are refinance and 53% are home purchase loans. Community development loans had a positive effect on lending activity, accounting for 2.7% of the dollar volume of reportable loans.

Lending activity in the San Francisco MSA is good. UBOC ranks third in deposit market share (7.9%) and ninth in the number of small loans to businesses (2.1%). Based on dollar volumes, UBOC's rank is third and market share is 7.6%. Because of the small business credit card reporters (47% of number of loans), the dollar rank and share is a more appropriate comparison to the deposits.

The market rank and share for UBOC's refinance loans is seventy-fifth and 0.2%, respectively. For home purchase loans, UBOC's rank is sixty-first with a market share of 0.3%. Competition for these products is strong in this market, with over 400 financial institutions offering these products.

### *Oakland MSA*

In the Oakland MSA, total reportable loans were 2,018, representing over 4% of the California total. Of these loans, 73% are small loans to businesses, and 26% are home mortgage loans. Of the number of mortgage loans, 44% are refinance and 54% are home purchase loans. Community development loans had a positive effect on lending activity, accounting for 7.7% of the dollar volume of reportable loans.

Lending activity in the Oakland MSA is excellent. UBOC ranks tenth in deposit market share (1.5%) and eleventh in the number of small loans to businesses (1.6%). Based on dollar volumes, UBOC's rank is fifth and market share is 4.8%. Because of the small business credit card reporters (51% of number of loans), the dollar rank and share is a more appropriate comparison to the deposits.

The market rank and share for UBOC's refinance loans is one hundred twenty-ninth and 0.07%, respectively. For home purchase loans, UBOC's rank is one hundred twenty-second with a market share of 0.06%. Competition for these products is strong in this market, with over 500 financial institutions offering these products.

### *San Jose MSA*

In the San Jose MSA, total reportable loans were 1,859, representing 4% of the California total. Of these loans, 68% are small loans to businesses, and 32% are home mortgage loans. Of the number of mortgage loans, 50% are refinance and 49% are home purchase loans. Community development loans had a positive effect on lending activity, accounting for 14.5% of the dollar volume of reportable loans.

Lending activity in the San Jose MSA is good. UBOC ranks eighth in deposit market share (3.2%) and tenth in the number of small loans to businesses (1.9%). Based on dollar volumes, UBOC's rank is sixth and market share is 4.4%. Because of the small business credit card reporters (52% of number of loans), the dollar rank and share is a more appropriate comparison to the deposits.

The market rank and share for UBOC's refinance loans is one hundred tenth and 0.09%, respectively. For home purchase loans, UBOC's rank is ninety-second with a market share of 0.11%. Competition for these products is strong in this market, with over 400 financial institutions offering these products.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans is good. As noted previously, small loans to businesses are weighted more heavily in this analysis. Performance in the San Francisco MSA is excellent. In the Los Angeles-Long Beach MSA, San Diego MSA, Orange County MSA, Oakland MSA, and San Jose MSA, performance is good.

#### ***Small Loans to Businesses***

Refer to Table 5 in the state of California section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Performance in the Los Angeles-Long Beach MSA is good. The geographic distribution of small loans to businesses in low-income geographies is good, as the percentage of loans is near to the percentage of businesses located in those geographies. UBOC's 1999 market share in the low-income geographies also exceeds their overall market share. In moderate-income geographies, performance is adequate, with the percentage of loans below the percentage of businesses, and market share substantially meeting the overall market share.

Performance in the San Diego MSA is good. The geographic distribution of small loans to businesses in both the low-income and moderate-income geographies is good, as the percentage of loans is near to the percentage of businesses located in those geographies. UBOC's 1999 market share in the low-income and moderate-income geographies exceeds their overall market share.

Performance in the Orange County MSA is good. The geographic distribution of small loans to businesses in low-income geographies is adequate, as the percentage of loans

is below the percentage of businesses located in those geographies. UBOC's 1999 market share in the low-income geographies substantially meets their overall market share. In moderate-income geographies, performance is good, with the percentage of loans near to the percentage of businesses, and market share exceeding the overall market share.

Performance in the San Francisco MSA is excellent. The geographic distribution of small loans to businesses in both the low-income and moderate-income geographies is excellent, as the percentage of loans exceeds the percentage of businesses located in those geographies. UBOC's 1999 market share in the low-income and moderate-income geographies also exceeds their overall market share.

Performance in the Oakland MSA is good. The geographic distribution of small loans to businesses in low-income geographies is excellent, as the percentage of loans exceeds the percentage of businesses located in those geographies. UBOC's 1999 market share in the low-income geographies also exceeds their overall market share. In moderate-income geographies, performance is adequate, with the percentage of loans below the percentage of businesses, and market share below the overall market share.

Performance in the San Jose MSA is good. The geographic distribution of small loans to businesses in low-income geographies is adequate, as the percentage of loans is below the percentage of businesses located in those geographies. UBOC's market share in the low-income geographies is below their overall market share. In moderate-income geographies, performance is excellent, with the percentage of loans exceeding the percentage of businesses, and market share exceeding the overall market share.

### ***Home Mortgage Loans***

Refer to Tables 2, 3 and 4 in the state of California section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The geographic distribution of mortgage loans in the Los Angeles-Long Beach MSA is poor. For both refinance and home purchase loan products, the percentage of loans in LMI geographies is below the respective percentage of owner-occupied units. In addition, the market share in the LMI geographies is below the overall market share for both products, except for home purchase loans in low-income geographies (equals overall market share).

The geographic distribution of mortgage loans in the San Diego MSA is excellent. The percentage of refinance and home purchase loans in low- and moderate- income geographies generally exceeds the respective percentages of owner-occupied units. (In the moderate-income geographies, the distribution of refinance loans is near to the percentage of owner-occupied units). For both products, the bank's market share in LMI geographies exceeds their overall market share.

The geographic distribution of mortgage loans in the Orange County MSA is poor. For both the refinance and home purchase loan products, the percentage of loans in low- and moderate- income geographies is below the respective percentages of owner-occupied units. In addition, the market share in the LMI geographies is below the overall market share for refinance loans. The moderate-income market share for home purchase loans exceeds the overall market share, but the low-income market share is below the overall market share.

The geographic distribution of mortgage loans in the San Francisco MSA is good. The percentage of refinance loans in low-income geographies is below the percentage of owner-occupied units, and the low-income market share is below the overall market share. In the moderate-income geographies, the distribution of refinance loans exceeds the percentage of owner-occupied units. The percentage distribution of home purchase loans exceeds the percentage of owner-occupied units in both the low - and moderate-income geographies. Market share in low-income geographies exceeds the overall market share, but is below in the moderate-income geographies.

The geographic distribution of mortgage loans in the Oakland MSA is poor. For both the refinance and home purchase loan products, the percentage of loans in LMI geographies is below the respective percentages of owner-occupied units. In addition, the market share in the low-income geographies is below the overall market share for both products. Market share in the moderate-income geographies is below the overall market share for refinance loans, and exceeds the overall market share for home purchase loans.

The geographic distribution of mortgage loans in the San Jose MSA is good. The percentage of refinance loans in low-income communities is near to the percentage of owner-occupied units, but is below the percentage of owner-occupied units in moderate-income geographies. The low-income market share exceeds the overall market share while the moderate-income market share falls below the overall market share. The distribution of home purchase loans is near to the percentage of owner-occupied units in low-income geographies, and exceeds the percentage in moderate-income geographies. The LMI market shares show a similar correlation to the overall market share.

### ***Lending Gap Analysis***

Analysis of the bank's overall lending activity did not reveal any unexplained conspicuous gaps in the geographic distribution of loans that warrant concern. We focused on the full-scope AAs, and the distribution of small business loans.

### ***Inside/Outside Ratio***

A substantial majority of the bank's originations and purchases were within its AAs. During the three-year evaluation period, 98% of the bank's loans to small businesses, and 99% of the bank's home mortgage loans were originated within the AAs.



## **Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution of the bank's lending is adequate. This conclusion is consistent for each of the bank's six full-scope AAs. Greater weight was given to loans to small businesses based on their volume and the bank's business strategy.

### ***Small Loans to Businesses***

Refer to Table 10 in the state of California section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is adequate in the Los Angeles-Long Beach MSA, San Diego MSA, Orange County MSA, San Francisco MSA, Oakland MSA, and the San Jose MSA. In the full-scope areas, the bank's percentage of loans made to small businesses (businesses with annual revenues of \$1 million or less) is below the percentage of businesses defined as such. In the San Diego MSA, the bank's market share of such loans exceeds their overall market share. In the other full-scope MSAs, the bank's market share substantially meets the overall market share of the bank.

### ***Home Mortgage Loans***

Refer to Tables 7, 8 and 9 in the state of California section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The high cost of housing in California is a performance context issue that impacts the analysis of the bank's performance in this category. Coupled with poverty levels in each of the bank's full scope AAs, it makes lending to low-income borrowers extremely difficult. In addition, basic affordability for moderate-income borrowers, in comparison to the median cost of housing, makes it difficult for a lender to reach market parity. The result is that we have modestly relaxed our expectations in comparing the bank's performance to market demographics and have placed more weight on market performance.

The borrower distribution of home mortgage loans in the Los Angeles MSA is adequate. The percentage of home purchase and refinance loans to low-and moderate-income families is below that percentage of families in those categories. However, the bank's market share of loans to these families generally exceeds their overall market share. The exception is the market share of home purchase loans to low-income families, which is below the overall market share.

The borrower distribution of home mortgage loans in the San Diego MSA is excellent. The percentage distribution of home purchase and refinance loans to low-income families is below the percent of families, but the bank's market share to low-income families exceeds the overall market share. Home purchase and refinance loans to

moderate-income families exceed the percentage of families, and the bank's market share exceeds the overall market share for moderate-income families.

Borrower distribution in the Orange County MSA and San Jose MSA is good. In both areas, the percentage of home purchase loans to LMI families is below the percentage of families. In addition, the market share for LMI geographies exceeds the bank's overall market share. The distribution of refinance loans to LMI families is generally below the percentage of families, except in San Jose where the distribution percentage exceeds the percent of families in the moderate-income geographies. The market shares in LMI geographies exceed the overall market share except in the Orange County MSA, where the market share in moderate-income geographies is below the overall market share.

The borrower distribution of home mortgage loans in the San Francisco MSA is adequate. The distribution of home purchase and refinance in both the LMI geographies is below the percentage of families. The market share for each product in low-income geographies exceeds the overall market share, but is below the overall market share in moderate-income geographies.

The borrower distribution of home mortgage loans in the Oakland MSA is adequate. The distribution of home purchase is below the percentage of families in low-income geographies, and near to the percentage of families in moderate-income areas. The market share in the LMI geographies exceeds the bank's overall market share. The distribution of refinance loans is below the percentage of families in the low- and moderate-income geographies. The market share of refinance loans exceeds the bank's market share in low-income geographies and is below the percentage in moderate-income geographies.

### **Community Development Lending**

Refer to Table 1 in the state of California section of Appendix D for the facts and data used to evaluate the bank's level of community development (CD) lending.

CD lending in California had a positive impact upon the bank's performance in each full scope AA. The level and nature of CD lending activity is excellent overall. The bank placed much of its CD loan emphasis on affordable housing, a primary need identified in each of UBOC's full scope AAs.

During the evaluation period, UBOC provided a significant quantity of CD lending relative to the portion of Tier One Capital allocated to each AA\*. These CD loans were extremely responsive by creating hundreds of affordable housing units to low- and moderate-income persons throughout the bank's AAs. Community development lending performance is excellent in the Los Angeles-Long Beach MSA (12% of allocated Tier One Capital), San Francisco MSA (7%), Oakland MSA (20%), and San Jose MSA

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\* In California, examiners allocated Tier One Capital based on a blended percentage of the bank's reportable loans and the number of branches in each assessment area. In Washington, Oregon, and the Territories of Guam and Saipan, examiners also considered the percentage of deposits in each assessment area.

(41%). In the San Diego MSA (6%) and Orange County MSA (4%), performance is good. Highlighted below are examples of the bank's CD loan activity.

- In the Los Angeles-Long Beach MSA, UBOC provided \$1.85 million in construction financing for a 55-unit, single-room occupancy complex in Los Angeles, California. The project is targeted to homeless persons and qualifies for Housing and Urban Development program financing with rents at very low levels.
- In the San Diego MSA, UBOC provided \$9.5 million in construction financing for a 168-unit affordable housing multifamily project. The subject rents are well below market levels and families targeted are those earning, on average, less than 40% of the area median income.
- In the Orange County MSA, UBOC provided \$5.2 million in construction financing for a 269-unit affordable housing apartment complex. The project is a rehabilitation initiative in which most of the units target very low- income families earning on average, 49% of the area median income. Rents are restricted as well to an average 17.5% below market levels.
- In the San Francisco MSA, UBOC provided \$6.5 million in bridge financing for an 81-unit affordable housing apartment complex. All of the units are restricted to families earning no more than 60% of the area median income and rents are on average, 33% below market levels.
- In the Oakland MSA, UBOC provided \$8.9 million in construction financing for a 148-unit affordable housing apartment complex. According to the City of Concord Housing Department, demand for low-income rental units is significant. The project's rents are below market levels and incomes are restricted, on average, to 54% of the area median income.

Also in the Oakland MSA, UBOC provided \$7.8 million in construction financing for a 60-unit affordable housing apartment complex in Fremont, California. Demand for affordable housing there has been acutely strong. The project targets low-income families, facilitated through rent restrictions.

- In the San Jose MSA, UBOC provided \$19.8 million in construction financing for a 148-unit affordable housing apartment complex. Of the units, 79% are targeted to low-income families and rents are at 42% below market rents.

The bank also provided for consideration nine letters of credit totaling \$78 million that have qualified CD purposes. All of these letters of credit support affordable housing in the AAs.

### **Product Innovation and Flexibility**

The bank's product flexibility had a positive impact on the Lending Test conclusions. UBOC offers flexible loan products designed to address the AA's needs for affordable

housing as well as small business development. In the time provided, the bank was not able to provide the specific loan amounts by AA and state, so we applied the same distribution as noted for total reportable loans. Ninety-seven percent of the bank's total reportable loans are within California, with 69% within the state's full scope AAs. Washington has 1.3% of the total reportable loans and Oregon has 1.3%. The flexible loan products are not offered in Guam or Saipan.

The bank Programs for affordable housing include the Economic Opportunity Mortgage (EOM), Mortgage Credit Certificates, and the Community Home Buyer Program. Programs for small business development include the Small Business Administration programs, the First Step Business Line of Credit, and the California Capital Access Program. Three of these programs are highlighted below.

- The EOM program is available for borrowers meeting income limitations or residing in targeted census tracts. Underwriting standards for the program are flexible, allowing higher loan-to-value, higher debt ratios, and limited credit history. The 3,038 loans under this program totaled over \$304 million.
- The California Capital Access Program is a state program designed to encourage financial institutions to provide loans to small businesses that would not qualify under conventional underwriting guidelines. Loan proceeds have their primary economic benefit in California, and the state provides additional incentive for loans within state enterprise zones. The 74 loans under this program totaled over \$6 million for the evaluation period.
- Programs designed to assist small business development include the Small Business Administration's 7(a) and 504 programs. The 7(a) program assists businesses that cannot otherwise qualify for conventional financing at reasonable terms. During the evaluation period, UBOC originated 32 loans for \$11,396. Section 504 loans provide permanent real estate loans for owner-occupants, allowing up to 90% loan-to-value on the properties, which exceeds UBOC's standard underwriting guideline. UBOC originated 70 loans under this program for over \$47 million.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Bakersfield MSA, Fresno MSA, Sacramento MSA, and Salinas MSA is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in California.

In the remaining twelve AAs, the bank's performance is weaker than the bank's overall performance in the state. These AAs include Merced MSA, Modesto MSA, Redding MSA, Riverside-San Bernardino MSA, San Luis Obispo-Atascadero-Paso Robles MSA, Santa Barbara MSA, Stockton-Lodi MSA, Vallejo-Fairfield-Napa MSA, Visalia-Tulare-Porterville MSA, Yolo MSA, Yuba MSA, and the Non-MSA AAs. The reason for weaker performance includes the geographic distribution of loans and/or the distribution of

loans based on borrower income. Together, these AAs account for 16% of the total reportable loans in California, and therefore did not adversely affect the state rating.

Refer to the Tables 1 through 11 in the state of California section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in California is rated "Outstanding." Based on full-scope reviews, the bank's performance is excellent in the Los Angeles-Long Beach MSA, Oakland MSA, Orange County MSA, San Jose MSA and San Francisco MSA. Performance is adequate in the San Diego MSA.

Refer to Table 12 in the state of California section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

UBOC's investment emphasis is focused heavily on affordable housing, the most pressing need identified throughout its AAs. The large number of the bank's investments and associated dollars helped impact LMI persons significantly. In total, UBOC's investments helped provide nearly 7,000 such units of affordable housing. While these investments were generally not complex or innovative, UBOC created a major impact accommodation to its AAs.

The bank's overall investment dollar volume and responsiveness is high in all but one of its full-scope AAs. The following ratios exclude qualified investments UBOC made in the broader statewide, regional, or national areas, and any unfunded commitments, all of which enhance UBOC's performance. These ratios give a more direct profile of the dollars that are most responsive to each AA. In the Oakland and San Jose AAs, the volume of investments each exceeds 10% of the allocated Tier 1 Capital. In the Los Angeles, Orange County and San Francisco AAs, each respective percentage exceeds 4.1%. In the San Diego AA, the percentage is 1.6%.

In addition, supporting the bank's overall high dollar volume of investments is the bank's heavy involvement in grant activity that has directly benefited its AA. In Los Angeles alone, the bank has contributed close to \$4 million in CD activities meeting key needs of that area. Other key areas include the San Francisco MSA at \$2.6 million, and the San Diego MSA with \$1.6 million.

The bank's AAs possess a number and variety of CD investment opportunities and there are numerous financial institutions competing for these investments. UBOC displays an excellent responsiveness to CD and credit needs, particularly the need for affordable housing, as previously mentioned. Below are highlights of some of these investments.

In July 1999, UBOC provided an equity investment of \$47 million in a limited partnership. The purpose of the partnership is to invest in entities that finance, acquire, develop, rehabilitate, manage, and sell or rent housing primarily for LMI individuals.

UBOC also has a \$33 million equity investment in a limited partnership fund, which focuses on entities that own and operate affordable, multifamily apartment complexes. LMI persons and families occupy these rental housing projects. The general partner, a nonprofit corporation with extensive experience in developing affordable housing will monitor the project. Federal low-income housing tax credits are used in these projects.

UBOC has another equity investment for \$30 million in a significant limited partnership fund. The purpose of the partnership is to invest in entities that finance, acquire, develop, rehabilitate, manage, and sell or rent housing primarily for LMI individuals.

In the Oakland AA, UBOC has a \$7.2 million tax credit related limited partnership investment in a 60-unit affordable housing complex in Fremont, California. The project is both rent and income restricted.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Lending Test in the Bakersfield MSA, Riverside-San Bernardino MSA, Sacramento MSA, Salinas MSA, San Luis Obispo-Atascadero-Paso Robles MSA, Vallejo-Fairfield-Napa MSA, Yolo MSA, and the Non-MSA AAs are not inconsistent with the bank's overall "Outstanding" performance under the Investment Test in California.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Fresno MSA, Merced MSA, Modesto MSA, Redding MSA, Santa Barbara-Santa Maria-Lompoc MSA, Stockton-Lodi MSA, and the Visalia-Tulare-Porterville MSA is weaker than the bank's overall performance. This weaker performance is due to the lower level of investment activity in relation to the respective presence of the bank in these AAs. Together, these AAs account for a very small portion of the total reportable investments in California, and therefore did not adversely affect the overall state rating. Refer to the Table 12 in the state of California section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated "High Satisfactory." Based on the full-scope review, the bank's performance is excellent in the San Diego MSA and Oakland MSA, good in the San Francisco MSA and the San Jose MSA, and adequate in the Los Angeles-Long Beach MSA and the Orange County MSA.

### **Retail Banking Services**

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

UBOC provides banking services, which are accessible to essentially all portions of the bank's AA. UBOC's delivery systems have excellent accessibility in the San Diego MSA and Oakland MSA, good accessibility to geographies and individuals of different income levels in the San Francisco and San Jose MSAs, adequate accessibility in the Orange County MSA, and poor accessibility in the Los Angeles-Long Beach MSA.

In the Oakland MSA, the distribution of UBOC offices in moderate-income geographies significantly exceeds the distribution of the population living there. In addition, the distribution in low-income geographies exceeds the distribution of population living there.

In the San Francisco MSA, the distribution of UBOC offices in low-income geographies significantly exceeds the population distribution living there. And the distribution of UBOC offices in moderate-income geographies is only slightly lower than moderate-income demographics. In the San Diego MSA and the San Jose MSA, the distribution of UBOC offices in moderate-income geographies significantly exceeds the population demographics. In the San Diego MSA, the distribution of UBOC offices in low-income geographies is only slightly lower than moderate-income demographics. Although none of the bank's branches in the San Jose MSA are in low-income geographies, only 3.9 percent of the population resides in these geographies.

In the Orange County MSA, the distribution of UBOC offices in low-income geographies is only slightly lower than low-income demographics and is somewhat lower in moderate-income geographies. In the Los Angeles-Long Beach MSA, only 2.5% of UBOC offices are in low-income geographies, although 9.02% of the population resides in these demographics. And only 5.0% of UBOC offices are in moderate-income geographies, although 26.69% of the population resides in these demographics.

Branch openings and closures have not adversely affected the accessibility of delivery systems in any AA. Although UBOC closed one branch in a moderate-income geography in the San Jose MSA, this location was at the San Jose Airport and had no regular customers. There were no closures in low-income geographies in any AA. The two branch openings in the San Diego MSA, one in a low-income geography and one in a moderate-income geography, enhanced the bank's already strong distribution.

In the Los Angeles-Long Beach MSA, the distribution of the bank's forty-seven ATMs is slightly below the distribution of the low-income population and well below the distribution of the moderate-income population. In the San Francisco MSA, the distribution of the thirteen ATMs of the bank significantly exceeds the distribution of the low-income population living there and is only slightly below the distribution of the moderate-income population. In the San Diego MSA, the distribution of the seventy ATMs of the bank exceeds the low-income population living there and is just slightly below the distribution of the moderate-income population. In the Orange County MSA, the distribution of the forty-one ATMs of the bank is just slightly below the distribution

both LMI population residing living there. In the San Jose MSA, the distribution of the ten ATMs of the bank is just slightly below the distribution of the low-income population and significantly exceeds the distribution of the moderate-income population. In the Oakland MSA, the distribution of the bank's thirteen ATMs significantly exceeds the distribution of the low-income population living there and exceeds the distribution of the moderate-income population.

UBOC's hours and services offered are adequate. Hours and services in all Instore and "Cash and Save" locations are comparable among all locations regardless of the income level of the geography. Branch hours and services in traditional branches are generally comparable, however in all the full-scope AAs; some of the branch locations in LMI geographies do not offer Saturday banking hours. However, all these branches are in downtown business areas that get significantly less business on weekends. UBOC's traditional branch hours are reasonable (typically, 9:00 to 4:00 or 5:00 PM Monday - Thursday, till 6:00 PM on Friday and 9:00 to 1:00 or 2:00 pm on Saturday). Instore branches provide longer hours and seven day a week banking opportunities.

UBOC offers a wide range of alternative delivery systems, including telephone banking and ATMs. Since the bank could not provide specific information on how low- and moderate-income individuals and geographies are impacted by the services, significant weight was not placed on alternative delivery systems when drawing conclusions for each full-scope area under the Service Test. However, the bank's "Cash and Save" program is particularly noteworthy in targeting low- and moderate-income customers and introducing many of them to banking for the first time. UBOC initiated the "Cash and Save" program in 1993 and it now operates from thirteen sites in California. Three of these operate as independent full service branches. In general, "Cash and Save" offices provide check cashing, savings, low cost checking, money order, wire, and other services to individuals who don't typically use traditional banking services. "Cash and Save" services are targeted to low- and moderate-income individuals and geographies, with seven of thirteen offices located in LMI census tracts. The program has been successful at establishing checking/savings accounts, for new UBOC customers. Over the past three years, about one third of the "Cash and Save" customers have gone on to use at least one other of UBOC's products or services. UBOC also offers a \$1 minimum balance checking account in all AAs that allow customers, including those who are LMI, to maintain accounts with only a \$3 service fee.

### **Community Development Services**

The bank demonstrates good performance in providing community development services. UBOC's performance in providing CD services in the San Diego MSA is excellent, good in the Los Angeles-Long Beach MSA and the Oakland MSA, and adequate in the San Francisco MSA, the Orange County MSA, and the San Jose MSA.

In the San Diego MSA, UBOC is involved in twenty-one economic development, eight affordable housing, and twenty-six different community service organizations. It has also provided technical assistance and presented its products and services at twenty-three organization targeted toward LMI individuals. UBOC's involvement is primarily centered



in board member participation on fifty-four organizations, helping with strategic planning at seven organizations, providing credit management at four organizations, and assisting in fund raising.

In the Los Angeles-Long Beach MSA, UBOC is involved in five economic development, three affordable housing, and twenty-eight community service organizations. It has also provided technical assistance and presented its products and services at twenty-four organization targeted toward LMI individuals. UBOC's involvement is primarily centered in board member participation on thirty-three organizations, helping with strategic planning at six organizations, providing credit management at two organizations, and assisting in fund raising.

In the Oakland MSA, UBOC has dedicated a significant amount of hours to helping four affordable housing organizations, which is an identified credit need in the AA. It is also involved with ten different community service organizations. UBOC's involvement is primarily centered in board member participation in nine of these organizations, providing credit management at three organizations, and helping with strategic planning at two organizations.

In the San Francisco MSA, UBOC is involved with six affordable housing organizations, which is a significant credit need in the AA. It also is involved with one economic development and six different community service organizations. It has also provided technical assistance and presented its products and services at two organization targeted toward LMI individuals. UBOC's involvement is primarily centered in board member participation in ten organizations, helping with strategic planning in one organization, sitting on the loan committee of one organization, and assisting in fund raising.

In the Orange County MSA, UBOC is involved with three economic development, one affordable housing organization, and seven different community service organizations. It has also provided technical assistance and presented its products and services at eight organization targeted toward LMI individuals. UBOC's involvement is primarily centered in board member participation in eleven organizations, helping with strategic planning in four organizations, and assisting in fund raising.

In the San Jose MSA, UBOC is involved with one affordable housing organization, and six different community service organizations. It has also provided technical assistance and presented its products and services at three organization targeted toward LMI individuals. UBOC's involvement is primarily centered in board member participation in six organizations, and assisting in fund raising.

### **Conclusions for Areas receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Service Test in the Riverside-San Bernardino MSA, the Bakersfield MSA, Modesto MSA, the Redding MSA, the Santa Barbara-Santa Maria-Lompoc MSA, and the Visalia-Tulare-Porterville MSA is not inconsistent with the bank's overall performance. The performance in the

Fresno MSA, the Merced MSA, the Sacramento MSA, the Salinas MSA, the San Luis Obispo-Atascadero-Paso Robles MSA, the Stockton-Lodi MSA, the Vallejo-Fairfield-Napa, the Yolo MSA, the Yuba City MSA, and the Non-MSA AAs is weaker than the bank's overall performance. This weaker performance did not have a material impact on the bank's overall Service Test rating.

In the Stockton-Lodi MSA, the distribution of UBOC offices in low-income geographies significantly exceeds the distribution of low-income families living there. Although there are no branches in any of the other low-income geographies, the distribution of low-income families is very low all these areas. The Sacramento MSA has the highest distribution of low-income families representing 5.14% of the area.

In the Visalia-Tulare-Porterville MSA and the Modesto MSA, the distribution of UBOC offices in moderate-income geographies significantly exceeds the distribution of moderate-income families living there. In the Santa Barbara-Santa Maria-Lompoc MSA, the distribution of UBOC offices in moderate-income geographies exceeds the distribution of moderate-income families living there. In the Bakersfield MSA and the Sacramento MSA, the distribution of UBOC offices in moderate-income geographies is slightly lower than the distribution of moderate-income families living there. In the Fresno MSA and the Non-MSA AA, the distribution of UBOC offices in moderate-income geographies is somewhat lower than the distribution of moderate-income families living there. In the Stockton-Lodi MSA, the distribution of UBOC offices in moderate-income geographies is significantly lower than the distribution of moderate-income families living there. In the other assessment areas, there were not enough branches to make any type of meaningful analysis. Refer to Table 13 in Appendix C for the facts and data that support these conclusions.

## State Rating

**CRA Rating for Washington:** Satisfactory  
**The Lending Test is rated:** Low Satisfactory  
**The Investment Test is rated:** Low Satisfactory  
**The Service Test is rated:** Low Satisfactory

- Lending activity in Washington is excellent. However, the geographic distribution of loans and the distribution by borrower income are just adequate. Community development loans had a positive effect on lending performance.
- The volume and responsiveness of the qualified investments is adequate.
- Despite the bank's limited presence, it provides banking services that are reasonably accessible to all portions to geographies and individuals of different income level. It has also provided some CD services.

### Description of Institution's Operations in Washington

UBOC is forty-fifth in deposit size for institutions in Washington, with 0.28% of the state's deposit base (FDIC-June 2000). The largest four institutions include Bank of America, N.A. (22%), Washington Mutual Bank (16%), U.S. Bank N.A. (12%) and Keybank N.A. (8%). UBOC operates four branches in three AAs within the state. Approximately 0.7% of UBOC's total deposits and 1.2% of reportable loans are in Washington.

Refer to the Market Profiles for the state of Washington in Appendix C for detailed demographics and other contextual information for the full-scope AAs.

### Scope of the Evaluation in Washington

We performed a full-scope review of the Seattle-Bellevue-Everett MSA. This AA provides over 70% of UBOC's deposits in the state of Washington, and UBOC has made 75% of the state's reportable loans in this area. In evaluating the bank's lending performance all weight was placed on small loans to businesses compared to home mortgage lending and small loans to farms. This is based on the percentage of small loans to businesses (76%), market competition, and community credit needs. Just 2% of the reportable loans are small loans to farms. The limited volume of home mortgage loan originations (113) in all AAs is not material and precludes a meaningful analysis under both of the distribution tests.

Please refer to the community profiles in Appendix B for discussion of community contacts made in the full-scope AA.

## LENDING TEST

## **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Lending Test in Washington is rated "Low Satisfactory." Based on the full-scope review, the bank's performance in the Seattle-Bellevue-Everett MSA is adequate.

### **Lending Activity**

Refer to Table 1 in the state of Washington section of Appendix D for the facts and data used to evaluate the bank's lending activity.

In the Seattle-Bellevue-Everett MSA, the bank's 443 reportable loans originated/purchased during the evaluation period were comprised of 76% small loans to businesses and 22% home mortgage. Community development loans had a positive impact on our analysis, accounting for 0.9% of the total dollar volume of reportable loans.

UBOC's lending activity in the Seattle-Bellevue-Everett MSA is excellent. The bank's deposit rank is thirty-first with a deposit market share of 0.34%. UBOC's small loans to businesses are ranked twentieth with a market share of 0.41% by number of loans.

### **Distribution of Loans by Income Level of the Geography**

The bank's overall geographic distribution in the full-scope AA is adequate.

#### ***Small Loans to Businesses***

Refer to Table 5 in the state of Washington section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good in the Seattle-Bellevue-Everett MSA. In the low-income geographies, the percentage of loans exceeds the percentage of businesses in the geographies, and the bank's market share exceeds their overall market share. The percentage distribution of loans in the moderate-income geographies is below the percent of businesses in the respective geographies, and the market share is below the overall market share.

### ***Home Mortgage Loans***

Refer to Tables 2, 3 and 4 in the state of Washington section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Mortgage loan volume is not significant enough to allow for meaningful analysis.

### ***Lending Gap Analysis***

The analysis of the overall lending activity in the full-scope area did not reveal any conspicuous gaps in the geographic distribution of loans that warrant concern.

### ***Inside/Outside Ratio***

This analysis was performed at the bank level rather than by state. Please refer to the comment in the California portion of this document.

### ***Distribution of Loans by Income Level of the Borrower***

The bank's distribution of loans by the income level of the borrower in the full-scope AAs is adequate.

### ***Small Loans to Businesses***

Refer to Table 10 in the state of Washington section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses in the Seattle-Bellevue-Everett MSA is adequate. In the full-scope AA, the percentage of loans made to small businesses (businesses with annual revenues of \$1 million or less) is below the percentage of businesses defined as such. However, the bank's market share of such loans substantially meets the bank's overall market share.

### ***Home Mortgage Loans***

Refer to Tables 7, 8 and 9 in the state of Washington section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases. Mortgage loan volume is not significant enough to allow for meaningful analysis.

## **Community Development Lending**

Refer to Table 1 in the state of Washington section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

CD lending in Washington had a positive impact upon the bank's performance in the Seattle-Bellevue-Everett MSA. UBOC's CD loan activity was comprised of two loans originated in the Seattle-Bellevue-Everett MSA, which were for affordable housing. These loans total \$1.1 million and approximate 3.5% of the bank's allocated Tier 1 Capital.

## **Product Innovation and Flexibility**

UBOC's loan product innovation and flexibility had a positive impact on the Lending Test conclusion. Please refer to the comment in the California section of this evaluation for the specific loan programs offered.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Tacoma MSA and Chelan County AA is not inconsistent with the bank's overall adequate performance under the Lending Test in Washington. Refer to the Tables 1 through 11 in the state of Washington section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in Washington is rated "Low Satisfactory."

Refer to Table 12 in the state of Washington section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The volume and responsiveness of UBOC's investments is adequate. UBOC provided eight donations totaling \$77 thousand for various CD benefits to the Seattle-Bellevue-Everett MSA. The bank's AAs possess various CD investment opportunities, however there are numerous financial institutions competing for these investments. While UBOC has not been particularly active in this area, UBOC only has a modest presence in the state.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Tacoma MSA is not inconsistent with the bank's overall adequate performance under

the Investment Test in Washington. The bank's performance in the Chelan County MSA is weaker than the bank's overall performance. This weaker performance is due to the lack of any investment activity. However, this weaker performance did not result in any changes to the overall conclusion regarding UBOC's Investment Test performance. Refer to the Table 12 in the state of Washington of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated "Low Satisfactory." Based on the full-scope review, the bank's performance is adequate in the Seattle-Bellevue-Everett MSA.

#### **Retail Banking Services**

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

UBOC's delivery systems have reasonable accessibility in this MSA to individuals and geographies of different income levels. There are only two branches and three ATMs in this large AA. Thus, it is difficult to ascribe any statistical significance to the percentage distribution of these branches. We therefore placed less weight on this factor. One of the two branches and one of the three ATMs is in a moderate-income census tract.

There have been no branch openings or closures during the evaluation period.

UBOC's hours and services offered are adequate.

UBOC offers a wide range of alternative delivery systems, including telephone banking and ATMs. Since the bank could not provide specific information on how LMI individuals and geographies are impacted by the services, significant weight was not placed on alternative delivery systems when drawing a conclusion under the Service Test.

UBOC also offers a \$1 minimum balance checking account in all AAs that allow customers, including those who are LMI, to maintain accounts with only a \$3 service fee.

#### **Community Development Services**

UBOC's performance in providing CD services in the Seattle-Bellevue-Everett MSA is adequate. UBOC is involved in one economic development and three different community service organizations. UBOC's has had two officers serve on the boards of the economic development organization. For the community service organizations, UBOC has also had one employee who served on the board, another employee helped

with the accounting for a fundraiser, and one employee who presented banking products to a low-and moderate-income organization. All the employees represented have also assisted in fundraising.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

UBOC has only one branch in the Chelan County AA and one branch in the Tacoma MSA which precludes meaningful analysis based on the distribution of the bank's branches. Performance in these areas is weaker than the bank's overall performance due to a lower level of CD services. However, this weaker performance did not result in any changes to the overall conclusion regarding UBOC's Service Test performance.



## State Rating

**CRA Rating for Oregon:** Satisfactory  
**The Lending Test is rated:** High Satisfactory  
**The Investment Test is rated:** Low Satisfactory  
**The Service Test is rated:** High Satisfactory

- The lending activity within the Portland-Vancouver MSA is good. The geographic distribution of loans is also good, but the distribution by borrower income is poor. Community development loans had a positive affect on the bank's overall lending rating.
- The bank's level of qualified investments adequately responds to the AA needs.
- The bank has provided of variety of targeted CD services within its AA.

### Description of Institution's Operations in Oregon

UBOC is the thirtieth in deposit size for institutions in Oregon, with 0.5% of the state's deposit base (FDIC-June 2000). The four largest institutions include U.S. Bank N.A. (27%), Washington Mutual Bank (13%), Bank of America, N.A. (11%), and Wells Fargo Bank, N.A. (10%). UBOC operates two branches in two AAs within the state. Approximately 0.6% of UBOC's total deposits and 1.3% of reportable loans are in Oregon.

Refer to the Market Profiles for the state of Oregon in Appendix C for detailed demographics and other contextual information for the full-scope AAs.

### Scope of the Evaluation in Oregon

We performed a full-scope review of the Portland-Vancouver MSA. This AA provides 86% of UBOC's deposits in the state of Oregon, and UBOC has made 83% of Oregon's reportable loans in this area. In evaluating the bank's lending performance, most of the weight was placed on small loans to businesses compared to home mortgage lending and small loans to farms. This is based on the percentage of small loans to businesses (78%), market competition, and community credit needs. Small loans to farms were less than 1% of the reportable loans, and receive no weight in this analysis. The limited number of home mortgage loans (20%) is comprised of refinance loans (52%) and home purchase loans (46%). The limited volume of home mortgage loans (103) covering all AAs is not material and precludes a meaningful analysis under both of the distribution tests.

Please refer to the community profiles in Appendix B for discussion of community contacts made in the full-scope AA.

## LENDING TEST

## **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Lending Test in Oregon is rated "High Satisfactory." Based on the full-scope review, the bank's performance in the Portland-Vancouver MSA is good.

### **Lending Activity**

Refer to Table 1 in the state of Oregon section of Appendix D for the facts and data used to evaluate the bank's lending activity.

UBOC's lending activity in the Portland-Vancouver MSA is good. The bank ranks fifteenth with a deposit market share of 0.77%. UBOC's small loans to businesses ranks eighteenth with a market share of 0.61% by number of loans and 2.92% by dollar volume. Because approximately 39% of the reported loans in this market are business credit card products averaging \$6 thousand, a comparison of market share based on dollars is appropriate. Total home mortgage volume is low with just 29 home mortgage loans for an aggregate rank of two hundred twenty-eighth and market share of 0.02%.

### **Distribution of Loans by Income Level of the Geography**

The overall geographic distribution of loans in the full-scope AA is good.

#### ***Small Loans to Businesses***

Refer to Table 5 in the state of Oregon section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses in the Portland-Vancouver MSA is excellent. In both the LMI geographies, the percentage of bank loans exceeds the percentage of businesses in the geographies. The bank's market share in the LMI geographies also exceeds their overall market share.

### ***Home Mortgage Loans***

Refer to Tables 2, 3 and 4 in the state of Oregon section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Mortgage loan volume is not significant enough to allow for meaningful analysis.

### ***Lending Gap Analysis***

The analysis of the overall lending activity in the full-scope area did not reveal any conspicuous gaps in the geographic distribution of loans that warrant concern.

### ***Inside/Outside Ratio***

This analysis was performed at the bank level rather than by state. Please refer to the comment in the California portion of this document.

### **Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution of reportable loans in the full-scope AA is poor.

### ***Small Loans to Businesses***

Refer to Table 10 in the state of Oregon section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses in the Portland-Vancouver MSA is poor. In the full-scope AA, the percentage of loans made to small businesses (businesses with annual revenues of \$1 million or less) is below the percentage of businesses defined as such. In addition, the bank's market share of such loans is below its overall market share.

### ***Home Mortgage Loans***

Refer to Tables 7, 8 and 9 in the state of Oregon section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Mortgage loan origination volume is not significant enough to allow for meaningful analysis.

### **Community Development Lending**

Refer to Table 1 in the state of Oregon section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

CD lending in Oregon had a positive impact upon the bank's performance in the full-scope AA.

UBOC's level and nature of CD lending activity has been responsive to the community. The bank provided 14 loans for a variety of CD purposes to benefit the full-scope AA. The combined activity totaled \$3.3 million and represented 11% of the bank's allocated Tier 1 Capital position.

### **Product Innovation and Flexibility**

UBOC's loan product innovation and flexibility had a positive impact on the Lending Test conclusion. Please refer to the comment in the California section of this evaluation for the specific loan programs offered.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Eugene-Springfield MSA is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Oregon.

Refer to the Tables 1 through 11 in the state of Oregon section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in Oregon is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance is adequate in the Portland-Vancouver MSA.

Refer to Table 12 in the state of Oregon section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

The volume of UBOC's investments and their responsiveness to community needs is adequate. UBOC's investments include \$17 thousand to entities supporting affordable housing, and \$70 thousand in other qualified donations. The remaining investment dollars went to a statewide organization that also benefited its AAs. UBOC also has some \$3.6 million in unfunded commitments directed toward affordable housing initiatives.

The full-scope AA possesses a number and variety of CD investment opportunities, and there are numerous financial institutions competing for these investments.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Eugene-Springfield MSA is weaker than the bank's overall performance. This weaker performance is due to the lower level of investment activity. However, the weaker performance did not result in any change to the bank's overall Investment Test for Oregon. Refer to the Table 12 in the state of Oregon section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated "High Satisfactory." Based on the full-scope review, the bank's performance is good in the Portland-Vancouver MSA.

#### **Retail Banking Services**

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

UBOC's delivery systems have reasonable accessibility in the Portland-Vancouver MSA to individuals of different income levels. There is only one branch and one ATM in this very large AA. Thus, it is difficult to ascribe any statistical significance to the percentage distribution of these branches. We therefore placed less weight on this factor. Both the branch and the ATM are in a moderate-income census tract.

There have been no branch openings or closures during the evaluation period.

UBOC's hours and services offered are adequate.

UBOC offers a wide range of alternative delivery systems, including telephone banking and ATMs. Since the bank could not provide specific information on how LMI individuals and geographies are impacted by the services, significant weight was not placed on alternative delivery systems when drawing a conclusion under the Service Test.

UBOC also offers a \$1 minimum balance checking account in all AAs that allow customers, including those who are low- and moderate-income, to maintain accounts with only a \$3 service fee.

#### **Community Development Services**

UBOC's performance in providing CD services in the Portland-Vancouver MSA is good.

UBOC is involved in four affordable housing, and eleven different community service organizations. UBOC's involvement is primarily centered in board member participation on twelve organizations, helping with strategic planning at three organizations, providing credit management at one organization, and assisting in fund raising.

### **Conclusions for Area Receiving Limited-Scope Review**

Based on limited scope review, the bank's performance under the Service Test in the Eugene-Springfield MSA is not inconsistent with the bank's overall performance. In the Eugene-Springfield MSA, there is only one branch and it is located in a moderate-income census tract.

## Territory Rating

**CRA Rating for Guam:** Satisfactory  
**The Lending Test is rated:** Low Satisfactory  
**The Investment Test is rated:** Low Satisfactory  
**The Service Test is rated:** Low Satisfactory

- Lending activity in Guam is adequate relative to the bank’s market share of deposits. The geographic distribution of loans is excellent, and distribution by borrower income is poor.
- UBOC made no qualified investments on Guam during the evaluation period. However, there are very few investment opportunities available.
- The bank’s branch locations, coupled with several community development services adequately support the bank’s AA.

### Description of Institution’s Operations in Guam

UBOC is the fifth largest deposit-taking financial institution in Guam, with over 7% of the Territory’s deposit base (FDIC-June 1999). Other large institutions include Citibank, N.A. (28%), Bank of Guam (23%), Bank of Hawaii (17%), and First Hawaiian Bank (11%). UBOC operates one branch in their one AA on Guam. Approximately 0.45% of UBOC’s deposits and 0.24% of reportable loans are in Guam.

Refer to the Market Profiles for United States Territory of Guam in Appendix C for detailed demographics and other contextual information for the full-scope AA.

### Scope of the Evaluation in Guam

We performed full-scope reviews of the bank’s only AA on Guam. Because the bank is not required to report home mortgage loans in the Territory, coupled with its minimal activity, our analysis focused solely on small loans to businesses. There are no reported small loans to farms.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank’s performance under the Lending Test in Guam is rated “Low Satisfactory.” Based on full-scope review, the bank’s performance in the Guam AA is adequate.

### Lending Activity

Refer to Table 1 in the United States Territory of Guam section of Appendix D for the facts and data used to evaluate the bank’s lending activity.

In the Guam AA, the total volume of small loans to businesses for the evaluation period was 113 loans. UBOC's lending activity is adequate. The bank ranks fifth in deposit share (7.2%) and fifth (5.5%) in small loans to businesses.

### **Distribution of Loans by Income Level of the Geography**

Refer to Table 5 in the United States Territory of Guam section of Appendix D the Market Profile for Guam in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. In the absence of demographic information on small businesses in the Territory, we compared the distribution of loans to the population in each geography. There are no low-income geographies. In the moderate-income geographies, the distribution of small loans to businesses (49.6%) exceeds the percentage of the population residing in the geographies (16.4%). Market share data by geography is not available for comparison to the bank's overall market share.

### ***Lending Gap Analysis***

The analysis of the bank's overall lending activity did not reveal any unexplained, conspicuous gaps in the geographic distribution of loans.

### ***Inside/Outside Ratio***

This analysis was performed at the bank level rather than by state. Please refer to the comment the California portion of this document.

### **Distribution of Loans by Income Level of the Borrower**

#### ***Small Loans to Businesses***

Refer to Table 10 in the United States Territory of Guam section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is poor. In the absence of demographic data on the size of businesses in the Territory, this conclusion is based solely on relative market share. UBOC's market share of loans made to small businesses (businesses with annual revenues of \$1 million or less) is below their overall market share.

### **Community Development Lending**

Refer to Table 1 in the United States Territory of Guam section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.



CD lending in Guam had a neutral impact upon the bank's performance. There were no CD loans made in the Territory. The lack of activity is reflective of the bank's nominal presence in this AA. In addition, there are limited opportunities in the AA.

### **Product Innovation and Flexibility**

The bank does not offer products with flexible or innovative characteristics in the Territory of Guam.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test for Guam is rated "Satisfactory". There were no investments made in this Territory. The lack of activity is reflective of the bank's nominal presence in this AA. While there is not a lot of available information on investment opportunities, information gathered from other CRA Performance Evaluations reflect that some, but not many opportunities exist.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated "Low Satisfactory."

### **Retail Banking Services**

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

UBOC's delivery systems have reasonable accessibility in Guam to individuals of different income levels. The bank has two offices and one ATM in the AA. The offices are split between a moderate-income and a middle-income geography.

There have been no branch openings or closures during the evaluation period.

UBOC's hours and services offered are adequate.

UBOC offers a wide range of alternative delivery systems, including telephone banking and ATMs. Since the bank could not provide specific information on how LMI individuals and geographies are impacted by the services, significant weight was not placed on alternative delivery systems when drawing a conclusion under the Service Test.

UBOC also offers a \$1 minimum balance checking account in all AAs that allow customers, including those who are low- and moderate-income, to maintain accounts with only a \$3 service fee.

### **Community Development Services**

UBOC's performance in providing CD services in the Guam AA is adequate. It provided two community development services in this AA.

## Commonwealth Rating

**CRA Rating for Saipan:** Satisfactory  
**The Lending Test is rated:** Low Satisfactory  
**The Investment Test is rated:** Low Satisfactory  
**The Service Test is rated:** Low Satisfactory

- Lending activity in Saipan is adequate relative to the bank's market share of deposits. The geographic distribution of loans is adequate, and distribution by borrower income is good.
- UBOC made no qualified investments in Saipan during the evaluation period. However, there are very few opportunities and the bank has a small presence.
- The bank's branch location, coupled with several community development services adequately supports the bank's AA.

## Description of Institution's Operations in Saipan

UBOC is the third largest deposit-taking financial institution in Saipan, with over 22% of the Commonwealth's deposit base (FDIC-June 1999). Other large institutions include Bank of Guam (37%) and Bank of Hawaii (32%). UBOC operates one branch in their one AA on Saipan. Approximately 0.44% of UBOC's deposits and 0.09% of reportable loans are in Saipan.

Refer to the Market Profiles for United States Territory of Saipan in Appendix C for detailed demographics and other contextual information for the full-scope AAs.

## Scope of the Evaluation in Saipan

We performed a full-scope review of the bank's Saipan AA, its only AA within the Commonwealth of the Northern Mariana Islands. Because the bank is not required to report home mortgage loans in the Territory, coupled with its minimal activity, our analysis focused solely on small loans to businesses. There were no reported small loans to farms.

Please refer to the community profile in Appendix B for discussion of community contacts made in the AA.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Saipan is rated "Low Satisfactory." Based on full-scope review, the bank's performance in the Saipan AA is adequate.

## Lending Activity

Refer to Table 1 in the United States Territory of Saipan section of Appendix D for the facts and data used to evaluate the bank's lending activity.

In the Saipan AA, the total volume of small loans to businesses for the evaluation period was 45 loans. UBOC's lending activity is adequate. The bank ranks third in deposit share (22.0%) and third (11.2%) in small loans to businesses.

## **Distribution of Loans by Income Level of the Geography**

### ***Small Loans to Businesses***

Refer to Table 5 in the Saipan AA section of Appendix D and the Market Profile for Saipan in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. In the absence of demographic information on small businesses in the Territory, we compared the distribution of loans to the population in each geography. There is just one low-income geography, and the bank made no loans there. In the moderate-income geographies, the distribution of small loans to businesses (2.22%) is below the percentage of the population residing in the geographies (4.08%). Market share data by geography is not available for comparison to the bank's overall market share.

### ***Lending Gap Analysis***

The analysis of the bank's overall lending activity did not reveal any unexplained, conspicuous gaps in the geographic distribution of loans.

### ***Inside/Outside Ratio***

This analysis was performed at the bank level rather than by state. Please refer to the comment the California portion of this document.

## **Distribution of Loans by Income Level of the Borrower**

### ***Small Loans to Businesses***

Refer to Table 10 in the United States Territory of Saipan section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good. In the absence of demographic data on the size of businesses in the Territory, this conclusion is based solely on relative market share. UBOC's market share of loans made to small businesses (businesses with annual revenues of \$1 million or less) substantially meets their overall market share.

## **Community Development Lending**

Refer to Table 1 in the United States Territory of Saipan section of Appendix D for the facts and data used to evaluate the bank's level of community development lending.

CD lending in Saipan had a neutral impact upon the bank's performance. There were no CD loans made in this U.S. territory. The lack of activity is reflective of the bank's nominal presence in this AA coupled with the lack of opportunities.

## **Product Innovation and Flexibility**

The bank does not offer flexible or innovative products in the Territory of Saipan.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test for Saipan is "Low Satisfactory". There were no investments made in this AA. The lack of activity is reflective of the bank's nominal presence in Saipan. In addition, the absence of available information on the level of opportunities in this AA precludes a meaningful conclusion and thus defaults to adequate performance.

## **SERVICE TEST**

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

UBOC's delivery systems have reasonable accessibility in the Saipan AA to individuals of different income levels. Both the branch and the ATM are in a middle-income geography.

There have been no branch openings or closures during the evaluation period.

UBOC's hours and services offered are adequate.

UBOC offers a wide range of alternative delivery systems, including telephone banking and ATMs. Since the bank could not provide specific information on how low- and moderate-income individuals and geographies are impacted by the services, significant weight was not placed on alternative delivery systems when drawing a conclusion under the Service Test.

UBOC also offers a \$1 minimum balance checking account in all AAs that allow customers, including those who are low- and moderate-income, to maintain accounts with only a \$3 service fee.

## **Community Development Services**

UBOC's performance in providing CD services in the Saipan AA is adequate. Its performance includes two community development services in this AA.



Seattle-Bellevue-Everett MSA Chelan County AA Tacoma MSA	Limited-scope Limited-scope	
Oregon Portland-Vancouver MSA Eugene-Springfield MSA	Full-scope Limited-scope	
Guam	Full-scope	
Northern Marina Islands Saipan	Full-scope	



## Appendix B: Summary of State Ratings

RATINGS		BANK NAME Union Bank of California		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Union Bank of California	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State/Territory:				
California	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Washington	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Oregon	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Territory of Guam	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Commonwealth of the Northern Mariana Islands	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Test in the overall rating.

## Appendix C: Market Profiles for Full-Scope Areas

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### Table of Contents

#### Market Profiles for Areas Receiving Full-Scope Reviews

State of California .....	C-2
State of Washington .....	C-14
State of Oregon .....	C-16
Territory of Guam .....	C-18
Commonwealth of the Northern Mariana Islands .....	C-20

## State of California Full-Scope Areas

### Los Angeles-Long Beach MSA

Demographic Information for Full-Scope Area: Los Angeles-Long Beach MSA						
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
Businesses by Geography	344,027	8.95	18.85	33.49	38.39	0.33
Farms by Geography	3,108	2.54	11.55	37.16	48.55	0.19
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		=		
HUD Adjusted Median Family Income for 2000	= \$52,100	Unemployment Rate March 2001(Bureau of Labor Statistics - BLS)		=		\$223,825
Households Below the Poverty Level	= 11.87%			=		4.7%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

UBOC's AA covers the entire Los Angeles-Long Beach MSA, #4480, which 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. Nearly one third of the total population of the state of California reside in this MSA, with an estimated population excess of 9 million as of January 2000. Not only is it the largest MSA in the California, but also the largest in the Country.

The bank has a major presence here with a total of 43 freestanding, instore, and "Cash and Save" branches. In addition, UBOC has 60 ATMs. As of June 30, 1999, it reported some \$7.6 billion in deposits. This represents 42% of the total California deposits of the bank, a deposit market share of 6.6% and a market rank of five. Loans made in this MSA represent 6% of all California lending. The bank has a market rank of nine for small business lending but is not considered a significant player in the residential mortgage market. Major competitors include, Bank of America NT & SA, Washington Mutual Bank, FA, Wells Fargo Bank, and California Federal Bank. The first two competitors have major deposit markets shares of 19% and 14% respectively. This information was obtained from the June 30, 1999 FDIC Deposit Market Share Reports. This same source is used for all deposit market analyses and data

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 further aggravated the business and community problems. Despite Federal and State assistance, many of the businesses destroyed during the disturbances have not reopened. Consequently, jobs were lost. This created further economic dislocations. The MSA's economy has now rebounded, and the unemployment rate has continued to decline. The Bureau of Labor and Statistics reported a 4.9 percent unemployment rate for March 2001.

The Los Angeles MSA's largest industries in order of importance are services, retail trade, wholesale trade, finance and real estate, manufacturing and construction. In response to concessions from other states, the motion picture industry has moved a great deal of its production activity out of Los Angeles. However, there are many business opportunities within the MSA. According to recent Dun & Bradstreet statistics, 75 percent of businesses and farms located within the MSA have annual revenues of less than \$1 million.

Individuals in the community knowledgeable about community credit needs identified the area's major credit needs as affordable housing and small business lending. Housing affordability problems are an outgrowth of the large low-wage workforce of the region. Both housing costs and rents have continued to outpace wage growth. While community development opportunities are available through many different avenues, competition for these activities is extremely high.

## Oakland MSA

Demographic Information for Full-Scope Area: Oakland MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	482	11.00	20.12	38.59	24.69	5.60
Population by Geography	2,082,914	8.58	20.10	43.13	27.70	0.49
Owner-Occupied Housing by Geography	458,352	3.78	13.15	46.62	36.44	0.00
Businesses by Geography	87,853	11.55	15.58	44.42	27.94	0.51
Farms by Geography	1,444	5.26	11.36	45.22	38.02	0.14
Family Distribution by Income Level	526,565	20.34	17.35	23.48	38.83	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	198,442	15.96	29.49	41.59	12.96	0.00
Median Family Income		Median Housing Value		=		
HUD Adjusted Median Family Income for 2000	= \$47,516	Unemployment Rate March 2001(BLS)		= \$222,414		
Households Below the Poverty Level	= \$67,600			=		
	=			2.8%		
	8.23%					

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

UBOC's AA covers the entire Oakland MSA, #5775 or all of Alameda and Contra Costa Counties. This is generally the greater Oakland area and includes other major cities such as Fremont, Hayward, San Leandro, Alameda, Berkeley, Richmond, El Cerrito, Concord, Walnut Creek, and Livermore.

The bank has a modest presence here with a total of eleven freestanding and instore branches. In addition, UBOC has thirteen ATMs. As of June 30, 1999, it had almost \$600 million in deposits. This represents 3% of the total California deposits of the bank and a deposit market share of 1.5%. The bank has a market rank of 13.

Competition is strong in the area; however, the market is dominated by Bank of America NT&SA, with a 30% deposit market share. The next two closest competitors are Wells Fargo Bank, NA and Washington Mutual Bank, FA, each with a deposit market share of 11%. In addition to these banks, there are also numerous credit unions and mortgage companies operating in the AA that have an impact on overall competition.

The economy is good. The southern portion of this AA has seen continued influx of high technology companies, research and development companies, and light industry. While the area has suffered from early military cutbacks and the closing of several bases, these areas are slowly being converted into business centers. The area is also a major port for international trade as well and has an international airport. The eastern

portion of the AA is not as heavily populated as the area adjacent to the Bay Area. It has evolved from an agricultural area to an urban industrial area. Updated unemployment data from March 2001, reveals a low unemployment rate of 2.9%.

Housing costs are very high. Although incomes are generally considered high throughout the greater AA, income levels have not kept pace with home prices or rent. Median home prices in the area is over \$329,000 as of the fourth quarter of 2000.

Many organizations in the AA benefit from community development activities. Many of the organizations, however, are located in the Oakland area. There are low-income credit unions, a CDFI, and many organizations that work to create or maintain existing affordable housing. Outside of Oakland, there are fewer organized non-profit groups and opportunities for developing relationships between financial institutions are more limited.

Opportunities in single family housing, consumer loans and small business loans abound in the area. Affordable housing needs are a major issue in the MSA. Nationally, the Oakland MSA now ranks very low on the affordability scale at 173 out of 180 MSA's. In addition, a lack of viable affordable housing projects has produced fierce competition between financial institutions and nonprofit groups.

Contacts with community organizations showed a continued need for affordable housing accompanied by flexible loan terms that will help low- and moderate-income people obtain financing as well as a need for small business loans. Several contacts also stressed the need for banks to provide more technical assistance to small business owners.

## Orange County MSA

Demographic Information for Full-Scope Area: Orange County MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	484	2.89	24.38	44.01	27.48	1.24
Population by Geography	2,410,556	3.61	26.73	42.01	27.64	0.00
Owner-Occupied Housing by Geography	496,824	0.77	17.19	45.08	36.96	0.00
Businesses by Geography	125,752	4.28	27.32	39.12	24.50	4.78
Farms by Geography	1,646	3.16	23.57	42.41	29.47	1.40
Family Distribution by Income Level	590,490	18.65	19.00	23.57	38.77	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	222,346	5.61	37.24	41.92	15.24	0.00
Median Family Income		Median Housing Value		=		
HUD Adjusted Median Family Income for 2000	= \$51,269	Unemployment Rate March 2001(BLS)		= \$250,342		
Households Below the Poverty Level	= \$69,600			=		
	=			= 2.4%		
	6.08%					

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

Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The bank's AA is the Orange County MSA, #5945 and it includes 16 cities and various unincorporated areas. As of January 2000, the MSA population of over 2.8 million persons ranked second in the state and fifth Nationally. The county is primarily suburban in nature with several large cities and limited rural areas in its eastern portion. The El Toro (Camp Pendleton) Marine Base makes up most of the southernmost part of the county.

The bank has a large presence here with a total of 33 freestanding and instore branches. In addition, UBOC has 41 ATMs, of which 14 are off-premises. As of June 30, 1999, it had some \$1.8 billion in deposits. This represents 8% of the total California deposits of the bank, a deposit market share of 4.4% and a market rank of five. Loans made in this MSA represent 13% of all California lending. The bank has a market rank of six for small business lending but is not considered a significant player in the residential mortgage market. Major competitors include, Bank of America NT & SA, Wells Fargo Bank, NA and Washington Mutual Bank, FA. Bank of America dominates the deposit market with an 18% market share followed by Washington Mutual at 15%.

The county's economy declined during the early 1990's for multiple reasons including the recession and a county bankruptcy. Downsizing in the aerospace and defense industries caused job losses and a decline in real estate values. The economy has rebounded and at 2.4 in 2001, unemployment was well below the state average. D&B

1999 data shows that companies with sales under \$1 million represented 73% of total businesses. Major industries are services, retail trade and finance, insurance, and real estate.

Housing affordability continues to be an issue with housing prices rapidly escalating. The median price of a home has increased some 49% to \$336,000 over the past three years. The county wide affordability factor for home ownership continues to drop and is now at 28%.

Community contacts coupled with bank provided information for the area revealed a need for all types of affordable housing. This is considered a very critical need. Other needs include micro-loans for startups and emerging small businesses. Community development opportunities appear moderate, focusing on affordable housing and redevelopment.



## San Diego MSA

Demographic Information for Full-Scope Area: San Diego MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	445	5.84	21.57	43.37	26.29	2.92
Population by Geography	2,498,016	6.24	23.15	43.98	25.26	1.36
Owner-Occupied Housing by Geography	477,564	1.88	13.42	49.05	35.64	0.01
Businesses by Geography	99,049	3.73	23.40	44.31	28.37	0.19
Farms by Geography	2,027	0.94	16.33	47.26	35.47	0.00
Family Distribution by Income Level	605,144	19.87	18.72	22.32	39.09	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	233,527	10.85	33.93	42.51	12.71	0.00
Median Family Income		Median Housing Value		=		
HUD Adjusted Median Family Income for 2000	= \$39,798	Unemployment Rate March 2001(BLS)		= \$186,159		
Households Below the Poverty Level	= \$53,700			=		
	=			2.6%		
	9.26. %					

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

Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The bank's AA is the entire San Diego County MSA, #7320. It includes the City of San Diego, 17 other incorporated cities, and several unincorporated areas. San Diego is the sixth largest city in the country. The area has one eighth of the population of the state. It is a center for education and research with both public and private colleges and universities within the city. San Diego's economic base previously relied on defense and military spending. The area now has a more diverse economic base including a growing biotechnology industry, international trade, high tech manufacturing, professional services and tourism.

The bank has a major presence here with a total of 55 freestanding, instore, and "Cash and Save" branches. In addition, UBOC has 70 ATMs, of which 11 are off-premises. As of June 30, 1999, it had more than \$2.9 billion in deposits. This represents 13% of the bank's total California deposits, a deposit market share of 9% and a market rank of four. Loans made in this MSA represent 19% of all California lending. The bank also has a market rank of four for small business lending but is not considered a significant player in the residential mortgage market.

The bank operates in a very competitive financial environment in the MSA. There are 66 other financial institutions in the AA. Local competition consists primarily of six other large banks, a finance company, and two large brokerage houses. Major competitors based on deposit market share include, Bank of America NT & SA, Washington Mutual

Bank, FA, and Wells Fargo Bank, NA. However, from a small business lending perspective, one bank and two credit card banks dominate the market with a combined market share exceeding 50%.

The 2000 HUD adjusted median family income (MFI) of \$55,700. The cost of living is about 28% above the national average. As of the fourth quarter of 2000, the median price of a home in the MSA was \$278 thousand, an increase of some 19% from the fourth quarter 1999. The San Diego MSA is the eighth least affordable housing market in the nation. As indicated, affordability is a significant issue.

The local economy is strong and growing. Major industries include high tech manufacturing, real estate development, technology, retail, tourism, international trade, and government/military, to a lesser degree. The unemployment rate in San Diego County was 3% in 1999.

Through our contacts with bank management and local community development groups, the primary credit needs of the community are for redevelopment, affordable housing, loans to small business (including micro-loans), and various consumer loans. Community Development needs are high, but the opportunities are moderate.

## San Francisco MSA

Demographic Information for Full-Scope Area: San Francisco MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	361	6.37	17.73	40.44	31.86	3.60
Population by Geography	1,603,678	6.52	20.53	44.94	27.91	0.10
Owner-Occupied Housing by Geography	310,255	1.20	11.96	46.73	40.11	0.00
Businesses by Geography	93,014	14.81	19.18	37.79	28.09	0.13
Farms by Geography	1,174	3.15	18.57	42.84	35.18	0.26
Family Distribution by Income Level	366,943	19.83	18.18	22.65	39.34	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	139,492	9.92	29.03	44.90	16.16	0.00
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$49,282 = \$74,900 = 7.7%	Median Housing Value Unemployment Rate March 2001(BLS)		= \$328,885 =	2.5%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

UBOC's AA covers the entire San Francisco MSA, #7360, which is urban in nature and consists of Marin, San Francisco, and San Mateo Counties. This MSA has three economically diverse counties. San Francisco is a financial and government center, San Mateo is a home of ancillary businesses to the computer industry in nearby Silicon Valley, and Marin is the northern California center for the motion picture business and other high tech industries. The area is also a booming tourist center.

San Francisco is the headquarters location of the bank. While having many operational units located in the MSA, it has a rather modest branch presence. There are a total of ten traditional branches and one instore. They have 13 ATM's. However, being a financial center, it has some \$5.5 billion in deposits, accounting for 23% of all UBOC's California deposits. It also has a significant market share of all deposits in the MSA at 8% and a market rank of three. Loans made in this MSA represent 6% of all California lending. The bank has a market rank of nine for small business lending but is not considered a significant player in the residential mortgage market. Major competitors include, Wells Fargo Bank, Bank of America NT & SA, Washington Mutual Bank, FA, and California Federal Bank. The first two competitors have major deposit markets shares of 27% and 24% respectively.

The economy is growing, diverse, and strong. The largest business sectors are services, retail trade, finance-insurance-real estate, wholesale trade, and construction according to 1999 Dun & Bradstreet data. High-tech firms play an increasingly important role in the economy of the MSA. San Francisco is the city headquarters for many large corporations, including three of the largest banks in the United States. The current unemployment rate is 2% according to the U.S. Bureau of Labor Statistics. The ten largest employers are United Airlines, University of California at San Francisco, Oracle Corporation, Bank of America Corporation, Pacific Gas & Electric Company, Kaiser Permanente, UCSF Stanford Health Care, Wells Fargo & Company, Charles Schwab Corporation, and Pacific Bell according to the San Francisco Business Times.

The San Francisco MSA is the highest income, highest cost region in the state of California. It is also the most expensive area in the country to live. The median price for a single family home is \$590,000, almost doubled from the last evaluation period. In San Francisco, only 14% of the population can afford to own median priced homes. San Mateo and Marin counties are primarily owner-occupied areas while renters in all types of properties dominate San Francisco. The population is growing and is currently estimated at 1.69 million persons by the U.S. Census Bureau.

The MSA presents lending opportunities to meet consumer, small business, and housing needs. As most of the MSA is built out, new housing developments are primarily in-fill projects. This presents a particular challenge to financial institutions, governmental and nonprofit groups operating in the MSA.

Information obtained from the bank and community contacts show that the predominant needs are for financing of affordable housing and micro-loans and other types of credit for small businesses. There are a number of private and government organizations that have special programs to meet the needs of the San Francisco MSA. Barriers for these programs are the high cost of real estate, the number of entities competing to participate in programs, the 'not in my back yard' (NIMBY) syndrome, and the need for special expertise.

## San Jose MSA

Demographic Information for Full-Scope Area: San Jose MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	385	2.86	15.32	41.30	18.18	22.34
Population by Geography	1,497,577	3.91	21.23	54.69	20.18	0.00
Owner-Occupied Housing by Geography	307,324	1.43	13.79	57.16	27.62	0.00
Businesses by Geography	67,329	6.19	23.12	51.93	18.54	0.21
Farms by Geography	1,167	4.11	22.62	52.96	20.31	0.00
Family Distribution by Income Level	364,307	18.71	18.69	23.99	38.61	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	136,254	6.28	30.21	53.16	10.35	0.00
Median Family Income	= \$53,771	Median Housing Value		=		
HUD Adjusted Median Family Income for 2000	= \$87,000	Unemployment Rate March 2001(BLS)		=		\$287,666
Households Below the Poverty Level	= 5.98%			=		2.2%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The bank's AA is the San Jose MSA, #7400 which includes all of Santa Clara County, the fifth largest county in California. The area encompasses "Silicon Valley" which is home to numerous businesses in the information technology industry. The AA's economy is robust but the technology sector has suffered some over the past 12 months. Major industries in the area are manufacturing (including information technology), services (including business services), and retail trade.

While UBOC maintains a modest branch presence in this MSA, it does have a moderate deposit and loan presence. It has 11 branch offices and 13 ATM's. The branches held, as of June 30, 1999, more than \$1 billion in deposits. This represents 5% of the bank's total California deposits, a market share of 3%, and a market rank of eight. Loans made in this MSA represent 4% of all California lending. The bank has a market rank of ten for small business lending but is not considered a significant player in the residential mortgage market. Major competitors include, Bank of America NT & SA, Wells Fargo Bank, Washington Mutual Bank, FA, and Silicon Valley Bank. Bank of America dominates the deposit market with a 17% market share.

The area has approximately 5,500 information technology firms, and approximately 25% of the workers of the area are directly employed in information technology industries. Santa Clara County ranks seventh in California and 31<sup>st</sup> in the nation in total retail sales.

The ongoing growth of the area is fueled by the location of several of the giants of the high technology industry. It has experienced high job growth over the last few years. The area also has one of the lowest unemployment rates in the state at 3.1%. The growth in the area is offset by the expensive cost of housing, one of the highest in the country. In 2000, the median price of a home was \$514,000. Nationally this ranks the MSA on affordability at 176 out of 180 MSAs. Only 19% of the households can afford a median priced-home, single-family home in the MSA.

Rents are also expensive in Santa Clara County. Many LMI families are being forced into adjacent counties in order to afford an apartment. The county's vacancy rate was only 1.6% during the fourth quarter of 2000. In addition, there are very few public housing developments and/or units in the county.

Loans for housing and small businesses are the most pressing needs in the community. The lack of affordable housing has forced many individuals employed in Silicon Valley to move to adjoining counties. The county has several developers active in building affordable housing.

Individuals in the community knowledgeable about community credit needs identify the area's major credit needs as affordable housing and small business loans.

Community development opportunities are available; however, competition for these activities is very high.

## State of Washington Full-Scope Areas

### Seattle-Bellevue-Everett MSA

Demographic Information for Full-Scope Area: Seattle-Bellevue-Everett MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	439	2.96	17.08	58.77	18.45	2.73
Population by Geography	2,033,156	2.19	16.18	62.80	18.75	0.08
Owner-Occupied Housing by Geography	490,086	0.58	11.79	65.01	22.62	0.00
Businesses by Geography	119,492	2.75	21.15	55.71	20.39	0.01
Farms by Geography	3,167	1.23	13.20	67.22	18.35	0.00
Family Distribution by Income Level	523,808	16.70	18.94	26.92	37.44	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	186,691	2.93	23.47	63.59	10.02	0.00
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$43,103 = \$65,800 = 7.54%	Median Housing Value Unemployment Rate March 2001 (BLS)		= \$141,463 = 4.2%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census and 2000 HUD updated MFI.

UBOC has a very modest presence in the state of Washington and in this AA. The bank's AA encompasses the entire Seattle-Bellevue-Everett MSA, #7600. Approximately 66% of UBOC's statewide deposits, loans and branch network are in this MSA. The bank has two branches in the AA. The bank ranks in the mid 20's in deposit size among 110 FDIC-insured depository institutions in the MSA. Its share of those deposits is extremely small, constituting less than .5% of the total. The deposit market in the MSA is dominated by Bank of America, NT&SA, Washington Mutual Savings Bank, and US Bank, NA which together control over 50% of the total. Other large deposit takers are Key Bank NA, Washington Federal Savings & Loan, and Wells Fargo Bank, NA.

This MSA consists of King, Snohomish, and Island Counties. Seattle is the largest city in the region followed by Bellevue, Everett, and Federal Way. Seattle is the commercial center of the Pacific Northwest in the United States. It constitutes the largest metropolitan area between San Francisco, California, and Vancouver, British Columbia. The economy was long anchored by lumbering, shipping, and aerospace. Those remain significant, but high-tech companies, most notably MicroSoft, now dominate, and Seattle is one of the country's major centers for the computer and software industry.

Tourism is also a major industry in the area, due to the significant scenic attractions, as well as because of Seattle's position as a gateway for travel to Alaska and British Columbia.

The region has the highest per capita income, average wage, and median household income in the state. Its economy is also influenced by one of the highest cost of living indexes (especially in the area of housing) in the nation. The growth and dominance of the high-tech sector has resulted in significant growth in personal income and personal wealth in the region. Available sources indicate that nearly one fifth of the jobs in Washington are now in technology-based industries, with an average annual wage of over \$65 thousand. This phenomenon has caused rapid (although recently leveling) increase in the cost of housing in the area and has made it more difficult for LMI persons to obtain good housing. The estimated cost of living in Seattle is some 15-20% higher than the U.S. average.

Nonetheless, the robust economy has created significant opportunities for expansion and development of various businesses. Total employment increased in the greater Seattle area by about 8% between 1999 and 2000.

Identified credit needs include affordable housing, home equity loans, rehabilitation loans, small business loans, first-time home buyer classes, and consumer loans. In addition, opportunities for community development and small business lending in the MSA area appear to be significant. Although the "high-tech revolution" has brought great additional prosperity to the region, not every sector has been directly affected. Numerous neighborhoods and individuals continue to need the types of benefits that community development activities provide. In addition, the burgeoning economy has created opportunities for additional small business creation and expansion.



## State of Oregon Full-Scope Areas

### Portland-Vancouver, OR-WA Multistate Metropolitan Area (partial AA)

Demographic Information for Full-Scope Area: Portland-Vancouver, OR-WA Multistate Metropolitan Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	277	2.89	20.58	53.79	21.30	1.44
Population by Geography	1,174,291	1.49	17.82	57.99	22.69	0.01
Owner-Occupied Housing by Geography	280,524	0.87	13.89	58.54	26.71	0.00
Businesses by Geography	64,839	1.66	20.54	57.03	20.75	0.00
Farms by Geography	2,176	0.18	8.69	68.89	22.20	0.05
Family Distribution by Income Level	305,795	17.20	18.44	25.45	38.91	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	108,972	2.75	25.38	59.25	12.61	0.00
Median Family Income	= 36,705	Median Housing Value		= 75,850		
HUD Adjusted Median Family Income for 2000	= 53,700	Unemployment Rate March 2001 (BLS)		= 4.2%		
Households Below the Poverty Level	= 9.64%					

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

Source: 1990 U.S. Census and 2000 HUD updated MFI.

UBOC has a very limited presence in the Portland-Vancouver MSA, #6440 operating in just three of the five Oregon counties in the MSA, Clackamas, Multnomah, and Washington. The bank has no presence in the Vancouver portion of the multistate MSA. This AA does not arbitrarily exclude any LMI geographies.

UBOC has two branches and one ATM within the AA. It has some \$128 million in deposits, garnering a market share of only .76%. Other major banks dominate this market led by US Bank, NA whom has a market share exceeding 20%. Other key competitors are Bank of America National Trust and Savings Association (15% deposit market share), Washington Mutual Bank (14% deposit market share), Wells Fargo Bank, NA (10% deposit market share), and Keybank NA (7% deposit market share). This information is taken from the June 30, 1999 FDIC Deposit Market Share Reports.

Portland is Oregon's largest city and contains over half of the entire state's population. The area has been experiencing rapid population growth as former California residents seek to relocate to an area with a good quality of life and more affordable living conditions. When combined with the positive economic growth that the area has

experienced, the result has been dramatically escalating housing costs. Despite the strong economy, wages have tended to remain flat, further exacerbating the widening affordability gap.

Affordable housing is an important issue. Increased needs for affordable housing units result from the population growth and a lack of affordable development land. The city has implemented controls designed to preserve natural areas and prevent urban sprawl. With the supply limited, the cost of undeveloped land as well as existing developed properties increases. The city is trying to increase the number of residential units in the central city and provide incentives that will foster job creation.

Portland has an Enterprise Zone that offers financial incentives for qualified businesses expanding or relocating to the targeted areas. There are also several state-sponsored programs available for businesses locating in this zone. A portion of Portland has received designation as a Brownsfields Showcase Community. This enables the area to receive technical and financial support for specific economic development efforts that clean up contaminated properties, the environment and help to build economic vitality and job opportunities. There are several community development organizations in the area that focus on affordable housing issues.

We reviewed four contacts with community organizations that had been completed by the OCC and other regulators during the last two years. These organizations focused on affordable housing issues and the creation of small business opportunities. Three contacts thought that the most critical need was for housing.

## Territory of Guam Full-Scope Area

### Guam AA

Demographic Information for Full-Scope Area: Guam AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	55	0.00	23.64	58.18	12.73	5.45
Population by Geography	133,152	0.00	16.44	70.54	11.45	1.57
Owner-Occupied Housing by Geography	14,308	0.00	3.98	80.16	15.86	0.0
Businesses by Geography	NA	NA	NA	NA	NA	NA
Farms by Geography	NA	NA	NA	NA	NA	NA
Family Distribution by Income Level	26,219	19.10	20.50	17.09	43.31	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	10,384	0.00	25.76	67.54	6.70	0.0
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$33,020 = \$45,700 = 12.61%	Median Housing Value = NA Unemployment Rate March 2001(BLS) = 2.24%				

(\*) The NA category consists of geographies that have not been assigned an income classification or for information that is not available.

Source: 1990 U.S. Census and 2000 HUD updated MFI.

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

UBOC has a modest presence in the Guam AA, which covers the entire Territory of Guam. Local law classified UBOC as a foreign bank, which restricts the bank to two branches. It has two full service branches and one ATM on this island. There are numerous banking and finance company competitors, 12 of which were used for comparative analysis, based on June 30, 1999 FDIC deposit information. Amongst those with deposit insurance, the bank has a deposit market rank of five. Key leaders in this market, based on deposits are Citibank, NA, Bank of Guam, Bank of Hawaii, and First Hawaiian Bank. The first two banks dominate the deposit market with 26% and 22% market shares, respectively.

Guam is an unincorporated Territory of the United States. The bank's AA consists of the entire Island, which has a population that is reaching 160 thousand. The population is diverse although almost 40% represent indigenous Chamorros. Filipinos, Caucasians, Chinese, Japanese and Koreans constitute the bulk of the remaining population base. Various income levels are spread throughout the island municipalities or districts.

According to available data, extending loans is challenging, especially in the mortgage area where building costs are very high. Thus, affordable housing is a primary need. Finally, due to a lack of infrastructure community development opportunities are limited.

## Commonwealth of the Northern Mariana Islands Full-Scope Area

### Saipan AA

Demographic Information for Full-Scope Area: Saipan AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	5.26	10.53	68.42	10.53	5.26
Population by Geography	43,345	0.08	4.08	89.47	6.28	0.09
Owner-Occupied Housing by Geography	2,981	0.020	6.57	85.94	7.28	0.0
Businesses by Geography	NA	NA	NA	NA	NA	NA
Farms by Geography	NA	NA	NA	NA	NA	NA
Family Distribution by Income Level	5,317	23.98	16.29	17.53	42.20	0.0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	2,141	0.19	7.52	86.64	5.65	0.0
Median Family Income HUD Adjusted Median Family Income for 2000 Households Below the Poverty Level	= \$21,275 = NA = 35.71%	Median Housing Value Unemployment Rate March 2001(1990 US Census)		= NA = 1.89%		

(\*)The NA category consists of geographies that have not been assigned an income classification or for information that is not available.

Source: 1990 U.S. Census and 2000 HUD updated MFI.

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

UBOC has a modest presence in the Saipan AA. This AA covers the Island of Saipan, which is part of the United States Commonwealth of the Northern Mariana Islands. It has one branch on this island. There are a number of banking and finance company competitors; only, five of which have FDIC deposit insurance for comparative analysis. Several key competitors are foreign owned banks. Amongst those with deposit insurance, the bank has a deposit market rank of three. Key leaders in this market, based on deposits are Bank of Guam and Bank of Hawaii.

Saipan is a part of an unincorporated Commonwealth of the United States. It is some 100 miles north of Guam and located closer to Japan than the Hawaiian Island. The entire Commonwealth is made up of 14 islands of which Saipan is the largest. Based on 1995 mid decade census, the population then totaled some 60 thousand persons. Non-United States citizens make up over 50% of the population. Various income levels are spread throughout the island municipalities or districts.

Saipan's economy is largely based on tourism, mostly stemming from Japan. Its only other major industry is manufacturing which thrives on a special U. S. covenant-based exemption that allows local garment factories to export to the United States without paying customs duty.

As is the case for Guam, extending loans is challenging. In particular, due to land ownership restrictions, home-lending activity is minimal. With high building costs and low wages, there is a need for all types of lending. Finally, due to a lack of infrastructure, community development opportunities are limited.

## Appendix D: Tables of Performance Data

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### Table of Contents

**Content of Standardized Tables** ..... D-2

**Tables of Performance Data**

State of California ..... D-5

State of Washington ..... D-18

State of Oregon ..... D-25

Territory of Guam ..... D-32

Commonwealth of the Northern Mariana Islands..... D-37

## Tables

### Content of Standardized Tables

A separate set of tables is provided for each state. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Evaluation). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/AA; 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/AA.

The following is a listing and brief description of the tables included in each set:

- 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 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 rank and 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 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 rank and market share information based on the most recent aggregate market data available.
- Table 6. 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 rank and market share



information based on the most recent aggregate market data available.

- Table 7. 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 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 Loans** - See Table 7.
- Table 9. Borrower Distribution of Home Mortgage Refinance Loans** - See Table 7.
- Table 10. 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 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$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. 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. 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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.

**Table 13. 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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

**Table 14. 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 the population 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 MSA/assessment area.

## California Tables

Table 1. Lending Volume

LENDING VOLUME		Evaluation Period: 01/01/1998 TO 12/31/2000										
MSA/Assessment Area	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans (#) in AA
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Scope</b>												
Los Angeles-Long Beach MSA	37.55	1,419	476,507	7,151	766,514	7	1,759	29	63,348	8,606	1,308,128	18.60
Oakland MSA	2.52	531	176,301	1,471	219,075	1	75	15	32,768	2,018	428,219	4.36
Orange County MSA	7.85	1,116	451,360	4,998	385,069	8	1,950	3	13,380	6,125	851,759	13.24
San Diego MSA	13.00	2,467	610,881	9,295	552,409	17	636	23	33,143	11,802	1,197,069	25.51
San Francisco MSA	23.49	659	393,248	1,964	345,769	2	600	22	20,248	2,647	759,865	5.72
San Jose MSA	5.14	591	228,333	1,255	169,612	3	205	10	67,600	1,859	465,750	4.02
<b>Limited Scope</b>												

\* Deposit Data as of June 30, 1999

LENDING VOLUME												
Evaluation Period: 01/01/1998 TO 12/31/2000												
Bakersfield MSA	0.89	267	21,980	654	42,879	39	9,483	1	3,500	961	77,842	2.08
Fresno MSA	1.54	390	37,200	1,826	84,230	116	22,631	4	3,331	2,336	147,392	5.05
Modesto MSA	0.19	42	3,977	222	22,717	270	47,928	0	0	534	74,622	1.16
Merced MSA	0.01	15	1,200	30	535	89	12,209	0	0	134	13,944	0.29
Redding MSA	0.13	48	8,064	419	64,979	19	2,568	0	0	486	75,611	1.05
Riverside-San Bernardino MSA	2.75	780	131,509	2,124	188,790	9	1,823	5	12,800	2,918	334,922	6.31
Sacramento MSA	1.57	987	128,531	1,107	117,177	14	3,672	6	12,360	2,114	261,740	4.57
Salinas MSA	0.17	156	27,014	49	3,319	26	5,665	0	0	231	35,998	0.50
San Luis Obispo-Atascadero-Paso Robles MSA	0.23	57	8,446	104	11,028	0	0	0	0	161	19,474	0.35
Santa Barbara-Santa Maria-Lompoc MSA	0.37	93	20,182	203	13,635	5	275	0	0	301	34,092	0.65
Stockton-Lodi MSA	0.30	186	21,081	380	40,731	105	19,693	0	0	671	81,505	1.45
Vallejo-Fairfield-Napa MSA	0.08	61	18,448	111	15,442	3	620	3	15,675	178	50,185	0.38
Visalia-Tulare-Porterville MSA	0.64	216	15,259	618	25,014	42	5,295	1	6,622	877	52,190	1.90
Yolo MSA	0.13	75	8,870	100	12,320	22	4,619	3	4,150	200	29,959	0.43
Yuba City MSA	0.10	14	2,233	66	8,826	70	16,171	0	0	150	27,230	0.33
Non-MSA Assessment Areas	1.22	248	27,316	659	26,611	56	11,184	3	15,592	966	80,703	2.09

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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**
<b>Full Scope</b>																
Los Angeles Long Beach .MSA	2.34	1.39	14.25	6.62	34.73	23.34	48.68	68.64	146	0.07	0.07	0.05	0.05	0.10	574	11.57
Oakland MSA	3.78	1.74	13.15	7.64	46.62	46.88	36.44	43.75	122	0.06	0.00	0.09	0.04	0.09	288	5.80
Orange County MSA	0.77	0.39	17.19	14.53	45.08	32.75	36.96	51.94	92	0.18	0.00	0.22	0.13	0.23	516	10.40
San Diego MSA	1.88	7.27	13.42	15.29	49.05	31.33	35.64	46.12	51	0.43	1.90	0.64	0.40	0.34	1,197	24.12
San Francisco MSA	1.20	1.42	11.96	13.07	46.73	35.51	40.11	50.00	61	0.26	0.39	0.16	0.18	0.38	352	7.09
San Jose MSA	1.43	1.37	13.79	15.46	57.16	57.73	27.62	25.43	92	0.11	0.10	0.17	0.08	0.14	291	5.86
<b>Limited Scope</b>																

\* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Bakersfield MSA	1.34	1.20	23.59	28.92	33.22	7.23	41.85	62.65	81	0.11	0.00	0.08	0.02	0.17	83	1.67
Fresno MSA	1.68	0.00	17.28	17.32	47.67	41.73	33.37	40.94	52	0.33	0.00	0.40	0.40	0.25	127	2.56
Merced MSA	0.04	0.00	11.82	0.00	70.40	50.00	17.73	50.00	124	0.05	0.00	0.00	0.04	0.13	4	0.08
Modesto MSA	0.27	0.00	14.34	7.14	57.80	64.29	27.58	28.57	117	0.06	0.00	0.00	0.08	0.03	14	0.28
Redding MSA	0.00	0.00	9.27	7.69	75.62	69.23	15.11	23.08	80	0.08	0.00	0.00	0.08	0.13	13	0.26
Riverside-San Bernardino MSA	0.76	0.92	17.24	16.82	50.68	44.95	31.33	37.31	130	0.08	0.24	0.09	0.08	0.09	327	6.59
Sacramento MSA	2.43	1.50	12.52	13.64	53.21	66.85	31.84	18.01	49	0.45	0.31	0.65	0.67	0.16	733	14.77
Salinas MSA	0.19	0.00	12.31	44.14	45.24	43.24	42.25	12.61	37	0.56	0.00	1.37	0.49	0.20	111	2.24
San Luis Obispo... MSA	0.00	0.00	7.06	0.00	81.99	81.82	10.95	18.18	106	0.06	0.00	0.00	0.07	0.00	22	0.44
Santa Barbara... MSA	0.00	0.00	16.32	8.82	40.63	50.00	43.05	41.18	84	0.12	0.00	0.07	0.15	0.10	34	0.69
Stockton-Lodi MSA	1.09	1.47	20.50	16.18	47.63	41.18	30.78	41.18	84	0.16	0.81	0.29	0.15	0.11	68	1.37
Vallejo-Fairfield-Napa MSA	0.53	2.70	9.54	10.81	62.12	62.16	27.81	24.32	138	0.05	3.57	0.06	0.05	0.00	37	0.75
Visalia-Tulare-Porterville MSA	0.00	0.00	20.01	27.78	48.44	44.44	31.56	27.78	44	0.30	0.00	0.48	0.37	0.12	54	1.09
Yolo MSA	0.06	0.00	23.63	35.90	38.67	41.03	37.64	23.08	45	0.33	0.00	0.78	0.25	0.27	39	0.79
Yuba City MSA	0.00	0.00	20.39	50.00	50.98	0.00	28.64	50.00	0	0.00	0.00	0.00	0.00	0.00	2	0.04
Non-MSA Assessment Areas	1.32	0.00	25.61	18.42	46.85	34.21	26.21	47.37	63	0.26	0.00	0.27	0.23	0.30	76	1.52

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1998 TO 12/31/2000						
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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																

\* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Los Angeles-Long Beach MSA	2.34	0.00	14.25	14.29	34.73	42.86	48.68	42.86	149	0.02	0.00	0.00	0.03	0.02	14	12.50
Oakland MSA	3.78	25.00	13.15	0.00	46.62	25.00	36.44	50.00	112	0.03	0.26	0.00	0.00	0.04	8	7.14
Orange County MSA	0.77	0.00	17.19	45.45	45.08	36.36	36.96	18.18	120	0.03	0.00	0.00	0.07	0.00	11	9.82
San Diego MSA	1.88	8.33	13.42	4.17	49.05	66.67	35.64	20.83	69	0.10	0.00	0.00	0.20	0.00	24	21.43
San Francisco MSA	1.20	0.00	11.96	0.00	46.73	0.00	40.11	100.00	0	0.00	0.00	0.00	0.00	0.00	1	0.89
San Jose MSA	1.43	0.00	13.79	0.00	57.16	0.00	27.62	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
<b>Limited Scope</b>																
Bakersfield MSA	1.34	0.00	23.59	16.67	33.22	16.67	41.85	66.67	52	0.13	0.00	0.00	0.25	0.11	6	5.36
Fresno MSA	1.68	0.00	17.28	0.00	47.67	28.57	33.37	71.43	69	0.06	0.00	0.00	0.00	0.13	7	6.25
Merced MSA	0.04	0.00	11.82	0.00	70.40	0.00	17.73	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
Modesto MSA	0.27	0.00	14.34	100.00	57.80	0.00	27.58	0.00	0	0.00	0.00	0.00	0.00	0.00	1	0.89
Redding MSA	0.00	0.00	9.27	0.00	75.62	0.00	15.11	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
Riverside-San Bernardino MSA	0.76	0.00	17.24	8.33	50.68	45.83	31.33	45.83	105	0.03	0.00	0.00	0.04	0.02	24	21.43
Sacramento MSA	2.43	0.00	12.52	25.00	53.21	25.00	31.84	50.00	119	0.02	0.00	0.00	0.00	0.05	4	3.57
Salinas MSA	0.19	0.00	12.31	0.00	45.24	0.00	42.25	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
San Luis Obispo... MSA	0.00	0.00	7.06	0.00	81.99	100.00	10.95	0.00	60	0.29	0.00	0.00	0.34	0.00	1	0.89
Santa Barbara...MSA	0.00	0.00	16.32	0.00	40.63	0.00	43.05	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
Stockton-Lodi MSA	1.09	0.00	20.50	0.00	47.63	100.00	30.78	0.00	70	0.06	0.00	0.00	0.14	0.00	2	1.79
Vallejo-Fairfield-Napa MSA	0.53	0.00	9.54	0.00	62.12	100.00	27.81	0.00	0	0.00	0.00	0.00	0.00	0.00	1	0.89
Visalia-Tulare-Porterville MSA	0.00	0.00	20.01	0.00	48.44	100.00	31.56	0.00	54	0.14	0.00	0.00	0.31	0.00	1	0.89
Yolo MSA	0.06	0.00	23.63	0.00	38.67	0.00	37.64	100.00	38	0.31	0.00	0.00	0.00	0.88	1	0.89
Yuba City MSA	0.00	0.00	20.39	0.00	50.98	0.00	28.64	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
Non-MSA Assessment Areas	1.32	0.00	25.61	16.67	46.85	50.00	26.21	33.33	44	0.26	0.00	0.00	0.29	0.32	6	5.35

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
Los Angeles-Long Beach MSA	2.34	0.85	14.25	6.78	34.73	22.15	48.68	70.22	103	0.14	0.02	0.09	0.11	0.18	826	15.57
Oakland MSA	3.78	1.29	13.15	9.05	46.62	34.48	36.44	55.17	129	0.07	0.00	0.06	0.06	0.09	232	4.37
Orange County MSA	0.77	0.17	17.19	5.98	45.08	38.29	36.96	55.56	80	0.20	0.00	0.14	0.16	0.25	585	11.03
San Diego MSA	1.88	2.76	13.42	12.72	49.05	41.17	35.64	43.35	55	0.40	0.76	0.41	0.38	0.41	1,234	23.27
San Francisco MSA	1.20	0.66	11.96	13.91	46.73	25.83	40.11	59.60	75	0.19	0.00	0.21	0.11	0.26	302	5.69
San Jose MSA	1.43	1.35	13.79	9.46	57.16	52.70	27.62	36.49	110	0.09	0.11	0.05	0.08	0.12	296	5.58
<b>Limited Scope</b>																

\* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

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



Bakersfield MSA	1.34	0.00	23.59	60.67	33.22	9.55	41.85	29.78	42	0.62	0.00	2.14	0.28	0.25	178	3.36
Fresno MSA	1.68	0.39	17.28	22.83	47.67	35.43	33.37	41.34	32	0.84	0.40	1.29	0.72	0.82	254	4.79
Merced MSA	0.04	0.00	11.82	0.00	70.40	72.73	17.73	27.27	100	0.16	0.00	0.00	0.22	0.00	11	0.21
Modesto MSA	0.27	0.00	14.34	3.70	57.80	44.44	27.58	51.85	96	0.18	0.00	0.12	0.10	0.36	27	0.51
Redding MSA	0.00	0.00	9.27	2.94	75.62	76.47	15.11	20.59	51	0.41	0.00	0.00	0.49	0.32	34	0.64
Riverside-San Bernardino MSA	0.76	0.23	17.24	19.01	50.68	50.47	31.33	30.28	102	0.20	0.00	0.36	0.24	0.11	426	8.03
Sacramento MSA	2.43	1.61	12.52	9.24	53.21	50.20	31.84	38.96	106	0.14	0.41	0.17	0.16	0.11	249	4.69
Salinas MSA	0.19	0.00	12.31	35.56	45.24	46.67	42.25	17.78	70	0.22	0.00	0.68	0.22	0.12	45	0.85
San Luis Obispo... MSA	0.00	0.00	7.06	0.00	81.99	91.18	10.95	8.82	66	0.22	0.00	0.00	0.25	0.15	34	0.64
Santa Barbara...MSA	0.00	0.00	16.32	10.17	40.63	49.15	43.05	40.68	83	0.14	0.00	0.07	0.21	0.11	59	1.11
Stockton-Lodi MSA	1.09	0.86	20.50	23.28	47.63	43.97	30.78	31.90	67	0.36	0.91	0.72	0.40	0.16	116	2.19
Vallejo-Fairfield-Napa MSA	0.53	0.00	9.54	4.35	62.12	73.91	27.81	21.74	139	0.07	0.00	0.00	0.11	0.02	23	0.43
Visalia-Tulare-Porterville MSA	0.00	0.00	20.01	25.47	48.44	52.80	31.56	21.74	28	0.96	0.00	1.40	1.15	0.51	161	3.04
Yolo MSA	0.06	0.00	23.63	11.43	38.67	25.71	37.64	62.86	78	0.22	0.00	0.22	0.08	0.35	35	0.66
Yuba City MSA	0.00	0.00	20.39	18.18	50.98	27.27	28.64	54.55	80	0.16	0.00	0.00	0.12	0.25	11	0.21
Non-MSA Assessment Areas	1.32	0.00	25.61	28.92	46.85	40.36	26.21	30.72	31	0.82	0.00	1.51	0.80	0.60	166	3.12

**Table 5. Geographic Distribution: Small Loans to Businesses**

Geographic Distribution: SMALL BUSINESS																Evaluation Period: 01/01/1998 TO 12/31/2000	
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 Business es	% Bank Loans	% of Business es	% Bank Loans	% of Business es	% Bank Loans	% of Business es	% Bank Loans		Overa ll	Low	Mod	Mid	Upp	#	% of Total**	
<b>Full Scope</b>																	
Los Angeles-Long Beach MSA	8.95	8.68	18.85	14.47	33.49	30.16	38.39	46.46	11	1.84	1.91	1.67	1.81	1.93	7,151	20.55	
Oakland MSA	11.55	14.00	15.58	13.80	44.42	35.83	27.94	35.28	11	1.57	2.73	1.40	1.38	1.61	1,471	4.23	
Orange County MSA	4.28	3.54	27.32	25.85	39.12	37.74	24.50	27.75	6	3.65	3.39	4.19	3.57	3.35	4,998	14.36	
San Diego MSA	3.73	3.51	23.40	22.53	44.31	43.09	28.37	30.80	4	7.89	10.63	9.47	8.10	6.77	9,295	26.71	
San Francisco MSA	14.81	20.26	19.18	21.49	37.79	28.36	28.09	29.89	9	2.10	4.09	2.30	1.47	2.13	1,964	5.64	
San Jose MSA	6.19	5.10	23.12	24.62	51.93	52.83	18.54	17.21	10	1.93	1.56	2.20	2.00	1.59	1,255	3.61	
<b>Limited Scope</b>																	

\* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.

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

Bakersfield MSA	8.64	7.34	24.71	16.21	27.39	14.98	39.26	61.47	6	4.50	3.79	3.72	3.07	5.84	654	1.88
Fresno MSA	4.93	4.22	23.37	21.19	43.69	34.67	27.93	39.87	5	7.81	12.35	7.39	6.83	8.99	1,826	5.25
Merced MSA	0.00	0.00	25.21	16.67	62.71	53.33	12.08	30.00	16	0.58	0.00	0.37	0.33	2.30	30	0.09
Modesto MSA	1.14	4.05	22.57	18.02	57.60	55.86	18.60	22.07	14	1.83	10.00	1.70	1.83	1.77	222	0.64
Redding MSA	0.00	0.00	17.28	12.89	70.87	73.75	11.85	13.37	7	6.42	0.00	8.09	5.94	8.39	419	1.20
Riverside-San Bernardino MSA	2.04	0.33	23.55	16.76	48.52	52.68	25.81	30.23	9	2.46	1.29	2.79	2.75	2.08	2,124	6.10
Sacramento MSA	5.09	3.97	21.06	16.80	47.92	54.56	25.93	24.66	11	1.90	1.89	2.31	2.12	1.51	1,107	3.18
Salinas MSA	7.79	16.33	19.40	12.24	40.02	44.90	32.80	26.53	17	0.41	0.45	0.58	0.44	0.33	49	0.14
San Luis Obispo... MSA	0.00	0.00	11.54	4.81	77.14	86.54	11.32	8.65	12	1.63	0.00	0.37	1.79	1.93	104	0.30
Santa Barbara... MSA	0.57	0.00	44.63	28.57	29.70	48.77	25.10	22.66	14	1.14	0.00	0.73	1.95	0.96	203	0.58
Stockton-Lodi MSA	7.57	6.58	22.90	21.32	42.92	41.32	26.60	30.79	11	2.60	6.36	2.55	2.00	3.00	380	1.09
Vallejo-Fairfield-Napa MSA	3.14	1.80	15.98	15.32	62.53	62.16	18.35	20.72	15	0.73	0.00	0.17	1.10	0.24	111	0.32
Visalia-Tulare-Porterville MSA	0.00	0.00	18.73	14.89	49.40	51.46	31.83	33.66	6	6.54	0.00	3.92	7.06	7.52	618	1.78
Yolo MSA	0.38	0.00	37.88	25.00	43.14	40.00	18.60	35.00	10	2.16	0.00	2.13	1.78	3.09	100	0.29
Yuba City MSA	0.00	0.00	26.14	18.18	53.59	40.91	20.27	40.91	12	2.19	0.00	3.43	2.26	1.58	66	0.19
Non-MSA Assessment Areas	0.28	0.00	31.14	36.42	47.35	33.38	21.22	30.20	4	8.40	0.00	10.55	6.41	10.71	659	1.89

**Table 6. Geographic Distribution: Small Loans to Farms**

Geographic Distribution: SMALL FARM		Evaluation Period: 01/01/1998 TO 12/31/2000														
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overa II	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
Los Angeles-Long Beach MSA	2.54	0.00	11.55	42.86	37.16	0.00	48.55	57.14	0	0.00	0.00	0.00	0.00	0.00	7	0.76
Oakland MSA	5.26	0.00	11.36	0.00	45.22	0.00	38.02	100.00	0	0.00	0.00	0.00	0.00	0.00	1	0.11
Orange County MSA	3.16	0.00	23.57	50.00	42.41	50.00	29.47	0.00	10	1.15	0.00	0.00	2.56	0.00	8	0.87
San Diego MSA	0.94	0.00	16.33	29.41	47.26	41.18	35.47	29.41	0	0.00	0.00	0.00	0.00	0.00	17	1.84
San Francisco MSA	3.15	0.00	18.57	0.00	42.84	50.00	35.18	50.00	17	1.32	0.00	0.00	0.00	2.33	2	0.22
San Jose MSA	4.11	0.00	22.62	0.00	52.96	66.67	20.31	33.33	0	0.00	0.00	0.00	0.00	0.00	3	0.33
<b>Limited Scope</b>																

\* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.

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

Bakersfield MSA	0.53	5.13	35.73	25.64	28.45	15.38	35.29	53.85	6	5.45	100.0 0	3.75	4.55	7.25	39	4.23
Fresno MSA	0.43	0.00	17.70	31.90	61.44	41.38	20.40	26.72	8	5.92	0.00	16.67	2.94	6.58	116	12.57
Merced MSA	0.10	0.00	9.52	3.37	83.28	87.64	7.09	8.99	5	6.32	0.00	7.14	6.59	0.00	89	9.64
Modesto MSA	0.24	0.37	8.01	9.26	59.19	41.11	32.56	49.26	1	25.63	100.0 0	25.81	16.75	42.27	270	29.25
Redding MSA	0.00	0.00	6.70	5.26	77.32	89.47	15.98	5.26	0	0.00	0.00	0.00	0.00	0.00	19	2.06
Riverside-San Bernardino MSA	3.21	0.00	20.19	22.22	42.16	0.00	34.43	77.78	8	1.95	0.00	0.00	0.00	4.62	9	0.98
Sacramento MSA	1.70	0.00	10.42	0.00	60.81	100.00	27.06	0.00	7	4.96	0.00	0.00	7.53	0.00	14	1.52
Salinas MSA	8.38	3.85	19.95	15.38	46.14	80.77	25.53	0.00	4	7.81	0.00	0.00	13.89	0.00	26	2.82
San Luis Obispo... MSA	0.00	0.00	7.31	0.00	83.67	0.00	9.02	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
Santa Barbara... MSA	0.00	0.00	26.18	0.00	28.93	40.00	44.90	60.00	0	0.00	0.00	0.00	0.00	0.00	5	0.54
Stockton-Lodi MSA	0.96	0.00	9.79	8.57	62.74	75.24	26.51	16.19	4	8.04	0.00	7.89	9.13	6.72	105	11.38
Vallejo-Fairfield-Napa MSA	0.70	0.00	5.14	0.00	63.20	100.00	30.96	0.00	16	0.72	0.00	0.00	0.93	0.00	3	0.33
Visalia-Tulare-Porterville MSA	0.00	0.00	24.65	11.90	62.46	54.76	12.89	33.33	10	2.41	0.00	1.25	1.15	11.76	42	4.55
Yolo MSA	0.20	0.00	21.61	27.27	63.26	63.64	14.93	9.09	9	2.10	0.00	2.63	1.76	3.70	22	2.38
Yuba City MSA	0.00	0.00	17.47	11.43	55.91	48.57	26.62	40.00	4	5.81	0.00	5.56	4.41	8.70	70	7.58
Non-MSA Assessment Area	0.88	0.00	20.97	14.29	47.70	60.71	30.44	25.00	6	5.08	0.00	3.85	7.14	2.44	56	6.08

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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 Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***
<b>Full Scope</b>																
Los Angeles-Long Beach MSA	22.82	1.92	16.85	10.98	19.70	5.92	40.63	60.63	146	0.07	0.05	0.11	0.03	0.12	574	11.57
Oakland MSA	20.34	2.08	17.35	15.63	23.48	6.94	38.83	38.54	122	0.06	0.08	0.10	0.04	0.09	288	5.80
Orange County MSA	18.65	3.88	19.00	17.05	23.57	11.43	38.77	51.55	92	0.18	0.25	0.29	0.09	0.27	516	10.40
San Diego MSA	19.87	8.19	18.72	23.22	22.32	11.36	39.09	45.03	51	0.43	2.71	1.45	0.29	0.32	1,197	24.12
San Francisco MSA	19.83	0.85	18.18	4.26	22.65	3.69	39.34	72.73	61	0.26	0.31	0.13	0.05	0.43	352	7.09
San Jose MSA	18.71	3.09	18.69	12.71	23.99	8.59	38.61	28.87	92	0.11	0.32	0.19	0.09	0.14	291	5.86
<b>Limited Scope</b>																

\* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Bakersfield MSA	22.38	8.43	17.15	19.28	20.18	16.87	40.29	45.78	81	0.11	0.10	0.09	0.02	0.26	83	1.67
Fresno MSA	23.02	15.75	16.93	27.56	19.78	13.39	40.27	39.37	52	0.33	1.58	0.53	0.16	0.30	127	2.56
Merced MSA	20.72	25.00	18.73	0.00	20.00	25.00	40.54	50.00	124	0.05	0.88	0.00	0.00	0.07	4	0.08
Modesto MSA	20.97	7.14	17.19	21.43	21.42	35.71	40.42	35.71	117	0.06	0.00	0.06	0.11	0.05	14	0.28
Redding MSA	21.65	7.69	17.74	7.69	20.87	0.00	39.73	69.23	80	0.08	0.00	0.00	0.00	0.22	13	0.26
Riverside-San Bernardino MSA	20.75	7.03	17.17	15.90	22.57	13.15	39.51	50.76	130	0.08	0.10	0.12	0.05	0.12	327	6.59
Sacramento MSA	20.17	35.06	18.02	46.25	23.02	4.37	38.79	9.28	49	0.45	3.93	1.20	0.07	0.08	733	14.77
Salinas MSA	18.65	7.21	18.28	49.55	23.94	22.52	39.13	14.41	37	0.56	3.06	2.80	0.70	0.24	111	2.24
San Luis Obispo... MSA	17.65	0.00	18.91	18.18	24.68	18.18	38.76	63.64	106	0.06	0.00	0.13	0.00	0.09	22	0.44
Santa Barbara... MSA	19.52	5.88	18.10	17.65	22.62	11.76	39.77	44.12	84	0.12	0.43	0.24	0.00	0.16	34	0.69
Stockton-Lodi MSA	21.84	4.41	17.32	25.00	21.40	20.59	39.44	45.59	84	0.16	0.39	0.26	0.17	0.18	68	1.37
Vallejo-Fairfield-Napa MSA	17.94	5.41	17.89	13.51	25.91	21.62	38.27	43.24	138	0.05	0.00	0.00	0.10	0.05	37	0.75
Visalia-Tulare-Porterville MSA	21.64	1.85	18.12	27.78	19.54	27.78	40.70	42.59	44	0.30	0.00	0.18	0.49	0.38	54	1.09
Yolo MSA	21.22	33.33	18.13	43.59	20.86	7.69	39.79	10.26	45	0.33	3.49	0.80	0.00	0.13	39	0.79
Yuba City MSA	20.32	0.00	18.62	50.00	20.11	0.00	40.94	50.00	0	0.00	0.00	0.00	0.00	0.00	2	0.04
Non-MSA Assessment Areas	22.05	3.95	18.20	14.47	20.76	17.11	38.98	57.89	63	0.26	0.00	0.58	0.63	0.19	76	1.52

**Table 8. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT																
Evaluation Period: 01/01/1998 TO 12/31/2000																
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*		Overa ll	Low	Mod	Mid	Upp	#	% of Total***
<b>Full Scope</b>																
Los Angeles-Long Beach MSA	22.82	0.00	16.85	0.00	19.70	0.00	40.63	0.00	149	0.02	0.00	0.00	0.00	0.00	14	12.50
Oakland MSA	20.34	0.00	17.35	0.00	23.48	0.00	38.83	0.00	112	0.03	0.00	0.00	0.00	0.00	8	7.14
Orange County MSA	18.65	0.00	19.00	0.00	23.57	0.00	38.77	0.00	120	0.03	0.00	0.00	0.00	0.00	11	9.82
San Diego MSA	19.87	0.00	18.72	0.00	22.32	0.00	39.09	0.00	69	0.10	0.00	0.00	0.00	0.00	24	21.43
San Francisco MSA	19.83	0.00	18.18	0.00	22.65	0.00	39.34	0.00	0	0.00	0.00	0.00	0.00	0.00	1	0.89
San Jose MSA	18.71	0.00	18.69	0.00	23.99	0.00	38.61	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
<b>Limited Scope</b>																

\* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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



Bakersfield MSA	22.38	0.00	17.15	0.00	20.18	0.00	40.29	0.00	52	0.13	0.00	0.00	0.00	0.00	6	5.36
Fresno MSA	23.02	0.00	16.93	0.00	19.78	0.00	40.27	0.00	69	0.06	0.00	0.00	0.00	0.00	7	6.25
Merced MSA	20.72	0.00	18.73	0.00	20.00	0.00	40.54	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
Modesto MSA	20.97	0.00	17.19	0.00	21.42	0.00	40.42	0.00	0	0.00	0.00	0.00	0.00	0.00	1	0.89
Redding MSA	21.65	0.00	17.74	0.00	20.87	0.00	39.73	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
Riverside-San Bernardino MSA	20.75	0.00	17.17	0.00	22.57	0.00	39.51	4.17	105	0.03	0.00	0.00	0.00	0.02	24	21.43
Sacramento MSA	20.17	0.00	18.02	0.00	23.02	0.00	38.79	0.00	119	0.02	0.00	0.00	0.00	0.00	4	3.57
Salinas MSA	18.65	0.00	18.28	0.00	23.94	0.00	39.13	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
San Luis Obispo... MSA	17.65	0.00	18.91	0.00	24.68	0.00	38.76	0.00	60	0.29	0.00	0.00	0.00	0.00	1	0.89
Santa Barbara... MSA	19.52	0.00	18.10	0.00	22.62	0.00	39.77	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
Stockton-Lodi MSA	21.84	0.00	17.32	0.00	21.40	0.00	39.44	0.00	70	0.06	0.00	0.00	0.00	0.00	2	1.79
Vallejo-Fairfield-Napa MSA	17.94	0.00	17.89	0.00	25.91	0.00	38.27	0.00	0	0.00	0.00	0.00	0.00	0.00	1	0.89
Visalia-Tulare-Porterville MSA	21.64	0.00	18.12	0.00	19.54	0.00	40.70	0.00	54	0.14	0.00	0.00	0.00	0.00	1	0.89
Yolo MSA	21.22	0.00	18.13	0.00	20.86	0.00	39.79	0.00	38	0.31	0.00	0.00	0.00	0.00	1	0.89
Yuba City MSA	20.32	0.00	18.62	0.00	20.11	0.00	40.94	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
Non-MSA Assessment Areas	22.05	0.00	18.20	0.00	20.76	0.00	38.98	0.00	44	0.26	0.00	0.00	0.00	0.00	6	5.35

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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 Mortgage Refinance Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overa ll	Low	Mod	Mid	Upp	#	% of Total***
<b>Full Scope</b>																
Los Angeles-Long Beach MSA	22.82	2.30	16.85	8.96	19.70	11.86	40.63	63.20	103	0.14	0.22	0.15	0.13	0.18	826	15.57
Oakland MSA	20.34	4.31	17.35	12.07	23.48	12.93	38.83	52.16	129	0.07	0.09	0.06	0.03	0.10	232	4.37
Orange County MSA	18.65	5.64	19.00	13.33	23.57	14.70	38.77	55.04	80	0.20	0.34	0.17	0.14	0.31	585	11.03
San Diego MSA	19.87	11.26	18.72	19.12	22.32	16.61	39.09	43.60	55	0.40	1.10	0.80	0.43	0.42	1,234	23.27
San Francisco MSA	19.83	3.64	18.18	7.62	22.65	10.60	39.34	66.56	75	0.19	0.36	0.10	0.10	0.29	302	5.69
San Jose MSA	18.71	5.41	18.69	21.62	23.99	23.65	38.61	39.53	110	0.09	0.16	0.11	0.10	0.12	296	5.58
<b>Limited Scope</b>																

\* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Bakersfield MSA	22.38	12.36	17.15	24.72	20.18	22.47	40.29	35.96	42	0.62	2.31	2.13	0.63	0.54	178	3.36
Fresno MSA	23.02	8.66	16.93	20.08	19.78	18.90	40.27	50.79	32	0.84	1.86	2.12	0.97	1.05	254	4.79
Merced MSA	20.72	0.00	18.73	18.18	20.00	9.09	40.54	63.64	100	0.16	0.00	0.00	0.00	0.38	11	0.21
Modesto MSA	20.97	11.11	17.19	7.41	21.42	11.11	40.42	59.26	96	0.18	0.71	0.14	0.16	0.26	27	0.51
Redding MSA	21.65	0.00	17.74	2.94	20.87	5.88	39.73	79.41	51	0.41	0.00	0.00	0.17	0.80	34	0.64
Riverside-San Bernardino MSA	20.75	11.74	17.17	15.96	22.57	20.89	39.51	43.43	102	0.20	0.61	0.35	0.27	0.24	426	8.03
Sacramento MSA	20.17	11.65	18.02	18.88	23.02	18.07	38.79	46.99	106	0.14	0.46	0.23	0.17	0.15	249	4.69
Salinas MSA	18.65	11.11	18.28	26.67	23.94	28.89	39.13	31.11	70	0.22	0.47	0.56	0.42	0.17	45	0.85
San Luis Obispo... MSA	17.65	2.94	18.91	5.88	24.68	20.59	38.76	67.65	66	0.22	0.55	0.15	0.17	0.30	34	0.64
Santa Barbara... MSA	19.52	5.08	18.10	10.17	22.62	22.03	39.77	57.63	83	0.14	0.00	0.00	0.19	0.21	59	1.11
Stockton-Lodi MSA	21.84	6.90	17.32	19.83	21.40	19.83	39.44	47.41	67	0.36	1.04	0.69	0.67	0.32	116	2.19
Vallejo-Fairfield-Napa MSA	17.94	0.00	17.89	0.00	25.91	21.74	38.27	69.57	139	0.07	0.00	0.00	0.12	0.11	23	0.43
Visalia-Tulare-Porterville MSA	21.64	8.70	18.12	22.36	19.54	21.12	40.70	45.34	28	0.96	1.32	2.33	1.04	1.14	161	3.04
Yolo MSA	21.22	11.43	18.13	11.43	20.86	14.29	39.79	54.29	78	0.22	0.00	0.57	0.16	0.26	35	0.66
Yuba City MSA	20.32	9.09	18.62	0.00	20.11	27.27	40.94	54.55	80	0.16	0.00	0.00	0.00	0.21	11	0.21
Non-MSA Assessment Areas	22.05	1.20	18.20	16.27	20.76	22.89	38.98	53.61	31	0.82	0.00	1.99	1.23	0.88	166	3.12

**Table 10. Borrower Distribution: Small Loans to Businesses**

Borrower Distribution: SMALL BUSINESS		Evaluation Period: 01/01/1998 TO 12/31/2000							
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 Loans to Businesses
	% Business**	% Bank Loans***	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****
<b>Full Scope</b>									
Los Angeles-Long Beach MSA	84.52	48.71	81.39	8.30	10.31	1.84	1.78	7,151	20.55
Oakland MSA	85.60	47.79	71.69	14.87	13.44	1.57	1.56	1,471	4.23
Orange County MSA	83.45	47.14	85.37	7.62	7.02	3.65	3.53	4,998	14.36
San Diego MSA	85.71	51.61	89.59	5.03	5.37	7.89	8.14	9,295	26.71
San Francisco MSA	85.41	46.69	65.72	16.03	18.25	2.10	1.90	1,964	5.64
San Jose MSA	84.20	48.37	75.58	10.92	13.50	1.93	1.93	1,255	3.61
<b>Limited Scope</b>									

\* The market consists of all other Small Business reporters in UBOC's assessment area and is based on 1999 Aggregate Small Business Data only

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

\*\*\* 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 19% of small loans to businesses originated and purchased by the bank.

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

Bakersfield MSA	88.09	50.00	85.04	8.79	6.18	4.50	4.77	654	1.88
Fresno MSA	88.18	56.90	92.17	4.51	3.31	7.81	8.85	1,826	5.25
Merced MSA	88.01	66.67	100.00	0.00	0.00	0.58	0.66	30	0.09
Modesto MSA	85.18	54.05	78.06	13.55	8.39	1.83	2.07	222	0.64
Redding MSA	86.66	58.47	59.66	22.75	17.60	6.42	6.52	419	1.20
Riverside-San Bernardino MSA	86.08	44.77	84.97	6.41	8.62	2.46	2.39	2,124	6.10
Sacramento MSA	86.66	48.96	77.71	12.00	10.29	1.90	2.02	1,107	3.18
Salinas MSA	88.70	57.14	85.71	5.71	8.57	0.41	0.43	49	0.14
San Luis Obispo... MSA	89.19	55.77	89.16	0.00	10.84	1.63	1.60	104	0.30
Santa Barbara... MSA	87.16	67.49	89.13	4.35	6.52	1.14	1.53	203	0.58
Stockton-Lodi MSA	86.57	54.21	76.33	13.47	10.20	2.60	3.24	380	1.09
Vallejo-Fairfield-Napa MSA	87.35	57.66	73.33	9.33	17.33	0.73	0.85	111	0.32
Visalia-Tulare-Porterville MSA	86.51	64.40	91.98	3.79	4.23	6.54	7.53	618	1.78
Yolo MSA	86.52	55.00	83.33	4.17	12.50	2.16	2.99	100	0.29
Yuba City MSA	89.31	53.03	84.44	13.33	2.22	2.19	1.90	66	0.19
Non-MSA Assessment Area	87.63	54.48	94.43	5.38	1.20	8.40	9.20	659	1.89

**Table 11. Borrower Distribution: Small Loans to Farms**

Borrower Distribution: SMALL FARM		Evaluation Period: 01/01/1998 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$ 1million 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	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****
<b>Full Scope</b>									
Los Angeles-Long Beach MSA	92.15	42.86	100.00	0.00	0.00	0.00	0.00	7	0.76
Oakland MSA	92.04	100.00	0.00	0.00	0.00	0.00	0.00	1	0.11
Orange County MSA	89.00	25.00	37.50	12.50	50.00	1.15	0.00	8	0.87
San Diego MSA	89.69	82.35	88.24	11.76	0.00	0.00	0.00	17	1.84
San Francisco MSA	92.16	50.00	0.00	50.00	50.00	1.32	0.00	2	0.22
San Jose MSA	91.00	100.00	100.00	0.00	0.00	0.00	0.00	3	0.33
<b>Limited Scope</b>									
Bakersfield MSA	83.14	66.67	26.32	31.58	42.11	5.45	4.80	39	4.23
Fresno MSA	88.08	62.07	50.75	17.91	31.34	5.92	5.65	116	12.57
Merced MSA	87.23	70.79	51.85	33.33	14.81	6.32	6.49	89	9.64
Modesto MSA	90.69	80.00	38.78	39.46	21.77	25.63	27.19	270	29.25
Redding MSA	87.63	78.95	25.00	75.00	0.00	0.00	0.00	19	2.06
Riverside-San Bernardino MSA	87.45	77.78	50.00	33.33	16.67	1.95	2.86	9	0.98
Sacramento MSA	92.73	57.14	23.08	38.46	38.46	4.96	4.46	14	1.52
Salinas MSA	75.80	30.77	44.44	22.22	33.33	7.81	3.23	26	2.82
San Luis Obispo... MSA	90.36	0.00	0.00	0.00	0.00	0.00	0.00	0	0.00
Santa Barbara... MSA	85.99	60.00	80.00	20.00	0.00	0.00	0.00	5	0.54
Stockton-Lodi MSA	88.36	65.71	30.51	44.07	25.42	8.04	7.17	105	11.38
Vallejo-Fairfield-Napa MSA	89.72	100.00	50.00	0.00	50.00	0.72	0.96	3	0.33
Visalia-Tulare-Porterville MSA	87.39	69.05	65.38	23.08	11.54	2.41	3.14	42	4.55
Yolo MSA	85.07	90.91	16.67	25.00	58.33	2.10	2.51	22	2.38
Yuba City MSA	89.68	82.86	14.29	35.71	50.00	5.81	5.34	70	7.58
Non-MSA Assessment Areas	82.21	50.00	37.50	40.63	21.88	5.08	4.08	56	6.08

\* The market consists of all other Small Farm reporters in Bank's assessment area and is based on 1999 Aggregate Small Business Data only

\*\* Farms with revenues of \$1 million or less as a percentage of all farms.

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

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

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		Evaluation Period: 01/01/1998 TO 3/31/2001							
!Undefined Bookmark, TOTAL	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
MSA/Assessment Area									
<b>Full Scope</b>									
Los Angeles-Long Beach MSA	13	4,486	419	44,617	432	49,110	17.43	28	13,181
Oakland MSA	12	1,974	82	21,616	94	23,590	8.87	16	18,004
Orange County MSA	0	0	65	28,997	65	28,997	10.91	3	7,442
San Diego MSA	3	740	153	24,080	156	24,820	9.34	12	5,725
San Francisco MSA	7	765	148	29,724	155	30,489	11.47	25	11,432
San Jose MSA	4	177	51	33,014	55	33,191	12.48	13	17,651
<b>Limited Scope</b>									

\* '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".

Bakersfield MSA	1	40	51	11,428	52	11,468	4.31	7	2,361
Fresno MSA	1	71	19	2,737	20	2,808	1.06	1	202
Merced MSA	1	3	1	241	2	244	0.09	1	17
Modesto MSA	1	13	2	1,010	3	1,023	0.38	1	76
Redding MSA	1	11	5	899	6	910	0.34	1	121
Riverside-San Bernardino MSA	1	79	46	28,432	47	28,511	10.73	8	13,001
Sacramento MSA	1	45	53	9,670	54	9,715	3.65	7	3,389
Salinas MSA	1	6	3	4,043	4	4,049	1.52	4	566
San Luis Obispo... MSA	1	4	4	1,325	5	1,329	0.50	3	410
Santa Barbara... MSA	1	7	4	578	5	585	0.22	1	43
Stockton-Lodi MSA	1	16	3	663	4	679	0.26	2	1,072
Vallejo-Fairfield-Napa MSA	1	6	11	11,120	14	11,126	4.19	7	7,759
Visalia-Tulare-Porterville MSA	2	73	12	1,089	14	1,162	0.44	3	866
Yolo MSA	1	4	5	3,086	6	3,090	1.16	2	251
Yuba City MSA	1	4	1	367	2	371	0.14	1	27
Non-MSA Assessment Area	1	20	5	1,298	6	1,318	0.50	2	99

**Table13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Evaluation Period: 01/01/1998 TO 3/31/2001			
MSA/Assessment Area	Deposits % of Rated Area Deposits in MSA/AA	Branches						Branch Openings/Closings						Population			
		# of Bank Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net change in Location of Branches (+ or -)				% of the Population with Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Scope</b>																	

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



Los Angeles-Long Beach MSA	37.55	40	16.46	2.50	5.00	30.00	62.50	1	3	0	0	-1	+3	9.02	26.69	33.93	30.17
Oakland MSA	2.52	11	4.52	9.09	36.36	36.36	18.18	0	0	0	0	0	0	8.58	20.10	43.13	27.70
Orange County MSA	7.85	33	13.58	3.03	18.18	42.42	36.36	0	2	0	0	+1	+1	3.61	26.73	42.01	27.64
San Diego MSA	13.00	55	22.63	3.64	36.36	40.00	20.00	1	2	+1	+1	0	-1	6.24	23.15	43.98	25.26
San Francisco MSA	23.49	11	4.53	18.18	18.18	27.27	36.36	0	1	0	0	0	+1	6.52	20.53	44.94	27.91
San Jose MSA	5.14	10	4.12	0.00	30.00	70.00	0.00	1	0	0	-1	0	0	3.91	21.23	54.69	20.18
Limited Scope:																	
Bakersfield MSA	0.89	7	2.88	0.00	28.57	0.00	71.43	0	0	0	0	0	0	3.46	31.76	32.34	31.41
Fresno MSA	1.54	17	6.58	0.00	18.75	37.50	43.75	0	1	0	0	0	+1	4.84	26.69	45.19	23.14
Merced MSA	0.01	1	0.41	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.06	18.06	69.42	12.46
Modesto MSA	0.19	3	1.23	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.80	19.56	57.51	22.08
Redding MSA	0.13	1	0.41	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	12.71	73.35	13.94
Riverside-San Bernardino MSA	2.75	22	8.23	0.00	20.00	40.00	40.00	0	0	0	0	0	0	2.01	21.93	48.82	26.72
Sacramento MSA	1.57	7	2.88	0.00	14.29	85.71	0.00	0	0	0	0	0	0	5.14	17.45	51.69	25.72
Salinas MSA	0.17	1	0.41	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.77	28.89	46.87	23.47
San Luis Obispo...MSA	0.23	2	0.82	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	9.53	80.98	9.46
Santa Barbara... MSA	0.37	3	1.23	0.00	33.33	66.67	0.00	0	0	0	0	0	0	1.54	33.12	34.45	30.89
Stockton-Lodi MSA	0.30	6	2.47	16.67	0.00	50.00	33.33	0	1	0	0	+1	0	2.84	27.49	44.03	25.64
Vallejo-Fairfield-Napa MSA	0.08	1	0.41	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.33	15.40	59.73	24.46
Visalia-Tulare-Porterville MSA	0.64	5	2.06	0.00	40.00	0.00	60.00	0	0	0	0	0	0	0.00	27.66	47.35	24.72
Yolo MSA	0.13	1	0.41	0.00	0.00	100.00	0.00	0	0	0	0	0	0	3.68	27.44	34.91	33.97
Yuba City MSA	0.10	1	0.41	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	30.44	48.57	20.99
Non-MSA Assessment Areas	1.22	9	3.28	0	0	0	0	0	0	0	0	0	0	0.97	34.12	42.68	22.22

**Washington Tables**

**Table 1. Lending Volume**

LENDING VOLUME												Evaluation Period: 01/01/1998 TO 12/31/2000	
MSA/Assessment Area	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans (#) in AA	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)		
<b>Full Scope</b>													
Seattle-Bellevue-Everett MSA	70.41	96	34,682	335	83,812	10	2,619	2	1,057	443	122,170	74.58	
<b>Limited Scope</b>													
Chelan County AA	7.11	4	713	46	13,009	26	5,701	0	0	76	19,423	12.79	
Tacoma MSA	22.49	13	3,459	58	7,295	0	0	4	290	75	11,044	12.63	

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE																	Evaluation Period: 01/01/1998 TO 12/31/2000	
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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**		
<b>Full Scope</b>																		
Seattle-Bellevue-Everett MSA	0.58	0.00	11.79	10.17	65.01	35.59	22.62	54.24	263	0.01	0.00	0.01	0.00	0.01	59	92.19		
<b>Limited Scope</b>																		
Chelan County AA	0.00	0.00	6.76	0.00	70.65	0.00	22.58	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00		
Tacoma MSA	1.42	0.00	9.00	0.00	61.49	40.00	28.09	60.00	0	0.00	0.00	0.00	0.00	0.00	5	7.81		

Table 1 \* Deposit Data as of June 30, 2000

Table 2 \* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

\*\* Home purchase loans within an MSA/AA as a percentage of all home purchase loans originated and purchased in the rating area.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1998 TO 12/31/2000						
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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
Seattle-Bellevue-Everett MSA	0.58	0.00	11.79	0.00	65.01	0.00	22.62	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
<b>Limited Scope</b>																
Chelan County AA	0.00	0.00	6.76	0.00	70.65	0.00	22.58	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
Tacoma MSA	1.42	0.00	9.00	0.00	61.49	100.00	28.09	0.00	0	0.00	0.00	0.00	0.00	0.00	1	100.00

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
Seattle-Bellevue-Everett MSA	0.58	0.00	11.79	5.56	65.01	38.89	22.62	55.56	213	0.02	0.00	0.03	0.01	0.05	36	76.60
<b>Limited Scope</b>																
Chelan County AA	0.00	0.00	6.76	0.00	70.65	25.00	22.58	75.00	80	0.10	0.00	0.00	0.00	0.43	4	8.51
Tacoma MSA	1.42	0.00	9.00	0.00	61.49	71.43	28.09	28.57	287	0.01	0.00	0.00	0.00	0.02	7	14.89

Table 3 \* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

\*\* Home improvement loans within an MSA/AA as a percentage of all home improvement loans originated and purchased in the rating area.

Table 4 \* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

\*\* Home mortgage refinance loans within an MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rating area.



**Table 5. Geographic Distribution: Small Loans to Businesses**

Geographic Distribution: SMALL BUSINESS										Evaluation Period: 01/01/1998 TO 12/31/2000						
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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
Seattle-Bellevue-Everett MSA	2.75	4.78	21.15	13.43	55.71	36.72	20.39	45.07	20	0.41	0.74	0.24	0.31	0.79	335	76.31
<b>Limited Scope</b>																
Chelan County AA	0.00	0.00	11.37	0.00	72.80	47.83	15.83	52.17	13	0.95	0.00	0.00	0.68	2.49	46	10.48
Tacoma MSA	8.93	36.21	12.56	5.17	54.17	37.93	24.33	20.69	22	0.19	0.60	0.11	0.17	0.14	58	13.21

**Table 6. Geographic Distribution: Small Loans to Farms**

Geographic Distribution: SMALL FARM										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overa ll	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
Seattle-Bellevue-Everett MSA	1.23	0.00	13.20	0.00	67.22	0.00	18.35	100.00	10	1.62	0.00	0.00	0.00	6.82	10	27.78
<b>Limited Scope</b>																
Chelan County AA	0.00	0.00	3.21	0.00	83.02	42.31	13.77	57.69	6	8.02	0.00	0.00	4.80	21.21	26	72.22
Tacoma MSA	2.24	0.00	6.73	0.00	65.58	0.00	25.45	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00

Table 5 \* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.  
 \*\* Small loans to businesses originated and purchased within an MSA/AA as a percentage of all small loans to businesses originated and purchased in the rating area.  
 Table 6 \* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.  
 \*\* Small Farm loans originated and purchased within an MSA/AA as a percentage of all Small Farm loans originated and purchased in the rating area.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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 Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overa ll	Low	Mod	Mid	Upp	#	% of Total***
<b>Full Scope</b>																
Seattle-Bellevue-Everett MSA	16.70	0.00	18.94	3.39	26.92	5.08	37.44	27.12	263	0.01	0.00	0.01	0.00	0.01	59	92.19
<b>Limited Scope</b>																
Chelan County AA	19.25	0.00	18.41	0.00	22.09	0.00	40.25	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
Tacoma MSA	19.04	0.00	18.46	0.00	24.87	0.00	37.64	40.00	0	0.00	0.00	0.00	0.00	0.00	5	7.81

**Table 8. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1998 TO 12/31/2000						
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*		Overa ll	Low	Mod	Mid	Upp	#	% of Total***
<b>Full Scope</b>																
Seattle-Bellevue-Everett MSA	16.70	0.00	18.94	0.00	26.92	0.00	37.44	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
<b>Limited Scope</b>																

Table 7 \* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Table 8 \* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Chelan County AA	19.25	0.00	18.41	0.00	22.09	0.00	40.25	0.00	0	0.00	0.00	0.00	0.00	0	0.00
Tacoma MSA	19.04	0.00	18.46	0.00	24.87	0.00	37.64	0.00	0	0.00	0.00	0.00	0.00	1	100.00

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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 Mortgage Refinance Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overa II	Low	Mod	Mid	Upp	#	% of Total***
<b>Full Scope</b>																
Seattle-Bellevue-Everett MSA	16.70	0.00	18.94	5.56	26.92	8.33	37.44	69.44	213	0.02	0.00	0.00	0.02	0.05	36	76.60
<b>Limited Scope</b>																
Chelan County AA	19.25	0.00	18.41	0.00	22.09	25.00	40.25	75.00	80	0.10	0.00	0.00	0.00	0.20	4	8.51
Tacoma MSA	19.04	14.29	18.46	0.00	24.87	0.00	37.64	71.43	287	0.01	0.00	0.00	0.00	0.02	7	14.89

**Table 10. Borrower Distribution: Small Loans to Businesses**

Borrower Distribution: SMALL BUSINESS						Evaluation Period: 01/01/1998 TO 12/31/2000				
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 Loans to Businesses	
	% Business**	% Bank Loans***	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****	
<b>Full Scope</b>										
Seattle-Bellevue-Everett MSA	87.91	58.21	50.66	14.85	34.50	0.41	0.40	335	76.31	
<b>Limited Scope</b>										

Table 9 \* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Table 10 \* The market consists of all other Small Business reporters in UBOC's assessment area and is based on 1999 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 7% of small loans to businesses reported by the bank.

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



Chelan County AA	91.39	47.83	50.00	6.67	43.33	0.95	0.57	46	10.48
Tacoma MSA	90.03	48.28	76.47	11.76	11.76	0.19	0.20	58	13.21

**Table 11. Borrower Distribution: Small Loans to Farms**

Borrower Distribution: SMALL FARM		Evaluation Period: 01/01/1998 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$ 1million 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	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total
<b>Full Scope</b>									
Seattle-Bellevue-Everett MSA	95.90	50.00	0.00	66.67	33.33	1.62	0.72	10	27.78
<b>Limited Scope</b>									
Chelan County AA	92.08	80.77	23.81	38.10	38.10	8.02	7.95	26	72.22
Tacoma MSA	95.29	0.00	0.00	0.00	0.00	0.00	0.00	0	0.00

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		Evaluation Period: 01/01/1998 TO 3/31/2001							
MSA/Assessment Area	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Scope</b>									
Seattle-Bellevue-Everett MSA	0	0	8	77	8	77	78.57	0	0
<b>Limited Scope</b>									

Table 11 \* The market consists of all other Small Farm reporters in UBOC's assessment area and is based on 1999 Aggregate Small Business Data only

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms.

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

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

Table 12 \* '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".

Chelan County AA	0	0	0	0	0	0	0.00	0	0
Tacoma MSA	0	0	5	21	5	21	21.43	1	783

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Evaluation Period: 01/01/1998 TO 3/31/2001			
MSA/Assessment Area	Deposits % of Rated Area Deposits in MSA/AA	# of Bank Branches	% of Rated Area Branches in MSA/AA	Branches				Branch Openings/Closings				Population					
				Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net change in Location of Branches (+ or -)				% of the Population with Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Scope</b>																	
Seattle-Bellevue-Everett MSA	70.41	2	50.00	0.00	50.00	0.00	50.00	0	0	0	0	0	0	2.19	16.18	62.80	18.75
<b>Limited Scope</b>																	
Chelan County AA	7.11	1	25.00	0.00	0.00	100.00	0.00	0	1	0	0	+1	0	0.00	10.63	70.13	19.24
Tacoma MSA	22.49	1	25.00	100.00	0.00	0.00	0.00	0	0	0	0	0	0	4.66	16.05	56.15	23.10

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

**Oregon Tables**

**Table 1. Lending Volume**

LENDING VOLUME												Evaluation Period: 01/01/1998 TO 12/31/2000	
MSA/Assessment Area	% of Rated Area Deposits in MSA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans (#) in AA	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)		
<b>Full Scope</b>													
Portland-Vancouver MSA	86.41	97	20,741	387	115,077	0	0	14	3,326	498	139,144	83.28	
<b>Limited Scope</b>													
Eugene-Springfield MSA	13.59	6	962	93	24,367	1	8	0	0	100	25,337	16.72	

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE																	Evaluation Period: 01/01/1998 TO 12/31/2000	
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		Overa II	Low	Mod	Mid	Upp	#	% of Total**		
<b>Full Scope</b>																		
Portland-Vancouver MSA	0.87	0.00	13.89	11.11	58.54	40.00	26.71	48.89	178	0.02	0.00	0.07	0.01	0.01	45	95.74		
<b>Limited Scope</b>																		
Eugene-Springfield MSA	0.61	0.00	13.67	50.00	66.21	0.00	19.51	50.00	165	0.01	0.00	0.00	0.00	0.06	2	4.26		

Table 1 \* Deposit Data as of June 30, 1999

Table 2 \* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

\*\* Home purchase loans within an MSA/AA as a percentage of all home purchase loans originated and purchased in the rating area.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1998 TO 12/31/2000						
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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
Portland-Vancouver MSA	0.87	0.00	13.89	0.00	58.54	0.00	26.71		0	0.00	0.00	0.00	0.00	0.00	2	100.00
<b>Limited Scope</b>																
Eugene-Springfield MSA	0.61	0.00	13.67	0.00	66.21	0.00	19.51	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
Portland-Vancouver MSA	0.87	2.00	13.89	6.00	58.54	36.00	26.71	56.00	180	0.04	0.18	0.00	0.03	0.08	50	92.59
<b>Limited Scope</b>																
Eugene-Springfield MSA	0.61	0.00	13.67	0.00	66.21	50.00	19.51	50.00	209	0.01	0.00	0.00	0.02	0.00	4	7.41

Table 3 \* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.  
 \*\* Home improvement loans within an MSA/AA as a percentage of all home improvement loans originated and purchased in the rating area.  
 Table 4 \* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.  
 \*\* Refinance loans within an MSA/AA as a percentage of all refinance loans originated and purchased in the rating area.



**Table 5. Geographic Distribution: Small Loans to Businesses**

Geographic Distribution: SMALL BUSINESS										Evaluation Period: 01/01/1998 TO 12/31/2000						
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		Overa II	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
Portland-Vancouver MSA	1.66	2.07	20.54	28.17	57.03	45.99	20.75	23.77	18	0.61	0.98	0.83	0.57	0.56	387	80.63
<b>Limited Scope</b>																
Eugene-Springfield MSA	6.42	15.05	26.71	22.58	50.65	34.41	16.22	27.96	16	0.50	1.11	0.81	0.36	0.41	93	19.38

**Table 6. Geographic Distribution: Small Loans to Farms**

Geographic Distribution: SMALL FARM										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overa II	Low	Mod	Mid	Upp	#	% of Total**
<b>Full Scope</b>																
Portland-Vancouver MSA	0.18	0.00	8.69	0.00	68.89	0.00	22.20	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00
<b>Limited Scope</b>																
Eugene-Springfield MSA	0.66	0.00	10.80	0.00	77.41	100.00	11.13	0.00	0	0.00	0.00	0.00	0.00	0.00	1	100.00

Table 5 \* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.  
 \*\* Small loans to businesses within an MSA/AA as a percentage of all small loans to businesses originated and purchased in the rating area.  
 Table 6 \* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.  
 \*\* Small Farm loans within an MSA/AA as a percentage of all Small Farm loans originated and purchased in the rating area.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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 Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overa ll	Low	Mod	Mid	Upp	#	% of Total***
<b>Full Scope</b>																
Portland-Vancouver MSA	17.20	2.22	18.44	15.56	25.45	4.44	38.91	33.33	178	0.02	0.00	0.06	0.01	0.01	45	95.74
<b>Limited Scope</b>																
Eugene-Springfield MSA	19.15	0.00	18.55	0.00	24.03	100.00	38.27	0.00	165	0.01	0.00	0.00	0.05	0.00	2	4.26

**Table 8. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1998 TO 12/31/2000						
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*		Overa ll	Low	Mod	Mid	Upp	#	% of Total***
<b>Full Scope</b>																
Portland-Vancouver MSA	17.20	0.00	18.44	0.00	25.45	0.00	38.91	0.00	0	0.00	0.00	0.00	0.00	0.00	2	100.00
<b>Limited Scope</b>																
Eugene-Springfield MSA	19.15	0.00	18.55	0.00	24.03	0.00	38.27	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0.00

Table 7 \* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Table 8 \* Based on 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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





**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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 Mortgage Refinance Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overa ll	Low	Mod	Mid	Upp	#	% of Total***
<b>Full Scope</b>																
Portland-Vancouver MSA	17.20	2.00	18.44	4.00	25.45	16.00	38.91	64.00	180	0.04	0.00	0.04	0.02	0.08	50	92.59
<b>Limited Scope</b>																
Eugene-Springfield MSA	19.15	0.00	18.55	0.00	24.03	0.00	38.27	100.00	209	0.01	0.00	0.00	0.00	0.03	4	7.41

**Table 10. Borrower Distribution: Small Loans to Businesses**

Borrower Distribution: SMALL BUSINESS						Evaluation Period: 01/01/1998 TO 12/31/2000				
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 Loans to Businesses	
	% Business**	% Bank Loans***	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****	
<b>Full Scope</b>										
Portland-Vancouver MSA	87.21	35.66	44.27	18.58	37.15	0.61	0.44	387	80.63	
<b>Limited Scope</b>										

Table 9 \* Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.  
 \*\* As a percentage of loans with borrower income information available.  
 \*\*\* Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.  
 Table 10 \* The market consists of all other Small Business reporters in UBOC's assessment area and is based on 1999 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 4% of small loans to businesses reported by the bank.  
 \*\*\*\* Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Eugene-Springfield MSA	87.83	51.61	52.38	20.63	26.98	0.50	0.46	93	19.38
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**Table 11. Borrower Distribution: Small Loans to Farms**

Borrower Distribution: SMALL FARM		Evaluation Period: 01/01/1998 TO 12/31/2000							
MSA/Assessment Area	Businesses With Revenues of \$ 1million 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	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****
<b>Full Scope</b>									
Portland-Vancouver MSA	94.26	0.00	0.00	0.00	0.00	0.00	0.00	0	0.00
<b>Limited Scope</b>									
Eugene-Springfield MSA	94.85	100.00	0.00	0.00	0.00	0.00	0.00	1	100.00

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		Evaluation Period: 01/01/1998 TO 3/31/2001							
MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Scope</b>									
Portland-Vancouver MSA	0	0	21	107	21	107	100.00	6	3,554
<b>Limited Scope</b>									
Eugene-Springfield MSA	0	0	5	10	5	10	100.00	2	588

Table 11 \* The market consists of all other Small Farm reporters in UBOC's assessment area and is based on 1999 Aggregate Small Business Data only

\*\* Farms with revenues of \$1 million or less as a percentage of all farms.

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

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

Table 12 \* '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".

**Table13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Evaluation Period: 01/01/1998 TO 3/31/2001			
MSA/Assessment Area	Deposits % of Rated Area Deposits in MSA/AA	# of Bank Branches	% of Rated Area Branches in MSA/AA	Branches				Branch Openings/Closings				Population					
				Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net change in Location of Branches (+ or -)				% of the Population with Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Scope</b>																	
Portland-Vancouver MSA	86.41	1	50.00	0.00	100.00	0.00	0.00	0	0	0	0	0	0	2.19	16.18	62.80	18.75
<b>Limited Scope</b>																	
Eugene-Springfield MSA	13.59	1	50.00	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	0.00	0.00	0.00

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

### Territory of Guam Tables

**Table 1. Lending Volume**

LENDING VOLUME												Evaluation Period: 01/01/1998 TO 12/31/2000	
MSA/Assessment Area	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans (#) in AA	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Guam AA	100	0	0	113	5,911	0	0	0	0	113	5,911	100.00	

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE																	Evaluation Period: 01/01/1998 TO 12/31/2000	
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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**		
Guam AA	0.00	0.00	3.98	0.00	80.16	0.00	15.86	0.00	NA	NA	NA	NA	NA	NA	0	0.00		

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT																	Evaluation Period: 01/01/1998 TO 12/31/2000	
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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**		
Guam AA	0.00	0.00	3.98	0.00	80.16	0.00	15.86	0.00	NA	NA	NA	NA	NA	NA	0	0.00		

NA's Not available NM - Not meaningful

Table 1 \* Deposit Data as of June 30, 1999

Table 2 \* Market Rank and Market Share data not available.

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

Table 3 \* Market Rank and Market Share data not available.

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank <sup>+</sup>	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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**
Guam AA	0.00	0.00	3.98	0.00	80.16	0.00	15.86	0.00	NA	NA	NA	NA	NA	NA	0	0.00

**Table 5. Geographic Distribution: Small Loans to Businesses**

Geographic Distribution: SMALL BUSINESS										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank <sup>+</sup>	Market Share by Geography*					Total Small Business Loans	
	% of Business es	% Bank Loans	% of Business es	% Bank Loans	% of Business es	% Bank Loans	% of Business es	% Bank Loans		Overa ll	Low	Mod	Mid	Upp	#	% of Total**
Guam AA	NA	0.00	NA	49.56	NA	46.02	NA	4.42	5	5.47	NA	NA	NA	NA	113	100.00

**Table 6. Geographic Distribution: Small Loans to Farms**

Geographic Distribution: SMALL FARM										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank <sup>+</sup>	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overa ll	Low	Mod	Mid	Upp	#	% of Total**
Guam AA	NA	0.00	NA	0.00	NA	0.00	NA	0.00	0	0.00	NA	NA	NA	NA	0	0.00

NA's Not available NM - Not meaningful

Table 4 <sup>+</sup> Market Rank and Market Share data not available.

<sup>+</sup> Home mortgage refinance loans within an MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 5 <sup>+</sup> Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.

<sup>+</sup> Small loans to businesses originated and purchased within an MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 6 <sup>+</sup> Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.

<sup>+</sup> Small Farm loans within an MSA/AA as a percentage of all Small Farm loans in the rating area.





**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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 Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overa II	Low	Mod	Mid	Upp	#	% of Total***
Guam AA	18.34	0.00	19.68	0.00	16.40	0.00	41.57	0.00	NA	NA	NA	NA	NA	NA	0	0.00

**Table 8. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1998 TO 12/31/2000						
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*		Overa II	Low	Mod	Mid	Upp	#	% of Total***
Guam AA	18.34	0.00	19.68	0.00	16.40	0.00	41.57	0.00	NA	NA	NA	NA	NA	NA	0	0.00

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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 Mortgage Refinance Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overa II	Low	Mod	Mid	Upp	#	% of Total***

NA's Not available NM - Not meaningful

Table 7 \* Market Rank and Market Share data not available.

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

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

Table 8 \* Market Rank and Market Share data not available.

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

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

Table 9 \* Market Rank and Market Share data not available.

	% of Families	% Bank Loans**	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overa II	Low	Mod	Mid	Upp	#	% of Total***
Guam AA	18.34	0.00	19.68	0.00	16.40	0.00	41.57	0.00	NA	NA	NA	NA	NA	NA	0	0.00

**Table10. Borrower Distribution: Small Loans to Businesses**

Borrower Distribution: SMALL BUSINESS		Evaluation Period: 01/01/1998 TO 12/31/2000									
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 Loans to Businesses		
	% Business**	% Bank Loans***	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****		
Guam AA	NA	12.39	90.27	4.42	5.31	5.47	0.33	113	100.00		

**Table11. Borrower Distribution: Small Loans to Farms**

Borrower Distribution: SMALL FARM		Evaluation Period: 01/01/1998 TO 12/31/2000									
MSA/Assessment Area	Businesses With Revenues of \$ 1million 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	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****		
Guam AA	NA	0.00	0.00	0.00	0.00	0.00	0.00	0	0.00		

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		Evaluation Period: 01/01/1998 TO 3/31/2001									
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\*\* As a percentage of loans with borrower information available.

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

NA's Not available NM - Not meaningful

Table 10 \* The market consists of all other Small Business reporters in UBOC's assessment area and is based on 1999 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 11% of small loans to businesses reported by the bank.

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

Table 11 \* The market consists of all other Small Farm reporters in UBOC's assessment area and is based on 1999 Aggregate Small Business Data only

\*\* Farms with revenues of \$1 million or less as a percentage of all farms.

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

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

MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Guam AA	0	0	0	0	0	0	0.00	0	0

Table 12 \* '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".

**Table13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Evaluation Period: 01/01/1998 TO 3/31/2001			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of Bank Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net change in Location of Branches (+ or -)				% of the Population with Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Guam AA	100.00	2	100.00	0	50	50	0	0	0	0	0	0	0	0.00	16.44	70.54	11.45

NA's Not available NM - Not meaningful

Table 13 The percentage of the population in the MSA/AA that resides in these geographies.

**Commonwealth of the Northern Mariana Islands Tables**

**Table 1. Lending Volume**

LENDING VOLUME												Evaluation Period: 01/01/1998 TO 12/31/2000	
MSA/Assessment Area	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans (#) in AA	
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)		
Saipan AA	100.00	0	0	45	2,855	0	0	0	0	45	2,855	100.00	

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE																	Evaluation Period: 01/01/1998 TO 12/31/2000	
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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**		
Saipan AA	0.20	0.00	6.57	0.00	85.94	0.00	7.28	0.00	NA	NA	NA	NA	NA	NA	0	0.00		

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT																	Evaluation Period: 01/01/1998 TO 12/31/2000	
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		Overa ll	Low	Mod	Mid	Upp	#	% of Total**		
Saipan AA	0.20	0.00	6.57	0.00	85.94	0.00	7.28	0.00	NA	NA	NA	NA	NA	NA	0	0.00		

NA's Not available NM - Not meaningful

Table 1 \* Deposit Data as of June 30, 1999

Table 2 \*\* Market Rank and Market Share data not available.

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

Table 3 \*\* Market Rank and Market Share data not available.

\*\* Home improvement loans within an MSA/AA as a % of all home improvement loans originated and purchased in the rating area.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank <sup>+</sup>	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		Overa II	Low	Mod	Mid	Upp	#	% of Total**
Saipan AA	0.20	0.00	6.57	0.00	85.94	0.00	7.28	0.00	NA	NA	NA	NA	NA	NA	0	0.00

**Table 5. Geographic Distribution: Small Loans to Businesses**

Geographic Distribution: SMALL BUSINESS										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank <sup>+</sup>	Market Share by Geography*					Total Small Business Loans	
	% of Business es	% Bank Loans	% of Business es	% Bank Loans	% of Business es	% Bank Loans	% of Business es	% Bank Loans		Overa II	Low	Mod	Mid	Upp	#	% of Total**
Saipan AA	NA	0.00	NA	2.22	NA	97.78	NA	0.00	3	11.16	NA	NA	NA	NA	45	100.00

**Table 6. Geographic Distribution: Small Loans to Farms**

Geographic Distribution: SMALL FARM										Evaluation Period: 01/01/1998 TO 12/31/2000						
MSA/Assessment Area	Low Income Geographies		Moderate Income Geographies		Middle Income Geographies		Upper Income Geographies		Overall Market Rank <sup>+</sup>	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans	% of Farms	% Bank Loans		Overa II	Low	Mod	Mid	Upp	#	% of Total**
Saipan AA	NA	0.00	NA	0.00	NA	0.00	NA	0.00	0	0.00	NA	NA	NA	NA	0	0.00

NA's Not available NM - Not meaningful

Table 4 <sup>+</sup> Market Rank and Market Share data not available.

<sup>\*\*</sup> Refinance loans within an MSA/AA as a percentage of all refinance loans originated and purchased in the rated area.

Table 5 <sup>+</sup> Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.

<sup>\*\*</sup> Small loans to businesses within an MSA/AA as a percentage of all Small Business loans originated and purchased in the rating area.

Table 6 <sup>+</sup> Based on 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.

<sup>\*\*</sup> Small Farm loans within an MSA/AA as a % of all Small Farm loans originated and purchased in the rating area.



**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HMDA HOME PURCHASE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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 Purchase Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overa II	Low	Mod	Mid	Upp	#	% of Total***
Saipan AA	24.00	0.00	16.30	0.00	17.55	0.00	42.24	0.00	NA	NA	NA	NA	NA	NA	0	0.00

**Table 8. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT										Evaluation Period: 01/01/1998 TO 12/31/2000						
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*		Overa II	Low	Mod	Mid	Upp	#	% of Total***
Saipan AA	24.00	0.00	16.30	0.00	17.55	0.00	42.24	0.00	NA	NA	NA	NA	NA	NA	0	0.00

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: 01/01/1998 TO 12/31/2000						
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 Mortgage Refinance Loans	
	% of Families	% Bank Loans**	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overa II	Low	Mod	Mid	Upp	#	% of Total***

Table 7 \* Market Rank and Market Share data not available.  
 \*\* As a percentage of loans with borrower information available.  
 \*\*\* Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.  
 Table 8 \* Market Rank and Market Share data not available.  
 \*\* As a percentage of loans with borrower information available.  
 \*\*\* Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.  
 Table 9 \* Market Rank and Market Share data not available.



	% of Families	% Bank Loans**	% of Families	% Bank Loans*	% of Families	% Bank Loans*	% of Families	% Bank Loans*		Overa II	Low	Mod	Mid	Upp	#	% of Total***
Saipan AA	24.00	0.00	16.30	0.00	17.55	0.00	42.24	0.00	NA	NA	NA	NA	NA	NA	0	0.00

**Table10. Borrower Distribution: Small Loans to Businesses**

Borrower Distribution: SMALL BUSINESS		Evaluation Period: 01/01/1998 TO 12/31/2000									
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 Loans to Businesses		
	% Business**	% Bank Loans***	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****		
Saipan AA	NA	80.00	88.89	6.67	4.44	11.16	9.89	45	100.00		

**Table11. Borrower Distribution: Small Loans to Farms**

Borrower Distribution: SMALL FARM		Evaluation Period: 01/01/1998 TO 12/31/2000									
MSA/Assessment Area	Businesses With Revenues of \$ 1million 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	>\$250,000 to \$500,000	All	Rev \$ 1 Million or Less	#	% of Total****		
Saipan AA	NA	0.00	0.00	0.00	0.00	0.00	0.00	0	0.00		

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS		Evaluation Period: 01/01/1998 TO 3/31/2001									
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\*\* As a percentage of loans with borrower information available.  
 \*\*\* Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.  
 Table 10 \* The market consists of all other Small Business reporters in UBOC's assessment area and is based on 1999 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 0% of small loans to businesses reported by the bank.  
 \*\*\*\* Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.  
 Table 11 \* The market consists of all other Small Farm reporters in Bank's assessment area and is based on 1999 Aggregate Small Business Data Only only  
 \*\* As a Percentage of Farms with known revenues.  
 \*\*\* As a percentage of loans with borrower income information available.  
 \*\*\*\* Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

MSA/Assessment Area	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Saipan AA	0	0	0	0	0	0	0.00	0	0

Table 12 \* '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".

**Table13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Evaluation Period: 01/01/1998 TO 3/31/2001			
MSA/Assessment Area	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in MSA/AA	# of Bank Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies (%)				# of Branch Closings	# of Branch Openings	Net change in Location of Branches (+ or -)				% of the Population with Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Saipan AA	100.00	1	100.00	NA	NA	100	NA	0	0	0	0	0	0	0.08	4.08	89.47	6.28

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