

## PUBLIC DISCLOSURE

June 15, 2018

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Asian Pacific National Bank Charter Number 23006

333 West Valley Boulevard San Gabriel, CA 91776

Office of the Comptroller of the Currency

550 North Brand Boulevard, Suite 500 Glendale, CA 91203

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**

#### The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's loan-to-deposit ratio is reasonable given the bank's size and performance context.
- A majority of the bank's lending activity is within its delineated assessment area.
- The bank's distribution of loans to businesses of different sizes reflects excellent penetration compared to area demographics.
- The geographic distribution of business loans reflects excellent dispersion throughout the assessment area compared to area demographics.

## **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 areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn, 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 five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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 Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties 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) 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**

Asian Pacific National Bank (APNB or bank) is a full-service community bank headquartered in San Gabriel, California. The bank opened in August 1990 as an industrial thrift and loan association and converted to a national bank charter effective December 1995. The main branch is located in San Gabriel, California in a middleincome census tract. In addition, the bank has one branch located in an upper-income census tract in Rowland Heights, California.

APNB offers a variety of commercial loan products to meet the credit needs of small and medium-size businesses, with an emphasis on commercial real estate and commercial/industrial lending. The bank offers consumer installment loans primarily as an accommodation to business customers. APNB offers traditional services at both of its branches. The bank does not have an automated teller machine (ATM).

As of March 31, 2018, APNB reported total assets of \$58 million, total loans of \$22 million, total deposits of \$48 million, and total equity capital of \$9.3 million. The following chart summarizes the loan portfolio by major loan type. (\*Note: The \$3.1 million in 1-4 Residential Real Estate (RE) are commercial loans for business use, secured by single family residence.)

Loan Portfolio Outsta by Major Prod	Asian Pacific National Bank Loan Portfolio Outstanding Balances by Major Product Type As of March 31, 2018										
Loan Type	(000's)	Percent									
Commercial Real Estate	13,691	62.1									
Multifamily Residential RE	2,068	9.4									
Construction	1,144	5.1									
1-4 Family Residential RE	*3,105	14.1									
Commercial-Industrial	2,052	9.3									
Consumer	0	0.0									
Total	\$22,060	100%									

There are no financial or legal factors that impede the bank's ability to meet the credit needs of the community. APNB received a "Satisfactory" rating under the "Small Bank" rating criteria at the previous CRA examination, dated July 8, 2013.

## Scope of the Evaluation

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

This Performance Evaluation (PE) assesses Asian Pacific National Bank's Community Reinvestment Act (CRA) performance using the lending test criteria for small bank examinations. We performed a full-scope examination of the bank's assessment area. We analyzed all commercial loans the bank originated or renewed between January 1, 2015 and December 31, 2017, as this is representative of the bank's lending strategy during the evaluation period. We focused our review on commercial loans because they represent the major portion of the bank's lending activity. We performed separate analyses on the 2015-2016 data and the 2017 data, due to changes instituted by the 2015 American Community Survey.

#### **Data Integrity**

We evaluated the data integrity of all loans originated and renewed during the evaluation period, which totaled 75 loans between January 1, 2015 and December 31, 2017. We verified the census tract information for each borrower, including whether the borrower was in or out of the bank's assessment area, and the census tract income level. We also verified the total revenue for each commercial borrower. We found the data to be accurate, and thus we were able to include all 75 loans in our analysis.

### Selection of Areas for Full-Scope Review

We performed a full-scope review of the bank's one assessment area. Table A provides a summary of the assessment area demographics, and a description of APNB's assessment area.

#### Ratings

The bank's overall rating is based on the one area that received a full-scope review.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## **Conclusions with Respect to Performance Tests**

## LENDING TEST

Based on the analysis of all commercial loans originated and renewed during the evaluation period, the bank's performance in meeting the credit needs of the community is Satisfactory. During the evaluation period, APNB originated a majority of its loans to borrowers inside the assessment area (AA). The loan-to-deposit (LTD) ratio is reasonable given the bank's size and performance context. The bank has excellent penetration both among businesses of different sizes and geographic dispersion throughout the AA. Each of the areas considered in the lending test are described below.

#### Loan-to-Deposit Ratio

APNB's LTD ratio is reasonable given the bank's size, financial condition, and local economic conditions. We analyzed the bank's quarterly average LTD ratio for the prior 23 quarters since the previous CRA examination through March 31, 2018. APNB's average LTD ratio for this period was 45 percent. For the purpose of this analysis, we compared the bank's ratio to the average ratio of three banks that are similar in both asset size and geographic location. The combined average quarterly LTD ratio for the comparable banks over the same period was 85 percent, with the ratios ranging from 52 percent to 107 percent.

Performance context explains that APNB maintains conservative loan underwriting practices despite increasing competitive pressures. The bank operates in a very intensely competitive environment and holds only 0.01 percent of the deposit market share in Los Angeles MSA, with four large institutions holding over 55 percent.

Table D		ding In umber			side of th	ne Assessn Dollar		int of Lo		6
Loan Category	Ins	side	Out	tside	Total	Insid	le	Outs	ide	Total \$(000s)
	36	68%	17	32%	53	\$16,641	70%	\$7,007	30%	\$23,648

#### Lending in Assessment Area

Table	e D - L	ending	Inside	e and O	utside of	the Asse	ssmen	t Area - 2	2017	
	N	umber	of Loa	ans		Dollar	r Amou \$(00	unt of Lo )0s)	ans	
Loan Category	Ins	side	Ou	tside	Total	Insie	de	Outsi	ide	Total \$(000s)
	18	77%	5	23%	22	\$8,305	76%	\$2,557	24%	\$10,862

APNB originated a majority of its loans within its delineated assessment area during both time periods, and meets the standard for satisfactory performance.

#### Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography- 2015-2016

			oans to sinesses	Low-	Income T	racts	Modera	te-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts
Assessment Area:	#	% of Total	Overall Market #	<b>%</b>	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
APNB	50	93	57,348	0.6	8.0	0.4	14.0	56.0	14.6	39.3	22.0	39.7	45.8	14.0	45.0
Source: 2015	-201	6 D&B	3 Data; 01	/01/2015 - 12	2/31/2016	Bank Data;	2015-2016 C	CRA Aggre	egate Data.						

Source: 2015-2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2015-2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.

# Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - 2017

Total Loans to Small Businesses       Low-Income Tracts       Moderate-Income Tracts       Middle-Income Tracts       Upper-Income Tracts															
Assessment Area:	#	% of Total	Varzot	0/2	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
APNB	22	95	73,556	0.8	6.0	0.8	17.3	58.0	17.3	34.3	18.0	34.3	49.5	18.0	49.5
Source: 2017	7 Dð	&B Date	a; 01/01/2	017 - 12/31/2	2017 Bank	: Data; 2016	CRA Aggreg	ate Data.							

Due to rounding, totals may not equal 100.0.

The bank's distribution of loans to businesses of different sizes reflects excellent penetration compared to area demographics and exceeds the standard for satisfactory performance. The bank originated most of its loans by number and by dollar volume to small business borrowers in its assessment area. This compares favorably to small business demographics in the Los Angeles MSA.

#### Geographic Distribution of Loans

# Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues- 2015-2106

Assessment Area: # \$(000s) Total Market # Businesses Loans Aggregate Businesses Loans Businesses Loans Compared Businesses Loans Businesses Businesse			Total Loans to Sm	all Business	es	Businesses	with Revenu	tes <= 1MM		ith Revenues > MM	Businesses with Revenues Not Available	
APNR 50 22.014 93.0 57.348 79.1 86.0 54.7 5.1 7.0 15.8 7	Assessment Area:	#	\$(000s)					Aggregate	, .			% Bank Loans
	APNB	50	22,014	93.0	57,348	79.1	86.0	54.7	5.1	7.0	15.8	7.0

*Source: 2015-2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2015-2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.* 

# Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues- 2017

		Total Loans to Sm	all Business	es	Businesses w	vith Revenues	s <= 1MM	Businesses wit > 1M		Businesses with Revenues Not Available	
Assessment Area:	#	\$(000s)	% of Total	Overall Market #	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Business es	% Bank Loans
APNB	22	10,587	90.0.0	57,348	79.1	86.0	54.7	5.1	5.0	15.8	9.0

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Due to rounding, totals may not equal 100.0.* 

The bank's distribution of loans to businesses of different sizes reflects excellent penetration compared to area demographics in both time periods and exceeds the standard for satisfactory performance. This compares favorably to small business demographics in the Los Angeles MSA.

#### **Responses to Complaints**

APNB has not received any complaints about its performance under the CRA during this evaluation period.

## **Appendix A: Scope of Examination**

The following table identifies the most recent time period covered in this evaluation (2017), and loan products considered. The table reflects the metropolitan area that received a comprehensive examination review (designated by the term "full-scope").

Time Period Reviewed	Lending Test: (January 1, 2015 to December 31, 2017)					
Financial Institution		Products Reviewed				
Asian Pacific National Bank (APNB San Gabriel, CA	)	Commercial real estate and commercial/industrial (business) loans				
Affiliate(s)	Affiliate Relationship	Products Reviewed				
[Instructions: Provide only if affiliate products are reviewed.] NA	NA	NA				
List of Assessment Areas and Ty	pe of Examination					
Assessment Area	Type of Exam	Other Information				
San Gabriel Valley	Full-Scope	NA				

## Appendix B: Community Profiles for Full-Scope Areas

### San Gabriel Valley, CA

Table A – Den	Table A – Demographic Information of the Assessment Area         Assessment Area: APNB											
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #						
Geographies (Census Tracts)	429	1.2	19.3	38.9	39.9	0.7						
Population by Geography	1,965,981	0.9	19.5	39.7	39.5	0.3						
Housing Units by Geography	624,045	0.9	17.9	37.0	44.2	0.0						
Owner-Occupied Units by Geography	346,804	0.3	11.3	35.4	52.9	0.0						
Occupied Rental Units by Geography	241,645	1.7	27.2	39.5	31.6	0.0						
Vacant Units by Geography	35,596	1.0	18.7	34.8	45.3	0.1						
Businesses by Geography	129,611	0.8	17.3	34.3	47.3	0.3						
Farms by Geography	1,392	0.6	12.3	36.6	50.4	0.1						
Family Distribution by Income Level	444,753	19.7	15.8	17.6	46.9	0.0						
Household Distribution by Income Level	588,449	21.2	14.6	16.3	47.9	0.0						
Median Family Income MSA - 31084 Los Angeles- Long Beach-Glendale, CA MD		\$62,703	Median Hou	using Valu	e	\$494,609						
			Median Gro	ss Rent		\$1,327						
			Families Be	low Pover	tv Level	10.5%						

### DESCRIPTION OF ASSESSMENT AREA

APNB has designated its assessment area (AA) as the communities of the San Gabriel Valley. These include the cities of Pasadena, Alhambra, San Gabriel, El Monte, South El Monte, Monterey Park, Rosemead, Temple City, Diamond Bar, Hacienda Heights, City of Industry, La Puente, Rowland Heights, Walnut, and West Covina. The AA includes 429 census tracts of the total 2,054 census tracts that make up the Los Angeles MSA. Five of the census tracts (1.17 percent) are low-income; 83 (19.35 percent) are moderate-income; 167 (38.93 percent) are middle-income; 171 (39.86 percent) are upper-income and three (0.70 percent) do not have an income designation. The bank's AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income geographies. APNB has established lending opportunities in the AA and has determined that the designated AA is an area the bank can reasonably serve.

The banking environment in the bank's AA is highly competitive. The June 30, 2017 FDIC Deposit Market Share report indicates that 125 institutions compete for deposits in the Los Angeles Metropolitan Statistical Area (MSA). APNB ranks 105<sup>th</sup> and holds a deposit market share of 0.01 percent. Eighty-seven percent of the deposits in the AA are held by Bank of America, N.A.; Wells Fargo, N.A.; MUFG Union Bank N.A.; JP Morgan Chase, N.A.; City National Bank; Citibank, N.A.; CIT Bank, N.A.; East West Bank; U.S. Bank, N.A.; Bank of Hope; Bank of the West; Commerce Bank; Pacific Western Bank; Cathay Bank; Comerica Bank; HSBC Bank USA, N.A.; First Republic Bank; and Farmers and Merchants Bank of Long Beach. The remaining competing banks hold less than 1 percent each. The banks that compete for deposits in the AA also compete for loans. In addition, there are numerous other institutions that do not collect deposits but compete for loans in the AA, making it even more difficult for banks to compete for loans than deposits.

The 2016 U.S. Census median housing value was \$465,000 in the Los Angeles County MSA. The California Association of Realtors noted the Los Angeles County MSA median sales price of a home as of March 2018 was \$515,000, up from \$474,080 in March 2017, a 9 percent increase in one year. Approximately, 46 percent of the housing units are owner-occupied. The 2017 HUD updated MSA median family income is \$64,300. About 10.5 percent of the population is below the poverty level.

The bank's AA has 122,415 businesses and 1,296 farms. Approximately 79 percent of the businesses are small (gross annual revenues of \$1 million or less); 5 percent are large businesses with gross annual revenues over \$1 million; and 16 percent consists of businesses where income data was not collected/reported.

The economy in the AA showed signs of improvement during the review period. Payrolls increased primarily because of a surge in hiring among the construction, transportation, manufacturing, healthcare, bioscience, finance, government, hospitality and tourism, and professional services, including entertainment.

As of March 2018, the Los Angeles unemployment rate dropped to 4.1 percent, which is equal to the national unemployment rate, and slightly below the unemployment rate of 4.3 percent for the State of California. The top industries in the Los Angeles County MSA are state and local government, restaurants, private household workers, motion picture and video, health-related services, employment services, colleges and universities, aerospace, banking, and federal government. The top employers are Los Angeles County and City Governments, State of California Government, U.S. Federal Government, Kaiser Permanente, University of Southern California, Bank of America, N.A., University of California Los Angeles, Walt Disney Company, Los Angeles Unified School District and Boeing Corporation.

We reviewed two recent community contacts in the Los Angeles County MSA: one is a collaborative of five community organizations, which assists in the development of small- and micro-businesses that focus on low- and moderate-income (LMI) Asian immigrants; and the other educates LMI youth with workforce development and financial literacy. These contacts indicated the following are the most significant community development needs in the bank's AA:

- Affordable housing, especially for LMI families and young adults;
- Financial literacy training and education for immigrant workers and business owners that do not speak English;
- Financial literacy education for LMI youth and families, including the importance of credit, how to establish and use credit, and predatory lending training;
- Smaller dollar loans, better products for LMI business owners, and loans with more flexible terms;
- Technical assistance and education for small business owners or entrepreneurs regarding how to run a business (recordkeeping, accounting, taxes, and providing sufficient documentation for obtaining loans from a financial institution); and,
- Help the unbanked population overcome hurdles to become mainstream banking clients.