



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Asia Bank National Association
Charter Number: 18432

135-34 Roosevelt Avenue
Flushing, NY 11354

Office of the Comptroller of the Currency

New York Metro
Harborside Financial Center, Plaza 5, Suite 1600
Jersey City, NJ 07311

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

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Overall CRA Rating

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

The following table indicates the performance level of **Asia Bank, National Association** with respect to the lending, investment, and service tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	x	x	
Low Satisfactory			x
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- The bank's overall lending activity in the assessment area (AA) is *good*. The majority of loans were originated in the bank’s AAs.
- Small loans to businesses provide an *excellent* distribution among different geographies.
- The bank’s performance under the investment test is good. All of the bank’s qualified investments are devoted to low- and moderate-income housing through products that securitize low- and moderate-income residential mortgages.
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank’s assessment areas.
- The level of community development (CD) services is poor when considering the ample opportunities for these services in the bank’s primary assessment area. The lack of CD services had a negative impact on the service test rating.

Definitions and Common Abbreviations

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

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

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

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

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

Geography: A census tract 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 applications, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

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

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

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

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

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Description of Institution

Asia Bank, N.A. is headquartered in Flushing, NY, Queens County, which is approximately 14 miles from New York City. The bank is the sole subsidiary of its holding company, Asia Bancshares, Inc. Asia Bank is an interstate bank with branches in New York and Maryland. There are three full-services branches and one loan center in New York-Queens-Kings counties in New York and one full-service branch in Montgomery County, Maryland. There were no branch openings or closings during our evaluation period. All of the branches, except for the Chinatown branch, have onsite ATMs.

Asia Bank is a community bank that offers various products. These include checking accounts, savings accounts, personal and business loans, residential and commercial mortgages, letters of credit, money transfers, safe deposit boxes, and collections. The bank's main focus is commercial lending.

As of September 30, 2011, Asia Bank has total assets of \$430 million, centered in loans (\$360 million or 84 percent) and investments. Deposits totaled \$359 million. The loan portfolio consists of commercial real estate, multi-family, one-to-four family residential, commercial & industrial, consumer, home equity, construction & development, and business loans. The bank's main loan product is non-residential commercial mortgages, which account for 82 percent of total loans. One-to-four family residential loans represent only seven percent of the portfolio. Over the last year, the bank has experienced a small decline in its assets, loans, and deposits. Assets decreased by two percent and loans by one percent, while deposits decreased four percent to \$359 million. As of September 30, 2011, Tier One Capital is \$67.8 million.

Asia Bank's primary strategy is to provide banking products and services to the local community, targeting the Asian community in New York City and Maryland. The bank has the financial capacity to assist in meeting the credit needs of its assessment area (AA). There are no legal, financial, or other factors which would impact the bank's ability to help meet the credit needs of its community. However, Asia Bank operates in a very competitive environment. The bank's major competitors in its AAs include JPMorgan Chase, Bank of America, Bank of New York Mellon, Wells Fargo, HSBC, East Bank, Chevy Chase Bank, and National Bank of New York City.

Asia Bank's performance under the Community Reinvestment Act was last evaluated on April 30, 2007, based on the standards applicable to Large Banks. The bank's overall rating was "Satisfactory".

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test for home mortgages reported under the Home Mortgage Disclosure Act (HMDA) and for small loans to business is from January 1, 2008 through December 31, 2010. The bank did not originate any home improvement loans or small loans to farms during the evaluation period. Therefore an analysis of these products would not be meaningful and was not performed. The evaluation period for community development loans, investments, and service tests covers activities from May 1, 2007 through November 7, 2011, which represents the end date of the prior CRA review through the start date of this current review.

Asia Bank had one qualifying investment since the previous CRA examination.

Data Integrity

In October 2011, Asia Bank's internal auditors performed an evaluation of the bank's publicly filed information to verify the accuracy and reliability of the HMDA and CRA data. Community development (CD) loans were also verified. The bank's processes, procedures, and internal controls for HMDA and CRA data collection, verification, and reporting were found to be satisfactory. Additionally, we tested a small sample of the HMDA data for loans originated during the evaluation period and found the data to be accurate and reliable for the purposes of our evaluation of Asia Bank's CRA performance.

In the area of community development loans, investments and services, we reviewed and deemed one investment qualified, meeting the community development definition under the CRA regulation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office (New York and Maryland), a sample of assessment areas (AAs) within that state was selected for full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how and why the areas were selected.

Ratings

The bank's overall rating is a blend of the state ratings. Given that a substantial majority of bank activities and deposits are performed in New York, the bank's overall rating is based primarily on the full scope review of the New York AA.

The state ratings are based 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 or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices.

State Rating

State of New York

CRA Rating for New York: Satisfactory

The lending test is rated: High Satisfactory

The investment test is rated: High Satisfactory

The service test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent small business lending in the bank's AA.
- The overall geographic distribution of loans is good.
- The overall distribution of loans by borrower income is good.
- The bank's branches are accessible to geographies and individuals of different income levels.

Description of Institution's Operations in New York

Asia Bank's primary operations are in New York, with three of its four branches and ATMs located in the state. The bank focuses on multifamily and small business lending within its assessment area, designated as the New York-Queens-Kings MD (#35644). During the evaluation periods, 90 percent of the bank's loans and 88 percent of its deposits were originated in the New York AA. Asia Bank faces significant competition in New York, primarily from the large interstate banks which dominate the market. Based on the June 30, 2011 FDIC Deposit Market Share Report, Asia Bank ranked 62 out of 117 institutions for deposit market share in the AA, with 0.04 percent market share. JP Morgan Chase, Bank of New York Mellon, and Bank of America dominate the deposit market with an aggregate market share of over 65 percent.

Refer to the Market Profiles for the State of New York in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New York

Asia Bank has designated one AA in New York. It consists of New York, Queens, and Kings counties which are a part of the New York-White Plains-Wayne, NY-NJ MD (#35644). We conducted a full-scope review of this AA. The bank's overall rating is based primarily on its performance in the New York AA given that a substantial majority of its operations take place in New York. Refer to Appendix A for more information.

For the Lending test, we placed greater emphasis on the Multifamily and Small business lending as they account for the bank's core lending activities.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in New York is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the New York-White Plains-Wayne, NY-NJ MD (#35644) is good.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the state of New York section of appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's overall lending activity in the New York AA is good. The bank originated 146 reportable loans in the AA during the evaluation period, totaling approximately \$81 million. Small loans to businesses accounted for 73% of the total volume and 57% of total dollar amount, while home mortgage lending accounted for 27% of the total volume and 43% of the dollar amount. The bank did not originate or purchase any home improvement loans or small loans to farms during the evaluation period.

Analysis for the lending test in the New York AA focused on small loans to businesses, home purchase, home refinancing, and multifamily loans. The bank's performance in multifamily and small loan to business lending in particular was weighted more heavily in arriving at the overall Lending rating. This is because multifamily housing and small business lending have been identified as needs in the community and the bank is primarily a commercial lender which offers those products.

In evaluating the bank's lending activity, we also considered the bank's market share in the AA. As of June 30, 2011, the bank ranked 62 out of 117 institutions with 0.04% of the market share in deposits. In 2010, the bank ranked 39th out of 161 lenders with 0.46% of the small business market share in the AA.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases. Geographic distribution of home improvement loans is not discussed since the bank did not originate/purchase any home improvement loans during the evaluation period.

The overall geographic distribution of home purchase loans is good.

Home Purchase

Overall, the geographic distribution of home purchase loans is good. Penetration in moderate-income geographies was excellent in the AA. During the evaluation period, the bank made 33.33 percent of its home purchase loans in moderate-income geographies, exceeding the 19.42 percent owner-occupied units in those census tracts. Penetration in low-income geographies is poor. The bank made no home purchase loans in low-income geographies compared to the 2.66 percent of owner-occupied units located in these census tracts. However, the low volume of owner-occupied units in low-income geographies within the AA provides limited opportunities for the bank to make loans in these geographies. Additionally, the bank has no market share in low-income geographies for home purchase loans.

Refinance

The geographic distribution of home mortgage refinance loans is good. The bank did not make any loans in the low-income geographies. However, penetration in the moderate-income geographies was excellent when compared to the percent of owner-occupied units in moderate-income geographies. Additionally, within the AA, the bank's moderate-income market share exceeded its overall market share for refinance loans.

Multifamily loans

The geographic distribution of multifamily lending is good. During the evaluation period, the bank originated 27 multifamily loans. Multifamily loans to moderate-income geographies reflect excellent penetration, with 44.44 percent of the bank's multifamily loans located in moderate-income geographies. Penetration in low-income geographies is poor. The bank's multifamily loans to low-income geographies represented slightly less than half the percent of multifamily units in those geographies. However, Asia Bank's market share in low-income geographies is greater than its overall market share of multifamily loans in the AA.

Small Loans to Businesses

Refer to Table 6 in the state of New York 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 overall geographic distribution of small loans to businesses is excellent.

The percentage of small loans to businesses in low- income geographies far exceeds the percentage of business those geographies within the AA. Similarly, the percentage of small loans to businesses in moderate-income geographies far exceeds the percentage of businesses in those geographies, indicating an excellent level of lending. Additionally, the bank's market share in both low- and moderate-income geographies exceeds the bank's overall small business loan market share in the AA.

Lending Gap Analysis

Our review of the geographic distributions of loans in the New York AA did not detect any conspicuous or unexplained gaps in the bank's lending patterns.

Inside/Outside Ratio

A majority of the bank's home mortgage loans and small loans to businesses were originated inside the AAs. This analysis was performed at the bank level as opposed to the AA level and includes bank originations and purchases only. During the evaluation period, Asia Bank originated a majority (70 percent) of its loans in the AAs. This analysis includes bank originations and purchases only. The volume of loans originated inside the AAs was considered good and positively impacted the overall geographic distribution evaluation.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of New York 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.

An analysis of the distribution of the bank's home mortgage loans by income level of the borrowers is not considered meaningful. The majority of the bank's home mortgage loans were multifamily loans for which income information is not reported. Additionally, borrower income information for the few remaining home mortgage loans was not available.

Small Loans to Businesses

Refer to Table 11 in the state of New York 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 overall borrower distribution of small loans to businesses in the New York AA is excellent.

In the New York AA, the percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) exceeds the percentage of small businesses in the AA. During the evaluation period, the bank made 106 small loans in the AA to businesses with revenues of \$1 million or less. Ten percent of those loans were for \$100 thousand or less, while 26 percent were for "more than \$100 thousand to \$250 thousand". In addition, the bank's market share of loans to businesses with revenues of \$1 million or less, 0.17 percent,

significantly exceeds the bank's overall market share of 0.03 percent, indicating good market performance.

Community Development Lending

Refer to Table 1 Lending Volume in the state of New York section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans.

Asia Bank made no CD loans in the New York AA during the evaluation period. This had a neutral effect on the Lending test rating.

Product Innovation and Flexibility

Product innovation and flexibility had a neutral impact on the lending test conclusion. The bank offers standard loan products.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in New York is rated "high satisfactory". Based on full-scope reviews, the bank's performance in the New York-Queens-Kings AA is good.

Refer to Table 14 in the state of New York section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Asia Bank has three qualifying CD investments totaling approximately \$2.72 million. These investments consist of mortgage pass-through bonds from Fannie Mae (FNMA), securitized by low- and moderate-income residential mortgages. Specifically, one investment of \$2.27 million was made during our evaluation period. The remaining two investments were made in prior evaluation periods and have a combined total outstanding balance of approximately \$444 thousand. All three investments are backed by a pool of mortgage loans to low- and moderate-income individuals in low- and moderate-income census tracts within the AA.

Given the relatively high level of low- and moderate-income families and relatively high cost of living in the New York AA, these investments are responsive to the community development needs of the community. These mortgage-backed securities are not considered innovative or complex.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in New York is rated "low satisfactory". Based on full-scope reviews, the bank's performance in the New York-Queens-Kings AA is adequate.

Retail Banking Services

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

The bank operates three of its four branches within the New York AA. All three branches are full-service and are located in moderate-income census tracts within the AA. The bank has no branches in low-income geographies. No branches were opened or closed during our assessment period, which had no effect on the low- and moderate-income geographies or individuals. Asia Bank's delivery systems are readily accessible to geographies and individuals of different income levels in the AA. The banking services include Deposit Services (Basic Checking, Money Market, Savings, Time Deposit), Loan Services (Business Loans, Commercial Mortgages, Residential Mortgages, SBA Loans), and Other Services (International Money Transfers, Direct Deposit, Safe Deposit Boxes, ATMs). The alternative systems are ATMs, Bank by Mail, and a loan center. The bank is located within close proximity to public transportation, such as buses and subways, which makes it more accessible to the population within the AA. The bank's hours and services offered are consistent among all branches and provide accessibility to geographies and individuals of different income levels. All three branches offer extended business hours on Thursdays and have Saturday hours. Additionally, the main branch in Flushing, NY is also open on Sundays. All the branches have personnel who are fluent in Asian languages.

Community Development Services

Asia Bank provides a poor level of CD services within the New York-Queens-King Counties, which negatively impacts the service test rating. While there are many opportunities in the New York metropolitan area to take part in CD services such as community based organizations and governmental entities with the potential to benefit the AA, the bank does not offer CD services in this AA.

State Rating

State of Maryland

CRA Rating for Maryland: Needs to Improve

The lending test is rated: Low Satisfactory

The investment test is rated: Needs To Improve

The service test is rated: Low Satisfactory

The major factors that support this rating include:

- Asia Bank's responsiveness to lending needs in the AA is poor.
- The level of qualified investments responsive to the identified needs in the AA is poor.
- Delivery systems are readily accessible to individuals and geographies of different income levels.

Description of Institution's Operations in Maryland

The bank has one AA in Maryland, designated as Montgomery, Prince George's, and District of Columbia counties, which are all a part of the Washington-Arlington-Alexandria, DC-VA-MD-WV (MSA # 47900). Asia Bank's operations in Maryland are very limited. During the evaluation period, the bank originated two home mortgage loans and fourteen small loans to businesses in the AA. The bank's only Maryland branch is full service and is located in a moderate-income census tract in Montgomery County. The Maryland AA accounts for 10 percent of the bank's loans and 12 percent of total deposits. Primary business focus for that area is commercial lending but the bank faces strong competition from large interstate banks such as Bank of America NA, Wells Fargo and Capital One Bank NA. These top three local competitors account for a combined 47 percent of the deposit market share compared to Asia Bank's 0.06 percent.

Refer to the Market Profiles for the State of Maryland in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in Maryland

A full scope review of the Maryland AA was conducted. The Maryland state rating is based on our review of this AA. Refer to the table in Appendix A for more information.

The bank made a limited number of loans in this AA during the evaluation period. Of that small number, the majority of loans were small loans to businesses. As such, the bank's performance in small loans to business lending was most heavily weighted in arriving at the overall rating for the state.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Maryland is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Maryland AA is adequate.

Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the state of Maryland section of appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's geographic distribution of its small business loans is rated more heavily in the Lending test rating for Maryland. The bank's overall lending activity in the Maryland AA is poor. The bank had limited lending activity in the AA during the evaluation period. A total of 16 HMDA and CRA loans were originated, representing approximately 10 percent of the bank's reportable loans during the evaluation period. Despite the small number, the percentage of loans originated is proportionate to the percent of the bank's deposits in Maryland, which accounted for over 12 percent of the bank's total deposits. Management cites tough competition as the main reason for the bank's low origination levels as well as the bank's commercial real estate business focus and limited presence in the area. Nonetheless, despite the difficulties discussed, there are opportunities within the AA that would allow the bank to improve its performance. As identified by community contacts, there are unmet credit needs within the AA that fit the bank's product offerings.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in the state of Maryland 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 bank originated only two home mortgage loans in the Maryland AA during the evaluation period. Therefore, an analysis of home mortgage loans is not meaningful.

Small Loans to Businesses

Refer to Table 6 in the state of Maryland 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 the bank's small loans to businesses in the Maryland AA during the evaluation period is excellent.

Asia Bank's small loans to businesses in low-income geographies in the AA substantially exceeded the percentage of businesses located in those geographies. The bank's market share for small business lending in the low-income geographies was more than the bank's overall small business lending market share, indicating good market performance in low-income geographies. The bank originated 36 percent of its small business loans to borrowers in moderate-income geographies, which far exceeds the percentage of businesses in those geographies within the AA. The bank's excellent performance is highlighted even more by the fact that it has no market share in those geographies.

Lending Gap Analysis

Our review of the geographic distributions of loans in the Maryland AA did not detect any conspicuous or unexplained gaps in the bank's lending patterns.

Inside/Outside Ratio

This analysis was performed at the bank level rather than by AA. As such, please refer to the comment under the State of New York rating.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Maryland 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 bank originated a minimal number of home mortgage loans during the evaluation period. As such, an analysis of the borrower distribution of these is not meaningful.

Small Loans to Businesses

Refer to Table 11 in the state of Maryland 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 Maryland AA is excellent. The bank made 14 small loans to businesses with revenues of \$1 million or less. While none of the

loans were for \$100 thousand or less, 43 percent ranged in size from over \$100 thousand to \$250 thousand.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Maryland section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans.

Asia Bank made no CD loans in the Maryland AA during the evaluation period. This had a neutral effect on the Lending test rating.

Product Innovation and Flexibility

Product innovation and flexibility had a neutral impact on the lending test conclusion. The bank offers standard loan products.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Maryland AA is rated "Needs to Improve". Based on a full-scope review, the bank's performance in the Maryland AA is poor.

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

Asia Bank did not make any investments in this AA during our evaluation period. Based on discussions with community contacts, there are many investment opportunities within the AA. However, the bank has two investments made in prior evaluation periods with a total outstanding balance of \$561 thousand as of December 31, 2010. These investments included one FHLMC mortgage backed security and one FNMA mortgage backed security backed by a pool of mortgage loans to low- and moderate-income individuals in low- and moderate-income census tracts in this AA.

These investments are responsive to the community development needs. They are not considered innovative or complex.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in Maryland is rated "low satisfactory". Based on a full-scope review, the bank's performance in the Maryland AA is adequate.

Retail Banking Services

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

The bank operates one of its four branches within the AA. The one full-service branch located in Montgomery County is in a moderate-income tract. There are no branches in low-income geographies. No branches were opened or closed during our assessment period, which had no effect on the low- and moderate-income geographies or individuals. Asia Bank's delivery systems are readily accessible to geographies and individuals of different income levels in the AA. The banking services include Deposit Services (Basic Checking, Money Market, Savings, Time Deposit), Loan Services (Business Loans, Commercial Mortgages, Residential Mortgages, SBA Loans), and Other Services (International Money Transfers, Direct Deposit, Safe Deposit Boxes, ATMs). The alternative systems are ATMs, Bank by Mail, and a loan center. Hours and services offered are typical and are tailored to meet the convenience and needs of the AA. The bank's hours and services provide accessibility to geographies and individuals of different income levels. The branch offers extended business hours on Thursdays and has Saturday hours.

Community Development Services

Asia Bank provides a poor level of CD services within the Maryland AA, which negatively impacts the service test rating. While there are many opportunities in the Maryland area to take part in CD services, the bank does not offer CD services in its AA.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/08 to 12/31/10) Investment and Service Tests and CD Loans: (05/01/07 to 11/07/11)	
Financial Institution		Products Reviewed
(Asia Bank, National Association (Asia Bank) 135-34 Roosevelt Avenue, Flushing, NY 11354)		Home Mortgages, Small Loans to Businesses, CD Loans, Qualified CD Investments
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>[Instructions: Provide only if affiliate products are reviewed.]</i> None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
State of New York New York-Queens-Kings MD #35644 State of Maryland Washington-Arlington-Alexandria MSA (small portion) #47900	Full Scope Full Scope	

Appendix B: Summary of State Ratings

RATINGS		BANK NAME		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
Asia Bank, N.A.	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State:				
New York	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Maryland	Low Satisfactory	Needs to Improve	Low Satisfactory	Needs to Improve

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

State of New York Full-Scope Area

New York-Queens-Kings MD

Demographic Information for Full-Scope Area: New York-Queens-Kings AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,656	10.87	29.17	33.15	24.40	2.42
Population by Geography	5,782,495	12.57	34.21	30.68	22.49	0.05
Owner-Occupied Housing by Geography	662,669	2.66	19.41	37.96	39.97	0.00
Businesses by Geography	407,047	6.87	21.95	23.09	46.59	1.50
Farms by Geography	1,371	5.54	18.09	27.50	48.58	0.29
Family Distribution by Income Level	1,339,751	29.93	16.94	17.37	35.76	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	627,907	20.36	43.33	26.95	9.37	0.00
Median Family Income	= \$49,461					
HUD Adjusted Median Family Income for 2011	= \$65,600					
Households Below the Poverty Level	= 19%					
				Median Housing Value	= \$251,208	
				Unemployment Rate	= 4.28%	

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

Source: 2000 U.S. Census, and 2011 HUD updated MFI.

Asia Bank's full scope AA in New York consists of Queens, New York, and Kings Counties. These counties represent three of the five boroughs of New York City, and are otherwise referred to as Queens, Manhattan, and Brooklyn, respectively. Asia Bank is headquartered in Flushing, New York and has three full-service branches in this AA. The bank operates one full-service branch in New York County and two full-service branches in Queens County. The bank has ATMs at its Elmhurst branch and at its Flushing branch. Although there are no branches in Kings County, it is considered part of the AA because it does provide loans to residents of this county and because of the close proximity of its branches to this county.

New York, Queens, and Kings Counties are located in the New York-Wayne-White Plains Metropolitan Statistical Area (MD #35644). The AA conforms to CRA regulations and does not arbitrarily exclude low- or moderate-income geographies. Based on 2000 census data, the overall population of the AA is 5,782,495. Of this population, 12.57 percent reside in low-income geographies, 34.21 percent reside in moderate-income geographies, 30.68 percent reside in middle-income geographies, 22.49 percent reside in upper-income geographies, and 0.05 percent reside in unknown geographies. The average median family income was \$49,461, and the 2010 adjusted HUD median family income was \$65,600. While this median family income is relatively high, much of this is driven by large bonuses and salaries paid to employees of the financial services firms. This income is expected to provide an overall

benefit to the New York economy as much of it is expected to be spent on housing, products, and services in New York.

The total number of housing units within the AA is 2,319,673, of which 28.57 percent is owner-occupied, 68.58 percent are rentals, and 5.56 percent are vacant. Approximately 11.13 percent of all housing units within the AA are located within low-income geographies, while 31.05 percent of housing units are within moderate-income geographies. The median housing value was \$251,208 compared to a state median value of \$148,700 and a national average of \$119,600, based on 2000 census data.

Asia Bank faces significant competition in this AA. Competition for loans, deposits, CD loans, and investments is very strong. However, considering that 46.8 percent of the population in the AA is of low- and moderate-income, there are adequate community development opportunities for small institutions with a limited presence. Based on the FDIC's June 2011 deposit market share report, the bank ranked 62 out of 117 institutions with a .04 percent deposit market share as of June 30, 2011. The three major competitors within the same MSA were JP Morgan Chase Bank, N.A. with a 44.6 percent market share, Bank of New York Mellon with a 13.2 percent market share, and Bank of America with a 7.48 percent market share.

The New York AA has a diversified mix of businesses and contains the headquarters of many national and international corporations. The largest sectors in the Metropolitan New York area include education and health services, government, professional and business services, and financial services. Historically, downtown Manhattan has been dominated by the financial services industry. Industries operating in midtown Manhattan area include advertising, publishing, and garment production. Major employers include New York-Presbyterian Healthcare System, Citigroup, JPMorgan Chase & Company, and Verizon Communications.

As a result of recent regional and national economic conditions, the local housing and employment market is in the midst of a slow recovery process. The unemployment rate in the AA as of September 2011 is 8.3 percent according to Bureau of Labor Statistics data. Comparatively, the state's unemployment rate as of September 2011 is 8 percent and the national unemployment rate is 9.1 percent. According to Moody's, New York City's recovery will remain intact, even though the odds of a double-dip recession have risen over the past several months. The labor and housing markets are in better shape within the AA than national levels and will continue to improve over the next year. House prices are likely to fall further as foreclosures mount. Over the longer term, income and productivity growth will outpace the nation's levels, though job growth will be slower because of slower population growth.

For this examination, we contacted one community development organization from the New York AA. We also considered information obtained from a contact made in connection with a separate examination performed June 2011. These two local community development organizations provided insight into the needs of the AA, particularly as it relates to low- and moderate-income individuals and families. Discussions with these community contacts revealed that there is a need for lending to small business owners and educating potential entrepreneurs on small business ownership. Community contacts also revealed that there are opportunities for banks to fund/support community based organizations that directly benefit small business development and small business advisory services (start-ups, alternative financing, etc.).

State of Maryland Full Scope Area

Washington-Arlington-Alexandria MSA (Montgomery, Prince George's and District of Columbia counties)

Demographic Information for Full-Scope Area: Maryland AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	538	12.64	31.78	31.41	22.86	1.30
Population by Geography	2,192,106	9.57	31.11	34.62	24.45	0.25
Owner-Occupied Housing by Geography	491,434	3.66	22.65	41.48	32.20	0.00
Businesses by Geography	188,209	7.36	23.69	33.77	32.12	3.06
Farms by Geography	2,265	2.43	15.32	47.64	34.30	0.31
Family Distribution by Income Level	528,323	24.31	19.14	21.50	35.05	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	229,548	16.46	43.12	30.21	10.21	0.00
Median Family Income	= \$73,844					
HUD Adjusted Median Family Income for 2011	= \$104,359					
Households Below the Poverty Level	= 9%					
				Median Housing Value	= \$187,674	
				Unemployment Rate	= 3.22%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 U.S. Census, and 2011 HUD updated MFI.

The Maryland AA includes portions of the Washington-Arlington-Alexandria, D.C.-MD-VA-WV Multistate MSA (#47900). It is comprised of the Montgomery, Prince George's and District of Columbia counties in Maryland. The AA does not cover the entire MSA because the area would be too large for the bank to reasonably service with one branch. Asia Bank's only branch in Maryland is located in Montgomery County. The AA meets legal requirements and does not arbitrarily exclude any low- or moderate-income geographies. Asia Bank operates in a very competitive environment, especially with only one branch/ATM in the AA. Based on the June 30, 2011 FDIC Summary of Deposits, Asia Bank ranks 41st out of 53 lenders with 0.06 percent of the deposit market share. Deposit market share leaders are Bank of America NA, Wells Fargo NA, Capital One Bank NA, and Sun Trust Bank, which collectively dominate the market with over \$41 billion in deposits or 60 percent market share.

Asia Bank's operations in this AA are limited. At December 31, 2010, Maryland AA deposits accounted for 12 percent of the bank's total deposits. During the evaluation period, 10 percent of the reportable loans were made in this AA, the majority of which were small loans to businesses.

The Maryland economy is said to be recovering, but the level of recovery differs by geography and industry. Positively impacting AA economic improvements are the Base Realignment and Closure Act (BRAC) and the area's close proximity to Washington, D.C., both of which support core federal hiring. Professional and business growth remain slow. Analysts believe that

rising business costs in Northern Virginia will result in business expansion in Maryland. The AA is considered to be suburban Maryland and Maryland is considered as the center of security and medical and biomedical research. Other area strengths include a well-educated workforce and high per capita income. The 2010 AA unemployment rate was 7.5 percent which is well below the national average.

Among the area's weaknesses are worsening state and federal budget problems and unforeseen housing pricing concerns. Additionally, while foreclosures and delinquencies in Maryland have been less of a concern, research suggests that there is still a foreclosure pipeline.

Two community contacts were referenced during this evaluation with representatives of affordable housing and small business development corporations. These organizations revealed that there is a need for financing and educating small business owners in the AA. There is also a need for affordable housing (multifamily), particularly in the neighborhoods most affected by the recession and high foreclosure levels. The contacts also stated that opportunities exist for financial institutions to support the community development work of local organizations.

Appendix D: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/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 be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

Tables of Performance Data

**STATE OF NEW YORK
(NEW YORK-QUEENS-KINGS COUNTIES)**

**STATE OF MARYLAND
(MONTGOMERY-PRINCE GEORGE'S-DISTRICT OF COLUMBIA COUNTIES)**

Table 1. Lending Volume

LENDING VOLUME												Geography: MARYLAND AND NEW YORK		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010	
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
Full Review:															
Asia Bank- Maryland AA	9.88	2	723	14	4,691	0	0	0	0	16	5,414	12.33			
Asia Bank- New York- Queens-Kings AA	90.12	40	34,930	106	45,751	0	0	0	0	146	80,681	87.67			

* Loan Data as of December 31, 2010. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is January 1, 2008 to December 31, 2010.

*** Deposit Data as of November 17, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MARYLAND AND NEW YORK					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography ¹				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total ²	% Owner Occ Units ³	% BANK Loans ⁴	% Owner Occ Units ³	% BANK Loans	% Owner Occ Units ³	% BANK Loans	% Owner Occ Units ³	% BANK Loans						
Full Review:																
Asia BK - Maryland MSA	2	25.00	3.66	50.00	22.65	0.00	41.48	0.00	32.21	50.00	0.00	0.04	0.00	0.00	0.00	
Asia Bk - New York -Queens - Kings MSA	6	75.00	2.66	0.00	19.41	33.33	37.96	33.33	39.97	33.33	0.01	0.00	0.00	0.01	0.01	

¹ Based on 2010 Peer Mortgage Data (USPR)

² Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

³ Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MARYLAND AND NEW YORK				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
Full Review:															
Asia BK - Maryland MSA	0	0.00	3.66	0.00	22.65	0.00	41.48	0.00	32.21	0.00	0.00	0.00	0.00	0.00	0.00
Asia Bk - New York -Queens -Kings MSA	0	0.00	2.66	0.00	19.41	0.00	37.96	0.00	39.97	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2010 Peer Mortgage Data (USPR)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MARYLAND AND NEW YORK				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Asia BK - Maryland MSA	0	0.00	3.66	0.00	22.65	0.00	41.48	0.00	32.21	0.00	0.00	0.00	0.00	0.00	0.00	
Asia Bk - New York -Queens -Kings MSA	7	100.00	2.66	0.00	19.41	28.57	37.96	14.29	39.97	57.14	0.00	0.00	0.03	0.00	0.00	

* Based on 2010 Peer Mortgage Data (USPR)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY															Geography: MARYLAND AND NEW YORK					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
Asia BK - Maryland MSA	0	0.00	16.00	0.00	43.55	0.00	22.39	0.00	18.07	0.00	0.00	0.00	0.00	0.00	0.00									
Asia Bk - New York -Queens -Kings MSA	27	100.00	15.24	7.41	32.48	44.44	22.55	33.33	29.73	14.81	0.43	0.53	0.21	1.28	0.00									

* Based on 2010 Peer Mortgage Data (USPR)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MARYLAND AND NEW YORK						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Asia BK - Maryland MSA	14	11.67	7.36	28.57	23.69	35.71	33.77	14.29	32.12	21.43	0.00	0.05	0.00	0.00	0.00
Asia Bk - New York - Queens -Kings MSA	106	88.33	6.87	12.26	21.95	43.40	23.09	26.42	46.59	17.92	0.03	0.09	0.06	0.04	0.01

* Based on 2010 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2010).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MARYLAND AND NEW YORK					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010					Market Share [*]				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{***}	% Families ¹	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
Asia BK - Maryland MSA	2	25.00	24.31	0.00	19.14	0.00	21.50	0.00	35.05	0.00	0.00	0.00	0.00	0.00	0.00	
Asia Bk - New York -Queens -Kings MSA	6	75.00	29.93	0.00	16.94	0.00	17.37	0.00	35.76	100.00	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2010 Peer Mortgage Data (USPR)

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

^{***} Percentage of Families is based on the 2000 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 87.5% of loans originated and purchased by bank.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MARYLAND AND NEW YORK						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families ²	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Asia BK - Maryland MSA	0	0.00	24.31	0.00	19.14	0.00	21.50	0.00	35.05	0.00	0.00	0.00	0.00	0.00	0.00
Asia Bk - New York - Queens -Kings MSA	0	0.00	29.93	0.00	16.94	0.00	17.37	0.00	35.76	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2010 Peer Mortgage Data (USPR)

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

^{***} Percentage of Families is based on the 2000 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MARYLAND AND NEW YORK						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ³	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Asia BK - Maryland MSA	0	0.00	24.31	0.00	19.14	0.00	21.50	0.00	35.05	0.00	0.00	0.00	0.00	0.00	0.00
Asia Bk - New York - Queens -Kings MSA	7	100.00	29.93	0.00	16.94	0.00	17.37	0.00	35.76	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2010 Peer Mortgage Data (USPR)

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

^{***} Percentage of Families is based on the 2000 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 100.0% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MARYLAND AND NEW YORK			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [†]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Asia BK - Maryland MSA	14	11.67	77.02	100.00	0.00	42.86	57.14	0.00	0.01
Asia Bk - New York -Queens -Kings MSA	106	88.33	74.04	100.00	10.38	26.42	63.21	0.03	0.17

[†] Based on 2010 Peer Small Business Data -- US and PR

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

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2010).

^{****} 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 0.00% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MARYLAND AND NEW YORK									
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010									
Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Asia BK - Maryland MSA	2	0	0	0	2	560,863.67	17.08	0	0
Asia Bk - New York - Queens -Kings MSA	2	0	0	2,279,425.49	3	2,722,947.38	82.92	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: MARYLAND AND NEW YORK				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010										
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
Full Review:																		
Asia BK - Maryland MSA	12.33	1	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0	9.57	31.11	34.62	24.45
Asia Bk - New York -Queens -Kings MSA	87.67	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0	12.57	34.21	30.68	22.49